

# **Evidence for the US Senate Judiciary Committee on Cambridge Analytica and SCL Group**

**By Dr Emma L Briant, Senior Lecturer (equivalent to Associate Professor) at University of Essex**

I am grateful to Chris Wylie for including quotes from my interviews conducted for my [upcoming book](#) 'What's wrong with the Democrats? Media Bias, Inequality and the rise of Donald Trump' (co-authored with Prof. Robert M Entman, see [www.emma-briant.co.uk/books](http://www.emma-briant.co.uk/books)) in his written evidence for this hearing. It was a real honor that Senator Cory Booker quoted my interview with Nigel Oakes in his questions to Mr Wylie at the Hearing, and Senator Dianne Feinstein quoted my evidence on Cambridge Analytica's outreach to Assange. I am delighted to have now been invited to submit fuller evidence to the Senate Judiciary Committee to contextualize these quotes and present any new material for the Committee to consider. The evidence below draws together insights from my interviews with key executives at SCL and Cambridge Analytica [CA] and explores key questions of importance to this Committee. In submitting this evidence I want to emphasise that 'fake news', disinformation and the misuse of data are not issues that can be addressed by tinkering with a focus solely on US elections while ignoring the destabilising way this industry operates globally. We must work together to provide a protective environment that nurtures digital democracy or corporate entities will exploit inconsistencies in our international legal and policy frameworks. Whether recent threats have come from home or abroad, they have had a common theme, they sought to amplify tensions caused by inequality which is increasingly a security threat as well as an injustice. Contemporary social media and tools of persuasion allow digital influencers considerable unseen power over the individual. The online architecture of social media encourage the individual to focus on themselves, failing to see their data's significance within the collective, even as it becomes more and more compulsory to be 'connected' and surrender data. SCL Group is a logical product of poor regulation, weak oversight and legal loopholes in digital persuasion. Digital communication industries are dominated by monopolies such as Facebook who have been incentivised to abuse our data. The logic of the system created is to enable what we have witnessed to reproduce unless a strong independent regulator is established to bring structural changes - ensure transparency, accountability and proportional use of our data. The evidence is in three sections:

1. Digital Campaigns and Microtargeting: Didn't Obama do this too?
2. Evidence on Leave.EU, Eldon Insurance and US Health Insurance Industry
3. Oversight of Government Contracts and Relationships Between Cambridge Analytica and SCL Group

## **1 Digital Campaigns and Microtargeting: Didn't Obama do this too?**

The issue was raised in the hearing of the Senate Judiciary Committee on 21<sup>st</sup> May 2018 about whether the methods deployed by Cambridge Analytica in 2016 were comparable to those Obama used in 2012. Dr Mark Jamison, argued that the methods were 'nothing new' and Dr Eitan Hersh called into question the effectiveness of these forms of persuasion. Nix also claimed at the UK Fake News Inquiry that "big data and predictive analytics in political campaigns was something that was really championed by Obama's campaign in 2008" and "in 2012, the Democrats pioneered the use of addressable advertising technology in order to improve the way that they use this data to target people as individuals" to justify CA's actions. While true, Nix also emphasised CA's advancements and now can't have it both ways. They may also be drawing false equivalence. The Obama campaign, known for transforming data-driven targeting, laid the groundwork for manipulative techniques with which campaign contractors are now experimenting. Since then these methods have rapidly advanced and scrutiny and responsive and independent expert-led regulation is long overdue.

Brittany Kaiser, CA's director of business development who worked on data for the 2008 Obama campaign is friends with the data scientists who worked for Clinton and told me their campaign data operations were very basic by comparison. Indeed, this is what attracted her to take the post at CA (Interview: Kaiser/Briant, 4th March 2018). She emphasised the extent of their use of data compared to the Democratic campaigns throughout the interview, including the scale of their surveys of “millions of people in the United States” and “Instead of considering, you know, thousands and thousands of data points and buying in licensing, commercial and lifestyle data from *every* source and even having people go down to getting like, you know, church group lists and everything for extra data points. I mean what we were doing was *as far as you could possibly go...* on their [Democrat] side [...] they were really relying upon, [...] past voting history [...] people's election data, more than other things. At least that's what they say. So I don't know if they would say that if it wasn't true, that'd be really strange.” (Interview: Kaiser/Briant, 4th March 2018). Kaiser explained that the parties used data differently, and Democrats did not exploit personality and values to the same degree. “It doesn't really make any sense when the reason why Trump won was because of the first time voters and disaffected voters, people who had not voted in a long time that were moved to come out. So if you're spending all your time on people that have voted before and judging what they're going to do based on their past political engagement then that's just not right. It doesn't make any sense.” (Interview: Kaiser/Briant, 4th March 2018).

Such methods and algorithms as CA deployed are “black-boxed” and difficult to prove. However, extensive evidence on unethically sourced data was presented by Wylie to the Guardian, and even some sceptics about the uniqueness of CA's technology, Jay Pinho for example, recognize the powerful significance of CA's use of misleading and manipulative, grossly unethical tactics as setting them apart from Obama's campaign. Fetishizing their specific technology will only promote its power. The point is how they abused data (and people) for profit, the political impact of their campaign, and the implications of rapid development in this area for the future for all our democracies.

Furthermore, it is also misleading to abstract the tools from how they were deployed – using our data is not in itself the problem, the issue is *how* it is being used, and this must be regulated with increased transparency at minimum. The [Channel 4 expose](#) reveals Cambridge Analytica derived their power from a willingness to abuse it, targeting the vulnerable, hacking, and entrapping opponents. In the US election Oakes told me, with a tone of admiration, that they recognized the power in Trump's message, “...when we explain in the two-minute lift pitch what happened with Trump... you can forget all the micro-targeting and micro-data whatever and come back to some very very simple things which is: Trump had the balls, *really* the balls to say what people wanted to hear.” (Interview: Oakes/Briant, 24th November 2017). CA's political campaigns hinged on lies, and Oakes recognized this and understood it was not without victims. Indeed Oakes knew the kind of false messaging they were deploying has had victims before. He told me,

“sometimes to attack the 'other' group, and know that you're gonna lose them, is going to reinforce or resonate *your* group, which is why, Hitler... I've got to be very careful about saying so... you must never say this... off the record, but... of course, Hitler attacked the *Jews* because... he didn't have a problem with the Jews at *all*. But *the people* didn't like the Jews... so if *the people* thought... [...] He could just use them to say... so he just leveraged an artificial enemy, well it's exactly what Trump did. He leveraged a Muslim- I mean, you know, it's... it *was* a real enemy... ISIS or whatever... but how big a threat is ISIS really to America? I mean, really? I mean, we're still talking about 9-11, well 9-11 is a long time ago.” (Interview: Oakes/Briant, 24th November 2017 Original Emphasis - this interview excerpt has been published in parliamentary evidence).

While, of course, ISIS and their terrorism posed a very real threat within Iraq and Syria and have been responsible for a massive humanitarian crisis, a report by the US Government Accountability Office shows that from Sept. 12, 2001, to Dec. 31, 2016, there were 85 deadly attacks by homegrown violent extremists of which 62 were by far right extremists. Rhetoric of a 'Muslim threat' to Western countries has been used repeatedly by politicians to argue for immigration controls, increased defense spending for counter-terrorism abroad, and for domestic programs deployed to 'counter' oft-exaggerated threats. Oakes joked about Trump manipulating and reinforcing Americans' false belief that Muslim migrants are a threat to their country, a myth propagated extensively on the right of American politics:

NO: '[Trump] also said *ridiculous* things like, we're going to ban Muslims from coming into the country because I'm *sick* of people taking machine guns and pointing them at *schools*... and our children... and our children are the most important thing... Well there's never *been* a Muslim, *ever* that's put a gun on an American school, but it seems to-'

EB: it's the perception

NO: '-yeh, *that's* terrorism, and they *must* be Muslims, and there've been a lot of shootings... They're all Americans doing the shootings! And people go 'Yeah, fuck, it's our children! [...] And so you've got Hillary Clinton going 'We're going to increase the fiduciary financial spending and four percent growth in our area.....' and people go 'well, you know, good luck with that... I wanna build a wall...' (Interview: Oakes/Briant, 24th November 2017).

[Aleksandr Kogan ran a survey on psychopathy, narcissism and Machiavellianism – the 'dark triad' which are linked to aggressive behaviour online](#) and it is deeply important we learn exactly how this was deployed in the Trump Campaign and beyond, whether there were efforts to work out how to 'trigger' and exploit these traits. Americans must strengthen regulatory and oversight systems from this experience to ensure that their upcoming elections are transparent and ethically and democratically deployed. We must prepare for a very different future and investigate further the potential threat of commercial and political exploitation of our communication environment and the emotions we reveal within it poses. Our data can reveal more about us than we wish to think about; the potentials for harm in some capabilities cannot be understated — machine learning can successfully identify markers of depression from our Instagram photos for instance (Reece and Danforth, 2017) — as many declare #metoo, post-Weinstein, it is not unlikely that future campaigns could seek to combine these and similar data to exploit psychological wounds, mental health issues and trigger emotionally driven responses among vulnerable citizens. We urgently must consider how to restrict what can be done with such psychologically driven microtargeting. In order to prevent targeting of aggressive trolling whilst not limiting free speech in #metoo and similar movements it may be important to consider how to protect against nefarious actors deliberately aggressively microtargeting people declaring a status that might indicate a level of vulnerability. There is also not enough in place to prevent anyone seeking to deliberately and aggressively exploit psychopathy, severe depression or other recognised psychological conditions. 'Tendency to criminality' was included in a slide describing items for 'behavioural scoring' of SCL Commercial in documents discussing their work for Malaysian company Petronas – we must ask why? Any safeguards would require algorithms are made transparent to an independent regulator.

## **2 Evidence on Leave.EU, Eldon Insurance and US Health Insurance Industry**

I conducted interviews with key executives from Cambridge Analytica (CA) and Leave.EU as part of my upcoming academic [research on](#) research on migration, political campaigns and media narratives (See my previous co-authored book [Bad News for Refugees](#)). Findings of my interviews confirm that work was performed by CA for Leave.EU, and that they designed the strategy that was deployed by Leave.EU. While my interviews were inconsistent on how far CA was involved in Leave.EU, they illuminate key questions raised by ongoing investigations of both. Here I consider:

While, of course, ISIS and their terrorism posed a very real threat within Iraq and Syria and have been responsible for a massive humanitarian crisis, a report by the US Government Accountability Office shows that from Sept. 12, 2001, to Dec. 31, 2016, there were 85 deadly attacks by homegrown violent extremists of which 62 were by far right extremists. Rhetoric of a 'Muslim threat' to Western countries has been used repeatedly by politicians to argue for immigration controls, increased defense spending for counter-terrorism abroad, and for domestic programs deployed to 'counter' oft-exaggerated threats. Oakes joked about Trump manipulating and reinforcing Americans' false belief that Muslim migrants are a threat to their country, a myth propagated extensively on the right of American politics:

NO: '[Trump] also said *ridiculous* things like, we're going to ban Muslims from coming into the country because I'm *sick* of people taking machine guns and pointing them at *schools*... and our children... and our children are the most important thing... Well there's never *been* a Muslim, *ever* that's put a gun on an American school, but it seems to-'

EB: it's the perception

NO: '-yeh, *that's* terrorism, and they *must* be Muslims, and there've been a lot of shootings... They're all Americans doing the shootings! And people go 'Yeah, fuck, it's our children! [...] And so you've got Hillary Clinton going 'We're going to increase the fiduciary financial spending and four percent growth in our area.....' and people go 'well, you know, good luck with that... I wanna build a wall...'' (Interview: Oakes/Briant, 24th November 2017).

[Aleksandr Kogan ran a survey on psychopathy, narcissism and Machiavellianism – the 'dark triad' which are linked to aggressive behaviour online](#) and it is deeply important we learn exactly how this was deployed in the Trump Campaign and beyond, whether there were efforts to work out how to 'trigger' and exploit these traits. Americans must strengthen regulatory and oversight systems from this experience to ensure that their upcoming elections are transparent and ethically and democratically deployed. We must prepare for a very different future and investigate further the potential threat of commercial and political exploitation of our communication environment and the emotions we reveal within it poses. Our data can reveal more about us than we wish to think about; the potentials for harm in some capabilities cannot be understated — machine learning can successfully identify markers of depression from our Instagram photos for instance (Reece and Danforth, 2017) — as many declare #metoo, post-Weinstein, it is not unlikely that future campaigns could seek to combine these and similar data to exploit psychological wounds, mental health issues and trigger emotionally driven responses among vulnerable citizens. We urgently must consider how to restrict what can be done with such psychologically driven microtargeting. In order to prevent targeting of aggressive trolling whilst not limiting free speech in #metoo and similar movements it may be important to consider how to protect against nefarious actors deliberately aggressively microtargeting people declaring a status that might indicate a level of vulnerability. There is also not enough in place to prevent anyone seeking to deliberately and aggressively exploit psychopathy, severe depression or other recognised psychological conditions. 'Tendency to criminality' was included in a slide describing items for 'behavioural scoring' of SCL Commercial in documents discussing their work for Malaysian company Petronas – we must ask why? Any safeguards would require algorithms are made transparent to an independent regulator.

## **2 Evidence on Leave.EU, Eldon Insurance and US Health Insurance Industry**

I conducted interviews with key executives from Cambridge Analytica (CA) and Leave.EU as part of my upcoming academic [research on](#) research on migration, political campaigns and media narratives (See my previous co-authored book [Bad News for Refugees](#)). Findings of my interviews confirm that work was performed by CA for Leave.EU, and that they designed the strategy that was deployed by Leave.EU. While my interviews were inconsistent on how far CA was involved in Leave.EU, they illuminate key questions raised by ongoing investigations of both. Here I consider:

1. CA's level of involvement in the Leave.EU campaign, whether and how CA methods were used
2. What data was used in the Leave.EU campaign and how was it deployed
3. What was the relationship between Leave.EU campaign and Eldon Insurance and how does this help us understand current involvement in the insurance industry in UK and US?

### **Cambridge Analytica's level of Involvement in Britain's EU Referendum:**

Investigations in the UK have been exploring whether services were provided and not declared by Cambridge Analytica in the Leave.EU campaign – this has been denied by both parties.

The UK's Electoral Commission are fining Leave.EU for not declaring services received by Gerry Gunster. I also interviewed Andy Wigmore Communications Director for Leave.EU in October 2017, and he shared, 'they [Cambridge Analytica] didn't give us a little box of toys and say, there you are, have a go. They just said look, if-- you gotta prepare for this because if we come in, this is what we need and what we want -- we want to do it' (Interview: Wigmore/Briant, 4th October 2017). From Brittany Kaiser's testimony and the fact [an invoice was issued for working on the UKIP component of the work in Cambridge Analytica's Leave.EU proposal – which Arron Banks then gave UKIP money for \(see the Guardian's reporting\)](#), it does seem like [Cambridge Analytica at least thought they had provided a service for which they had been hired](#).

In my early conversations with Brittany Kaiser it was clear that she did not know that Andy Wigmore had continued to deploy the strategy Cambridge Analytica designed for them when they lost the designation. It became apparent when Kaiser first showed me documents that she subsequently submitted to the British Parliamentary Committee on Digital, Culture, Media and Sport Inquiry into Fake News, that the methods and strategy Andy Wigmore described to me in interview had remarkable similarity to the plan she designed for them (this she provided in her evidence to the British Inquiry and I have attached it here for easy reference). Indeed the Leave.EU team told me they copied it. I interviewed Gerry Gunster, an American strategist, on CA's involvement in Leave.EU and he stated as follows: 'Cambridge Analytica, although they were involved early on, they sort of gave a bit of a backbone on how to do behavioral targeting and micro-targeting...' and with psychographic targeting, 'they provided some backbone for *how* to do it and then a lot of it was just kind of handed over to the campaign staff' (Interview: Gunster/Briant, 4th October 2017). Leave.EU Communication Director Andy Wigmore's statements regarding CA have been inconsistent, but referring to the Cambridge Analytica method he also told me, 'probably yes - it probably was useful because *we copied it*.' (Interview: Wigmore/Briant, 4th October 2017).

### **Deployment of Cambridge Analytica's strategy by Eldon Insurance Staff**

Cambridge Analytica had [produced this dual strategy for using UKIP and insurance data to produce benefits for the insurance company](#). Wigmore told me Leave.EU had Eldon Insurance employees deploy the plan copied from Cambridge Analytica, with four actuaries, two marketers and a graphics team running the campaign all out of the same address (Interview: Wigmore/Briant, 4th October 2017). Wigmore also explains how this was done:

“So, some of the things they [Cambridge Analytica] did tell us, which were-- which were-- we did copy. And no question about that, is about, you know, these small clusters, this you need to find out in the - where these people are and what matters to them. And what we were able to deduce from that, and remember, um, ah, and as an insurance company you have actuaries that work for you. Actuaries are brilliant, they're mathematicians. So if you give them a problem and you say right we want to look, here's, here's some stuff. What do you think of the probabilities? They will-- came up with the probabilities of the areas that were most concerned about the EU and we got that from our own actuaries. We had - we have four actuaries which we said right, tell us what this looks like from

1. CA's level of involvement in the Leave.EU campaign, whether and how CA methods were used
2. What data was used in the Leave.EU campaign and how was it deployed
3. What was the relationship between Leave.EU campaign and Eldon Insurance and how does this help us understand current involvement in the insurance industry in UK and US?

### **Cambridge Analytica's level of Involvement in Britain's EU Referendum:**

Investigations in the UK have been exploring whether services were provided and not declared by Cambridge Analytica in the Leave.EU campaign – this has been denied by both parties.

The UK's Electoral Commission are fining Leave.EU for not declaring services received by Gerry Gunster. I also interviewed Andy Wigmore Communications Director for Leave.EU in October 2017, and he shared, 'they [Cambridge Analytica] didn't give us a little box of toys and say, there you are, have a go. They just said look, if-- you gotta prepare for this because if we come in, this is what we need and what we want -- we want to do it' (Interview: Wigmore/Briant, 4th October 2017). From Brittany Kaiser's testimony and the fact [an invoice was issued for working on the UKIP component of the work in Cambridge Analytica's Leave.EU proposal – which Arron Banks then gave UKIP money for \(see the Guardian's reporting\)](#), it does seem like [Cambridge Analytica at least thought they had provided a service for which they had been hired](#).

In my early conversations with Brittany Kaiser it was clear that she did not know that Andy Wigmore had continued to deploy the strategy Cambridge Analytica designed for them when they lost the designation. It became apparent when Kaiser first showed me documents that she subsequently submitted to the British Parliamentary Committee on Digital, Culture, Media and Sport Inquiry into Fake News, that the methods and strategy Andy Wigmore described to me in interview had remarkable similarity to the plan she designed for them (this she provided in her evidence to the British Inquiry and I have attached it here for easy reference). Indeed the Leave.EU team told me they copied it. I interviewed Gerry Gunster, an American strategist, on CA's involvement in Leave.EU and he stated as follows: 'Cambridge Analytica, although they were involved early on, they sort of gave a bit of a backbone on how to do behavioral targeting and micro-targeting...' and with psychographic targeting, 'they provided some backbone for *how* to do it and then a lot of it was just kind of handed over to the campaign staff' (Interview: Gunster/Briant, 4th October 2017). Leave.EU Communication Director Andy Wigmore's statements regarding CA have been inconsistent, but referring to the Cambridge Analytica method he also told me, 'probably yes - it probably was useful because *we copied it*.' (Interview: Wigmore/Briant, 4th October 2017).

### **Deployment of Cambridge Analytica's strategy by Eldon Insurance Staff**

Cambridge Analytica had [produced this dual strategy for using UKIP and insurance data to produce benefits for the insurance company](#). Wigmore told me Leave.EU had Eldon Insurance employees deploy the plan copied from Cambridge Analytica, with four actuaries, two marketers and a graphics team running the campaign all out of the same address (Interview: Wigmore/Briant, 4th October 2017). Wigmore also explains how this was done:

“So, some of the things they [Cambridge Analytica] did tell us, which were-- which were-- we did copy. And no question about that, is about, you know, these small clusters, this you need to find out in the - where these people are and what matters to them. And what we were able to deduce from that, and remember, um, ah, and as an insurance company you have actuaries that work for you. Actuaries are brilliant, they're mathematicians. So if you give them a problem and you say right we want to look, here's, here's some stuff. What do you think of the probabilities? They will-- came up with the probabilities of the areas that were most concerned about the EU and we got that from our own actuaries. We had - we have four actuaries which we said right, tell us what this looks like from

our data and they're the ones that pinpointed the twelve areas in the United Kingdom that we needed to send Nigel Farage to.' (Interview: Wigmore/Briant, 4th October 2017).

Phase I of Cambridge Analytica's plan seems to have been carried out with Cambridge Analytica – [the plan submitted to the UK Fake News Inquiry by Former Cambridge Analytica Business Development Director Brittany Kaiser](#) states under Phase I: 'Significant work has already been completed, and this should take no longer than ten days including sign-off from Leave.EU and its partners on the content of the political questionnaire'-(Interview: Wigmore/Briant, 4th October 2017). The following also sounds like Phase I of the Cambridge Analytica plan: 'We started by doing the biggest poll we possibly could. We polled at least 10,000 people and found out what the main concerns were. So the main one that stood out like an absolute sore thumb was immigration and what, you know, what came up in immigration was housing, schools, overcrowding, never racism... and people didn't say they didn't say they didn't *want* immigration, they just didn't *like* immigration. Because it was changing their lifestyles.' (Interview: Wigmore/Briant, 4th October 2017).

My interview with Andy Wigmore seems to indicate that Leave.EU also deployed parts of 'Phase II' of Cambridge Analytica's plan – [Phase II involved 'online surveys'](#). He states: 'from a standing start we sent out on Facebook 'if you are interested in leaving the EU... or are you against the EU?

Support us...' so people 'liked' which is nothing... can't do anything with that... OR you can *join*... and you pay money to join, so we ended up with close on 200,000 members. And a lot of, almost a third of our money - which is a lot - we spent almost £8 Million - was got from small donations. Anything from a pound to a thousand pounds in some cases. If they join... we asked them two things: would you like to be polled ...and'

EB: But this wasn't on Facebook though -

AW: 'No no no, on Facebook you recruited them, so if they clicked on a link, then they came through to our website and they filled out ...*then* you've got the data. And *that* we were using anyway but we didn't need to give it to Cambridge Analytica or anything like that.' (Interview: Wigmore/Briant, 4th October 2017).

Importantly, my evidence shows that Leave.EU copied and were able to deploy an effective campaign based on Cambridge Analytica's methods following the pitch and guidance that Kaiser gave them which raises concern about whether other entities who received a similar pitch could also have replicated their methodology, I discuss oversight below.

### **Leave.EU, UKIP, Eldon Insurance and the US Health Insurance Industry**

Andy Wigmore claimed it wasn't possible to deploy Cambridge Analytica's AI methodology without access to 'electoral roll data which you can then use [...] Because Cambridge Analytica artificial intelligence requires data - if you don't have it, you can't do it.' - this implied that they couldn't do CA's artificial intelligence because they didn't have enough data (Interview: Wigmore/Briant, 4th October 2017). But Wigmore later told me:

AW: 'So. Um, so, if you take... You talk about data. So you have a lot of data when you're an insurer. And that data is, it's, there's layers and layers and layers. You know, you have, um, ah, lifestyle data, of course you do. You have, um, credit check data which of course you do. All that data you put that together, the way you can actually then make risk against an individual is incredibly strong. So our ratios, in other words, you always say, right, if we take on this customer what are the chances of them making a claim within a twenty-four year- uh, twelve month period, twenty-four month, is it high? Because they're so de- so low social demographic grouping, they don't have a proper job, they have to take out a loan to pay for their car insurance, you can make a risk assessment of that. So makes it more expensive.' (Interview: Wigmore/Briant, 4th October 2017).

Subsequent evidence indicates that the campaign may have used both [Eldon Insurance's data and UKIP data](#). Asked about whether they might have used a political database for commercial purposes by the [Observer, Banks said 'Why shouldn't I? It's my data.'](#) Andy Wigmore confirmed in interview with me, 'We used *our* data. Gerry took *our* data, which we'd... and we started to look at polling.' (Interview: Wigmore/Briant, 4th October 2017). Both of these datasets were factored in to the [original Cambridge Analytica plan which Brittany Kaiser submitted as evidence](#) which indicates how the Leave.EU 'psychographic survey' would be used to build 'psychographic insurance'. While Andy Wigmore was happy to admit copying Cambridge Analytica's methods for the Leave.EU campaign, he sought to present the Leave.EU team's deployment of Artificial Intelligence and knowledge of how to draw on this for Eldon Insurance as an apparent happy accident resulting from their own visionary brilliance:

AW: 'Let's say the referendum's just finished. What we discovered, we were actually quite bloody good at artificial intelligence. And we've applied what we learned in the referendum to our business model for insurance. (Interview: Wigmore/Briant, 4th October 2017).

But this indicates they deployed the complementary workstreams part of [Cambridge Analytica's dual strategy](#). If, as this evidence shows, Cambridge Analytica's plan was indeed used it is hard to understand how this would not be considered a gift in kind or receipt of services, particularly as Kaiser [described seeing the datasets of the political campaign and insurance company being used in parallel](#) during her visit to their offices. My own evidence and that of Brittany Kaiser directly contradict the [conclusions drawn by the Electoral Commission](#) which declare 'the relationship did not develop beyond initial scoping work'.

The desire to take credit for developing the expertise themselves may have been because they are now selling their expertise in the United States insurance market. Wigmore explained to me: 'So for- for risk and, um, making sure you get the right person who's not gonna be fraudulent, not gonna make claims they, you know, you know so much about them. So we've started an operation in Ole Miss University in Mississippi which is the centre for artificial intelligence in the world, who knew? [...] And, and, and the guy that runs it, he's like the most extraordinary data scientist. So when we explained all our sorta, d'you know what, you should have a chat with him. When we explained what we did- [...] He thought we were completely nuts. He said, how on earth did you create? This is how we created it. He couldn't get his head around it. But, if you took the application of what we learned in, you know, learned, self-learning, you know, with the ads that we did, what worked, what didn't, who responded, how they responded, et cetera. Et cetera. And you apply that kind of learning to-' [jumps on to next point] (Interview: Wigmore/Briant, 4th October 2017).

The algorithms developed through the 'complementary workstreams' allowed them to evaluate risk for their insurance company 'imagine if you had the ability to say, this person is absolutely brilliant. We know as an insurer, it's worth giving them a good price because we know they're unlikely to make a claim, they're solid, they've got a good job, um, you know, they've got a family life, blah, blah, blah, blah, blah. So that in artificial intelligence terms is the holy grail in insurance. So that was a by-product of what we discovered, brilliantly. And that's all about data. That is all about data. So um, that was- that was the upshot. So we've set this up in Mississippi. It's been going for nine months, we've been testing for twelve months now, testing all the insurance against it and it's extraordinary.' (Interview: Wigmore/Briant, 4th October 2017). This was lucrative, Wigmore said the disparity was 'Massive. Massive. Our loss ratios have dropped by about 13 - 14 per cent. And in- in insurance terms that's millions of pounds. Millions. Because what happens, for every pound of insurance you give someone, you have to put two pounds into like an escrow account to cover just in case that person ever makes a claim. It's called solvency. Very dull, very boring. But, so if you

1. CA's level of involvement in the Leave.EU campaign, whether and how CA methods were used
2. What data was used in the Leave.EU campaign and how was it deployed
3. What was the relationship between Leave.EU campaign and Eldon Insurance and how does this help us understand current involvement in the insurance industry in UK and US?

### **Cambridge Analytica's level of Involvement in Britain's EU Referendum:**

Investigations in the UK have been exploring whether services were provided and not declared by Cambridge Analytica in the Leave.EU campaign – this has been denied by both parties.

The UK's Electoral Commission are fining Leave.EU for not declaring services received by Gerry Gunster. I also interviewed Andy Wigmore Communications Director for Leave.EU in October 2017, and he shared, 'they [Cambridge Analytica] didn't give us a little box of toys and say, there you are, have a go. They just said look, if-- you gotta prepare for this because if we come in, this is what we need and what we want -- we want to do it' (Interview: Wigmore/Briant, 4th October 2017). From Brittany Kaiser's testimony and the fact [an invoice was issued for working on the UKIP component of the work in Cambridge Analytica's Leave.EU proposal – which Arron Banks then gave UKIP money for \(see the Guardian's reporting\)](#), it does seem like [Cambridge Analytica at least thought they had provided a service for which they had been hired](#).

In my early conversations with Brittany Kaiser it was clear that she did not know that Andy Wigmore had continued to deploy the strategy Cambridge Analytica designed for them when they lost the designation. It became apparent when Kaiser first showed me documents that she subsequently submitted to the British Parliamentary Committee on Digital, Culture, Media and Sport Inquiry into Fake News, that the methods and strategy Andy Wigmore described to me in interview had remarkable similarity to the plan she designed for them (this she provided in her evidence to the British Inquiry and I have attached it here for easy reference). Indeed the Leave.EU team told me they copied it. I interviewed Gerry Gunster, an American strategist, on CA's involvement in Leave.EU and he stated as follows: 'Cambridge Analytica, although they were involved early on, they sort of gave a bit of a backbone on how to do behavioral targeting and micro-targeting...' and with psychographic targeting, 'they provided some backbone for *how* to do it and then a lot of it was just kind of handed over to the campaign staff' (Interview: Gunster/Briant, 4th October 2017). Leave.EU Communication Director Andy Wigmore's statements regarding CA have been inconsistent, but referring to the Cambridge Analytica method he also told me, 'probably yes - it probably was useful because *we copied it*.' (Interview: Wigmore/Briant, 4th October 2017).

### **Deployment of Cambridge Analytica's strategy by Eldon Insurance Staff**

Cambridge Analytica had [produced this dual strategy for using UKIP and insurance data to produce benefits for the insurance company](#). Wigmore told me Leave.EU had Eldon Insurance employees deploy the plan copied from Cambridge Analytica, with four actuaries, two marketers and a graphics team running the campaign all out of the same address (Interview: Wigmore/Briant, 4th October 2017). Wigmore also explains how this was done:

“So, some of the things they [Cambridge Analytica] did tell us, which were-- which were-- we did copy. And no question about that, is about, you know, these small clusters, this you need to find out in the - where these people are and what matters to them. And what we were able to deduce from that, and remember, um, ah, and as an insurance company you have actuaries that work for you. Actuaries are brilliant, they're mathematicians. So if you give them a problem and you say right we want to look, here's, here's some stuff. What do you think of the probabilities? They will-- came up with the probabilities of the areas that were most concerned about the EU and we got that from our own actuaries. We had - we have four actuaries which we said right, tell us what this looks like from

1. CA's level of involvement in the Leave.EU campaign, whether and how CA methods were used
2. What data was used in the Leave.EU campaign and how was it deployed
3. What was the relationship between Leave.EU campaign and Eldon Insurance and how does this help us understand current involvement in the insurance industry in UK and US?

### **Cambridge Analytica's level of Involvement in Britain's EU Referendum:**

Investigations in the UK have been exploring whether services were provided and not declared by Cambridge Analytica in the Leave.EU campaign – this has been denied by both parties.

The UK's Electoral Commission are fining Leave.EU for not declaring services received by Gerry Gunster. I also interviewed Andy Wigmore Communications Director for Leave.EU in October 2017, and he shared, 'they [Cambridge Analytica] didn't give us a little box of toys and say, there you are, have a go. They just said look, if-- you gotta prepare for this because if we come in, this is what we need and what we want -- we want to do it' (Interview: Wigmore/Briant, 4th October 2017). From Brittany Kaiser's testimony and the fact [an invoice was issued for working on the UKIP component of the work in Cambridge Analytica's Leave.EU proposal – which Arron Banks then gave UKIP money for \(see the Guardian's reporting\)](#), it does seem like [Cambridge Analytica at least thought they had provided a service for which they had been hired](#).

In my early conversations with Brittany Kaiser it was clear that she did not know that Andy Wigmore had continued to deploy the strategy Cambridge Analytica designed for them when they lost the designation. It became apparent when Kaiser first showed me documents that she subsequently submitted to the British Parliamentary Committee on Digital, Culture, Media and Sport Inquiry into Fake News, that the methods and strategy Andy Wigmore described to me in interview had remarkable similarity to the plan she designed for them (this she provided in her evidence to the British Inquiry and I have attached it here for easy reference). Indeed the Leave.EU team told me they copied it. I interviewed Gerry Gunster, an American strategist, on CA's involvement in Leave.EU and he stated as follows: 'Cambridge Analytica, although they were involved early on, they sort of gave a bit of a backbone on how to do behavioral targeting and micro-targeting...' and with psychographic targeting, 'they provided some backbone for *how* to do it and then a lot of it was just kind of handed over to the campaign staff' (Interview: Gunster/Briant, 4th October 2017). Leave.EU Communication Director Andy Wigmore's statements regarding CA have been inconsistent, but referring to the Cambridge Analytica method he also told me, 'probably yes - it probably was useful because *we copied it*.' (Interview: Wigmore/Briant, 4th October 2017).

### **Deployment of Cambridge Analytica's strategy by Eldon Insurance Staff**

Cambridge Analytica had [produced this dual strategy for using UKIP and insurance data to produce benefits for the insurance company](#). Wigmore told me Leave.EU had Eldon Insurance employees deploy the plan copied from Cambridge Analytica, with four actuaries, two marketers and a graphics team running the campaign all out of the same address (Interview: Wigmore/Briant, 4th October 2017). Wigmore also explains how this was done:

“So, some of the things they [Cambridge Analytica] did tell us, which were-- which were-- we did copy. And no question about that, is about, you know, these small clusters, this you need to find out in the - where these people are and what matters to them. And what we were able to deduce from that, and remember, um, ah, and as an insurance company you have actuaries that work for you. Actuaries are brilliant, they're mathematicians. So if you give them a problem and you say right we want to look, here's, here's some stuff. What do you think of the probabilities? They will-- came up with the probabilities of the areas that were most concerned about the EU and we got that from our own actuaries. We had - we have four actuaries which we said right, tell us what this looks like from

our data and they're the ones that pinpointed the twelve areas in the United Kingdom that we needed to send Nigel Farage to.' (Interview: Wigmore/Briant, 4th October 2017).

Phase I of Cambridge Analytica's plan seems to have been carried out with Cambridge Analytica – [the plan submitted to the UK Fake News Inquiry by Former Cambridge Analytica Business Development Director Brittany Kaiser](#) states under Phase I: 'Significant work has already been completed, and this should take no longer than ten days including sign-off from Leave.EU and its partners on the content of the political questionnaire'-(Interview: Wigmore/Briant, 4th October 2017). The following also sounds like Phase I of the Cambridge Analytica plan: 'We started by doing the biggest poll we possibly could. We polled at least 10,000 people and found out what the main concerns were. So the main one that stood out like an absolute sore thumb was immigration and what, you know, what came up in immigration was housing, schools, overcrowding, never racism... and people didn't say they didn't say they didn't *want* immigration, they just didn't *like* immigration. Because it was changing their lifestyles.' (Interview: Wigmore/Briant, 4th October 2017).

My interview with Andy Wigmore seems to indicate that Leave.EU also deployed parts of 'Phase II' of Cambridge Analytica's plan – [Phase II involved 'online surveys'](#). He states: 'from a standing start we sent out on Facebook 'if you are interested in leaving the EU... or are you against the EU?

Support us...' so people 'liked' which is nothing... can't do anything with that... OR you can *join*... and you pay money to join, so we ended up with close on 200,000 members. And a lot of, almost a third of our money - which is a lot - we spent almost £8 Million - was got from small donations. Anything from a pound to a thousand pounds in some cases. If they join... we asked them two things: would you like to be polled ...and'

EB: But this wasn't on Facebook though -

AW: 'No no no, on Facebook you recruited them, so if they clicked on a link, then they came through to our website and they filled out ...*then* you've got the data. And *that* we were using anyway but we didn't need to give it to Cambridge Analytica or anything like that.' (Interview: Wigmore/Briant, 4th October 2017).

Importantly, my evidence shows that Leave.EU copied and were able to deploy an effective campaign based on Cambridge Analytica's methods following the pitch and guidance that Kaiser gave them which raises concern about whether other entities who received a similar pitch could also have replicated their methodology, I discuss oversight below.

### **Leave.EU, UKIP, Eldon Insurance and the US Health Insurance Industry**

Andy Wigmore claimed it wasn't possible to deploy Cambridge Analytica's AI methodology without access to 'electoral roll data which you can then use [...] Because Cambridge Analytica artificial intelligence requires data - if you don't have it, you can't do it.' - this implied that they couldn't do CA's artificial intelligence because they didn't have enough data (Interview: Wigmore/Briant, 4th October 2017). But Wigmore later told me:

AW: 'So. Um, so, if you take... You talk about data. So you have a lot of data when you're an insurer. And that data is, it's, there's layers and layers and layers. You know, you have, um, ah, lifestyle data, of course you do. You have, um, credit check data which of course you do. All that data you put that together, the way you can actually then make risk against an individual is incredibly strong. So our ratios, in other words, you always say, right, if we take on this customer what are the chances of them making a claim within a twenty-four year- uh, twelve month period, twenty-four month, is it high? Because they're so de- so low social demographic grouping, they don't have a proper job, they have to take out a loan to pay for their car insurance, you can make a risk assessment of that. So makes it more expensive.' (Interview: Wigmore/Briant, 4th October 2017).

Subsequent evidence indicates that the campaign may have used both [Eldon Insurance's data and UKIP data](#). Asked about whether they might have used a political database for commercial purposes by the [Observer, Banks said 'Why shouldn't I? It's my data.'](#) Andy Wigmore confirmed in interview with me, 'We used *our* data. Gerry took *our* data, which we'd... and we started to look at polling.' (Interview: Wigmore/Briant, 4th October 2017). Both of these datasets were factored in to the [original Cambridge Analytica plan which Brittany Kaiser submitted as evidence](#) which indicates how the Leave.EU 'psychographic survey' would be used to build 'psychographic insurance'. While Andy Wigmore was happy to admit copying Cambridge Analytica's methods for the Leave.EU campaign, he sought to present the Leave.EU team's deployment of Artificial Intelligence and knowledge of how to draw on this for Eldon Insurance as an apparent happy accident resulting from their own visionary brilliance:

AW: 'Let's say the referendum's just finished. What we discovered, we were actually quite bloody good at artificial intelligence. And we've applied what we learned in the referendum to our business model for insurance. (Interview: Wigmore/Briant, 4th October 2017).

But this indicates they deployed the complementary workstreams part of [Cambridge Analytica's dual strategy](#). If, as this evidence shows, Cambridge Analytica's plan was indeed used it is hard to understand how this would not be considered a gift in kind or receipt of services, particularly as Kaiser [described seeing the datasets of the political campaign and insurance company being used in parallel](#) during her visit to their offices. My own evidence and that of Brittany Kaiser directly contradict the [conclusions drawn by the Electoral Commission](#) which declare 'the relationship did not develop beyond initial scoping work'.

The desire to take credit for developing the expertise themselves may have been because they are now selling their expertise in the United States insurance market. Wigmore explained to me: 'So for- for risk and, um, making sure you get the right person who's not gonna be fraudulent, not gonna make claims they, you know, you know so much about them. So we've started an operation in Ole Miss University in Mississippi which is the centre for artificial intelligence in the world, who knew? [...] And, and, and the guy that runs it, he's like the most extraordinary data scientist. So when we explained all our sorta, d'you know what, you should have a chat with him. When we explained what we did- [...] He thought we were completely nuts. He said, how on earth did you create? This is how we created it. He couldn't get his head around it. But, if you took the application of what we learned in, you know, learned, self-learning, you know, with the ads that we did, what worked, what didn't, who responded, how they responded, et cetera. Et cetera. And you apply that kind of learning to-' [jumps on to next point] (Interview: Wigmore/Briant, 4th October 2017).

The algorithms developed through the 'complementary workstreams' allowed them to evaluate risk for their insurance company 'imagine if you had the ability to say, this person is absolutely brilliant. We know as an insurer, it's worth giving them a good price because we know they're unlikely to make a claim, they're solid, they've got a good job, um, you know, they've got a family life, blah, blah, blah, blah, blah. So that in artificial intelligence terms is the holy grail in insurance. So that was a by-product of what we discovered, brilliantly. And that's all about data. That is all about data. So um, that was- that was the upshot. So we've set this up in Mississippi. It's been going for nine months, we've been testing for twelve months now, testing all the insurance against it and it's extraordinary.' (Interview: Wigmore/Briant, 4th October 2017). This was lucrative, Wigmore said the disparity was 'Massive. Massive. Our loss ratios have dropped by about 13 - 14 per cent. And in- in insurance terms that's millions of pounds. Millions. Because what happens, for every pound of insurance you give someone, you have to put two pounds into like an escrow account to cover just in case that person ever makes a claim. It's called solvency. Very dull, very boring. But, so if you

our data and they're the ones that pinpointed the twelve areas in the United Kingdom that we needed to send Nigel Farage to.' (Interview: Wigmore/Briant, 4th October 2017).

Phase I of Cambridge Analytica's plan seems to have been carried out with Cambridge Analytica – [the plan submitted to the UK Fake News Inquiry by Former Cambridge Analytica Business Development Director Brittany Kaiser](#) states under Phase I: 'Significant work has already been completed, and this should take no longer than ten days including sign-off from Leave.EU and its partners on the content of the political questionnaire' ~~(Interview: Wigmore/Briant, 4th October 2017)~~. The following also sounds like Phase I of the Cambridge Analytica plan: 'We started by doing the biggest poll we possibly could. We polled at least 10,000 people and found out what the main concerns were. So the main one that stood out like an absolute sore thumb was immigration and what, you know, what came up in immigration was housing, schools, overcrowding, never racism... and people didn't say they didn't say they didn't *want* immigration, they just didn't *like* immigration. Because it was changing their lifestyles.' (Interview: Wigmore/Briant, 4th October 2017).

My interview with Andy Wigmore seems to indicate that Leave.EU also deployed parts of 'Phase II' of Cambridge Analytica's plan – [Phase II involved 'online surveys'](#). He states: 'from a standing start we sent out on Facebook 'if you are interested in leaving the EU... or are you against the EU? Support us...' so people 'liked' which is nothing... can't do anything with that... OR you can *join*... and you pay money to join, so we ended up with close on 200,000 members. And a lot of, almost a third of our money - which is a lot - we spent almost £8 Million - was got from small donations. Anything from a pound to a thousand pounds in some cases. If they join... we asked them two things: would you like to be polled ...and'

EB: But this wasn't on Facebook though -

AW: 'No no no, on Facebook you recruited them, so if they clicked on a link, then they came through to our website and they filled out ...*then* you've got the data. And *that* we were using anyway but we didn't need to give it to Cambridge Analytica or anything like that.' (Interview: Wigmore/Briant, 4th October 2017).

Importantly, my evidence shows that Leave.EU copied and were able to deploy an effective campaign based on Cambridge Analytica's methods following the pitch and guidance that Kaiser gave them which raises concern about whether other entities who received a similar pitch could also have replicated their methodology, I discuss oversight below.

### **Leave.EU, UKIP, Eldon Insurance and the US Health Insurance Industry**

Andy Wigmore claimed it wasn't possible to deploy Cambridge Analytica's AI methodology without access to 'electoral roll data which you can then use [...] Because Cambridge Analytica artificial intelligence requires data - if you don't have it, you can't do it.' - this implied that they couldn't do CA's artificial intelligence because they didn't have enough data (Interview: Wigmore/Briant, 4th October 2017). But Wigmore later told me:

AW: 'So. Um, so, if you take... You talk about data. So you have a lot of data when you're an insurer. And that data is, it's, there's layers and layers and layers. You know, you have, um, ah, lifestyle data, of course you do. You have, um, credit check data which of course you do. All that data you put that together, the way you can actually then make risk against an individual is incredibly strong. So our ratios, in other words, you always say, right, if we take on this customer what are the chances of them making a claim within a twenty-four year- uh, twelve month period, twenty-four month, is it high? Because they're so de- so low social demographic grouping, they don't have a proper job, they have to take out a loan to pay for their car insurance, you can make a risk assessment of that. So makes it more expensive.' (Interview: Wigmore/Briant, 4th October 2017).

Subsequent evidence indicates that the campaign may have used both [Eldon Insurance's data and UKIP data](#). Asked about whether they might have used a political database for commercial purposes by the [Observer, Banks said 'Why shouldn't I? It's my data.'](#) Andy Wigmore confirmed in interview with me, 'We used *our* data. Gerry took *our* data, which we'd... and we started to look at polling.' (Interview: Wigmore/Briant, 4th October 2017). Both of these datasets were factored in to the [original Cambridge Analytica plan which Brittany Kaiser submitted as evidence](#) which indicates how the Leave.EU 'psychographic survey' would be used to build 'psychographic insurance'. While Andy Wigmore was happy to admit copying Cambridge Analytica's methods for the Leave.EU campaign, he sought to present the Leave.EU team's deployment of Artificial Intelligence and knowledge of how to draw on this for Eldon Insurance as an apparent happy accident resulting from their own visionary brilliance:

AW: 'Let's say the referendum's just finished. What we discovered, we were actually quite bloody good at artificial intelligence. And we've applied what we learned in the referendum to our business model for insurance. (Interview: Wigmore/Briant, 4th October 2017).

But this indicates they deployed the complementary workstreams part of [Cambridge Analytica's dual strategy](#). If, as this evidence shows, Cambridge Analytica's plan was indeed used it is hard to understand how this would not be considered a gift in kind or receipt of services, particularly as Kaiser [described seeing the datasets of the political campaign and insurance company being used in parallel](#) during her visit to their offices. My own evidence and that of Brittany Kaiser directly contradict the [conclusions drawn by the Electoral Commission](#) which declare 'the relationship did not develop beyond initial scoping work'.

The desire to take credit for developing the expertise themselves may have been because they are now selling their expertise in the United States insurance market. Wigmore explained to me: 'So for- for risk and, um, making sure you get the right person who's not gonna be fraudulent, not gonna make claims they, you know, you know so much about them. So we've started an operation in Ole Miss University in Mississippi which is the centre for artificial intelligence in the world, who knew? [...] And, and, and the guy that runs it, he's like the most extraordinary data scientist. So when we explained all our sorta, d'you know what, you should have a chat with him. When we explained what we did- [...] He thought we were completely nuts. He said, how on earth did you create? This is how we created it. He couldn't get his head around it. But, if you took the application of what we learned in, you know, learned, self-learning, you know, with the ads that we did, what worked, what didn't, who responded, how they responded, et cetera. Et cetera. And you apply that kind of learning to-' [jumps on to next point] (Interview: Wigmore/Briant, 4th October 2017).

The algorithms developed through the 'complementary workstreams' allowed them to evaluate risk for their insurance company 'imagine if you had the ability to say, this person is absolutely brilliant. We know as an insurer, it's worth giving them a good price because we know they're unlikely to make a claim, they're solid, they've got a good job, um, you know, they've got a family life, blah, blah, blah, blah. So that in artificial intelligence terms is the holy grail in insurance. So that was a by-product of what we discovered, brilliantly. And that's all about data. That is all about data. So um, that was- that was the upshot. So we've set this up in Mississippi. It's been going for nine months, we've been testing for twelve months now, testing all the insurance against it and it's extraordinary.' (Interview: Wigmore/Briant, 4th October 2017). This was lucrative, Wigmore said the disparity was 'Massive. Massive. Our loss ratios have dropped by about 13 - 14 per cent. And in- in insurance terms that's millions of pounds. Millions. Because what happens, for every pound of insurance you give someone, you have to put two pounds into like an escrow account to cover just in case that person ever makes a claim. It's called solvency. Very dull, very boring. But, so if you

imagine now actually I only need to put a pound in against two pounds because we're confident that person isn't going to make a claim...' (Interview: Wigmore/Briant, 4th October 2017). Asked about how reliable it was Wigmore said:

AW: 'Yes. This is the thing. So, in a twelve month period, you take out insurance and in the twelve month period you renew and you haven't made a claim because you're a good client and you're likely to renew because you have that type of-, and when you shop--'

EB: So, taking that back to campaign... it was *that* reliable?

AW: 'No. We only discovered that *after* the campaign when you analyse everything that happened. Why did people like-- so our polling was 0.01 percent out.'

EB: You couldn't analyse it while it was going on?

AW: 'No, we didn't know about it. It was only when we looked back and went, crikey, we've got something here. Because our polling was 0.01 percent out in the twelve weeks. 0.01 percent!' (Interview: Wigmore/Briant, 4th October 2017).

### **AI in the US Health Insurance in Rust Belt States**

Wigmore described how he continues to go to Washington once a month as Arron Banks' business partner and 'We are still doing the insurance, the artificial intelligence in Mississippi has been very interesting, really interesting, because- [...] what they are going to start to look at is healthcare because addressing an individual, you are so individual, it is like insurance -- how do you know what's wrong with that person, what kind of insurance... health insurance (because that's how America works) do you have?' (Interview: Wigmore/Briant, 4th October 2017). Wigmore said 'We've proved it in motor insurance and they are extrapolating those, these are data scientists.' Which raises the question of whether these data scientists at Ole Miss have the British data, or whether they are reverse engineering modelling and algorithms developed using British citizens' data (Interview: Wigmore/Briant, 4th October 2017).

Criticising Obamacare as 'one size fits all' and open to exploitation by insurers, he said, 'Big insurance companies, have now gone 'okay', they need to come up with something different, so the two biggest in insurance they are starting to think differently, so they are the ones who are piloted these little schemes in the rust belts, where poverty is absolutely [unclear] and actually as a benchmark for trying to sort the healthcare system, which you will never do, it's a good start, so artificial intelligence would allow those insurance companies to make their assessments quickly based on knowledge which is already there, it just needs to be gathered.' (Interview: Wigmore/Briant, 4th October 2017). Wigmore framed this in individualistic terms of helping people to help themselves and the state making provisions for prevention in the cases of high risk individuals 'every state has a duty of care' to ensure they are 'making people aware and helping them to help themselves' (Interview: Wigmore/Briant, 4th October 2017). He said what matters is 'this person smokes therefore he is high risk, therefore we need to treat him differently and pathway him differently etc. [...] based upon a much stronger knowledge.' (Interview: Wigmore/Briant, 4th October 2017). While of course preventive medicine is important, we might question whether the AI advancements may be a method to identify high risk cases for health insurance companies, among groups in poverty in the rust belt perhaps (where of course some places have been struggling with an opioid epidemic). This could be to identify risk-associated unhealthy behaviour to shift responsibility onto the individual and the state to reduce risk-associated behaviours. This raises the question of whether or how they would expect to be insured.

### **3 Oversight of Government Contracts and Relationships Between Cambridge Analytica and SCL Group**

Some of my interviews with key figures in the companies suggest that SCL's military arm and Cambridge Analytica's engagements may have been much more closely related than Oakes and, or Cambridge Analytica's former CEO Alexander Nix, like to publicly admit. And if governments genuinely didn't know how the firm was using the skills it developed in counter-terrorism in divisive elections around the world, then this was a huge failing.

My own research supports the other evidence presented during the UK parliamentary "[Fake News Inquiry](#)" apparently indicating important staffing overlaps, financial relationships and methods in common between apparently separate companies. [In testimony to the Canadian Parliament, Aggregate IQ, who worked with SCL on the Nigeria campaign, for Ted Cruz and who were contracted by Vote Leave in the UK's EU Referendum](#) said they worked with SCL, not Cambridge Analytica, on the Cruz campaign, despite Cambridge Analytica being the entity that worked on this election.

One key figure who I interviewed is Nigel Oakes, chief executive of the SCL Group discussed the relationship between the companies with me. When Oakes set up SCL Elections and Cambridge Analytica as the new political arm of SCL's business, the political 'division' worked less separately from SCL. There are reports of SCL working in [elections in Indonesia](#) in 1999. Oakes' own expertise, which emerged in PR, developed further through counter-terrorism work and shaped the Behavioural Dynamics Institute - a research unit underpinning SCL methods, and this expertise was being deployed in elections. We need to know which ones.

Oakes told me he had worked on politics "in the past. I set up the company [Cambridge Analytica] but *now*, I'm totally defense and I've gotta *be* totally defense". He said, "the defense people can't be seen to be getting involved in politics, and the State Department, they get very *upset*..." Oakes stated they imposed 'strong lines' between the companies. It seems reasonable to infer that SCL have been restating their separation to ensure survival of business interests in defense and commercial contracting, motivated in part by nervousness and pressure received from the US and UK governments wanting to contract them for defense work. [As Oakes said](#) – 'they get very *upset*'. But the reality conveyed in Oakes' account to me is that the US election brought the different arms of the company closer together. Previously Oakes and Alexander Nix had different ideas about methodology, Nix believing 'the future of behavioral changes is going to be in big data. So big data is going to be used to predict things and whatever. And I said No, the future of behavioral changes is going to be in basically HUMINT' [Human Intelligence] (Interview: Oakes/Briant, 24th November 2017). Oakes told how it was their work on the US election that led to a synergy of ideas and merging of methods that brought the companies closer:

'This is the way the companies came back together again because it does have to be both. You have to have the human element and you have to have the big data element. You got to merge them so this is what we now have. We now have uhm behavioral integration. So we've got the big data, so we got 5,000 data points on every American or whatever, which is very very cold and [unclear], how old they are, how many children they have, not very impressive data, but once you start adding in the profiles, the behavioral stuff, the models of what these people are likely to do if you segment them in this way, you now start getting into something that's very very powerful and this this is now what we're doing so- so I think Alexander Nix is right. It is big data, but we were also right. It is HUMINT, so we don't--it's not like we have to fight about it anymore.' (Interview: Oakes/Briant, 24th November 2017).

Yet in [my interview](#) with Oakes he referred to what 'we' are doing, to include Cambridge Analytica not just his defense division "...when we explain in the two-minute lift pitch what happened with Trump..." Any lack of clarity here matters – a lot. Cambridge Analytica are also stressing they do ['no work outside of North America](#), although the Cambridge Analytica brand is now used worldwide'.

I also interviewed Sam Patten, 'senior director/campaign manager' who oversaw the Nigeria campaign for SCL along with a second senior strategist. I interviewed Patten in July 2017 also about a previous job he did working for the [International Republican Institute](#) in 'reconstruction' era Iraq. He told me he had also has worked in the US, in Oregon, during one of the trial runs of Cambridge Analytica's early deployment of psychographics, later deployed more fully in the Cruz campaign. He talked about preparations for this, "they were training a team, I was part of that team... they [...] trained me in England then they sent me to Canada for more training," then he developed messaging for the US campaigns (Interview: Patten/Briant, 23rd July 2017). The Canada-based company [Aggregate IQ were reported in the Guardian as having links to SCL but have sought to distance themselves from that company](#). Patten observed of the United States, 'I've worked for Ukraine, Iraq, I've worked in deeply corrupt countries, and our system, isn't very different' (See [Explanatory Essay 1 from my UK Fake News Inquiry Evidence](#)).

SCL Group's reputation seemed something of an open secret among some of my contacts in Washington DC information warfare and political campaign circles. This is conveyed in Patten's flippant comments about a job with SCL: 'Anyway, the irony was... because it was SCL I assumed it was the bad guys, but it wasn't!'

Siloing activities or divisions off can be helpful when a company grows rapidly into new areas, for many reasons. Staff, like Tatham, in the original company, and the Behavioural Dynamics Institute (BDI), SCL Group's 'research institute', are not homogenous, and there are some distinctions culturally between those with careers originating in defense and those not. Not all of these individuals wished to work with Cambridge Analytica, not all shared the political motivations represented in the lucrative new contracts.

Siloing in companies engaged in nefarious or secretive activities of the kind [Channel 4](#) revealed can also help manage potential for leaks and exposure. Regardless of how or why Oakes and his business partners may have ultimately organised the companies or 'divisions' to perpetuate their activities (somewhat) separately, the point is that there is a network of companies, with SCL Group central to it, which is responsible for a collection of worrying activities and pitching defense-derived methods to shady international actors. I would argue that, given the above evidence, particularly Oakes' interview and Kaiser's reporting and testimony, in order to understand and evaluate these activities we must at least consider the related yet somewhat-autonomous companies' activities alongside each other, rather than in isolation, including:

- Assisting the campaigns of politicians using racist and violent video content designed to drive fear and intimidate voters in fragile states ([Cambridge Analytica and Aggregate IQ](#))
- Spreading Islamophobic and false narratives in the West including the 2016 US election and which was copied for the EU Referendum by Leave.EU (Cambridge Analytica - [see my Explanatory Essay 1](#)). These narratives drive fear of Muslims which is used to justify calls for more spending on 'counter-terrorism' (Briant, 2015).
- Profiting from Western governments interventions ostensibly to resolve (often religious and ethnic) conflicts, for counter-terrorism and counter-extremism ([see my last book](#))

These are not unrelated activities.

When we consider the work of the overall group, these activities might variously be considered to drive instability in precarious democracies, drive fear of Muslims in the West and internationally, then profit from both wars against Muslim countries and Muslims' marginalisation in the West, while claiming to 'counter' extremism.

This Committee should now consider the extent to which Nigel Oakes, as SCL Group CEO and founder of SCL, should share responsibility along with Cambridge Analytica's former chief executive Alexander Nix, now Director of [Emerdata, a new Mercer-backed company](#).

Oakes and his colleagues have spent many years studying extremism and terrorism including interviewing terrorists themselves. All of this social science and Human Intelligence work has been fed into BDI's research core, which can be drawn on by all the companies. While he worked for SCL Group's company 'IOTA Global', Steve Tatham [claimed](#) that:

'The BDI methodology uses the most advanced social science research to measure populations and determine, to a high degree of accuracy, how population groups may respond under certain conditions. The methodology is the only one of its type and has been verified and validated by the US Defense Advanced Research Projects Agency (DARPA), the Sandia National Laboratories (USA) and the UK's Defence Science and Technology Laboratories (DSTL).'

Oakes said to me, of the BDI social science research core - 'without *this* [Alexander Nix] couldn't do any of that!' (See [Explanatory Essay 3 from my UK Fake News Inquiry Evidence](#)). The companies were well equipped to understand what might drive extremism from their shared research base. And indeed the impact of the 'othering' or violent and terrifying ads deployed in domestic and international campaigns. My evidence shows Oakes is not naïve to the kind of campaigns Cambridge Analytica and his SCL Group deployed in the US.

This case has further deeply important implications for the UK government's defense contracting. In her [testimony](#) Brittany Kaiser, former Development Manager for Cambridge Analytica said that:

'I found documents from Nigel Oakes, the co-founder of the SCL Group, who was in charge of our defense division, stating that the target audience analysis methodology, TAA, used to be export controlled by the British Government. That would mean that the methodology was considered a weapon—weapons grade communications tactics—which means that we had to tell the British Government if that was going to be deployed in another country outside the United Kingdom. I understand that designation was removed in 2015.'

Interestingly, August 2015 is when SCL stopped being SCL Ltd and started being SCL 'Group' Again, Kaiser too refers to 'our defense division' - not a separate company. And regarding other aspects, the US government's [Defense Advanced Research Projects Agency](#) (DARPA) worked with BDI during the 'War on Terror', developing methods together (see Explanatory [Essay 3](#)). If the methodologies BDI developed might have informed tactics deployed in democratic elections this is very serious, whether or not the tools were 'effective' or what specifically they were used for. It is *vital* that our governments, including research entities like DARPA, build into contracts more control over tools and weapons they help to create. They must not escape responsibility when private organisations extend these, to be developed beyond the original defense work. This must also apply when they are unofficially working together, but not contracted.

Furthermore, it seems highly improbable that British and US intelligence agencies would not have been monitoring destabilising activities in Kenya, Nigeria, Indonesia and other states with a precarious state of peace and with vulnerable democratic systems. It is their job to anticipate developing conflicts and instability in countries such as these. They also often maintain awareness of any potential security weaknesses, liabilities and conflicts of interest in the background and business of individuals working in national security. We should therefore ask how much they, and the State Department and the Pentagon in the US, and the FCO and MoD in the UK, and indeed NATO, might have known about other companies in this 'Group'. It is vital that anyone with additional evidence that illuminates these questions further comes forward as a priority.

My evidence shows that SCL Group had experienced some pressure from Western governments to make the 'political' companies more separate from the government contractor, concern that implies

at least some knowledge that there may be something to be worried about. If so, to what extent did the policy of pushing them for separation, rather than dropping them as a defense contractor, allow SCL to continue their unethical practices? It would be extremely serious if our governments turned a blind eye to unethical work with the potential to destabilise vulnerable nations and potentially trigger future conflicts in which our military might be deployed. At the very least there was poor evaluation of risk and weak oversight, particularly in determining whether the actions of the SCL Group might undermine British and American interests abroad.

Importantly, my evidence shows that Leave.EU copied and were able to deploy an effective campaign based on Cambridge Analytica's methods following the pitch that Kaiser gave them. This raises questions of whether other entities who received a similar pitch could also have replicated the methodology - this is of particular importance in relation to Lukoil for example, [a Russian state-owned company that Cambridge Analytica pitched their methods to](#) around the time SCL were delivering training in methods to Eastern European countries to 'counter the Russian threat'.

We know also of course that CA sought cooperation with WikiLeaks to aid distribution of the leaked DNC emails. Nix publicly stated [they approached Assange](#) in early June 2016 but recently insisted at the [UK Fake News Inquiry](#) that he has "never spoken to them." This is unlikely as Nigel Oakes, told me that, "Alexander, if he got the release... of the Hillary Clinton emails it would have *dramatically* pushed her down in the polls. But there's nothing wrong with that... that's perfectly legitimate, Julian Assange was releasing things every day and Alexander rang up and said, you know, 'Any chance we can help you release the Hillary Clinton things?'" (Interview: Oakes/Briant, 24th November 2017).

Testimony by Glenn Simpson to the House Intelligence Committee indicated Nigel Farage may have provided Assange with the original [USB stick](#). In his testimony Simpson claims WikiLeaks was part of a "somewhat unacknowledged relationship" between the Trump team and the "UKIP people." The FBI investigation has been scrutinizing CA's interactions with WikiLeaks, Russian ties, and whether CA knew more. Assange [tweeted](#) in 2017 confirming "an approach by Cambridge Analytica [prior to November last year] and can confirm that it was rejected by WikiLeaks." When asked about the wisdom in attempting to help Assange given the leaks may have come from Russian sources, Oakes said "At the time, at the time, you didn't know there was an- ... that anyone's ever going to mention the Russians." He continued defending the decision to approach Assange saying the Russians weren't yet in the media, "In hindsight ... remember, this is 18 months before ... and it was a year before the election. No-one had *been* in the press." (Interview: Oakes/Briant, 24th November 2017). Oakes' claims their contact with Assange may have been 12 –18 months before the November 2016 election, far earlier than Nix stated and before they were working on the campaign, raises questions of a longer term relationship with Assange.

There must be inquiry into the process of procurement and oversight of government contracts as the implications of all this when considered together are very serious. Most importantly the actions of a 'group' of related but apparently autonomous companies *must* be treated as relevant, not just considering the contracted company in isolation, the group must be continuously monitored. We cannot allow this to happen again.



**CA** Cambridge  
Analytica

| **scl** group

Leave.EU: Profile Raising and Outreach

# BIG DATA SOLUTIONS FOR THE EU REFERENDUM

Cambridge Analytica is the world's foremost provider of data-driven political campaign solutions.

We have over twenty-five years of global political experience, and have worked on over 200 national and local races in over 50 different countries with an unrivalled track record of supporting our clients' campaigns.

Our methodology is driven by data. The more you know about someone, the more you can understand the best way to engage them. And it is increasingly the case that voters don't easily fit into the traditional boxes of party supporters, especially when it comes to issues-based referenda.

Cambridge Analytica's Behavioral Microtargeting™ goes beyond demographics, enabling your campaign to identify potential supporters irrespective of where they live or any demographic traits that may have led political parties to overlook them in the past.

We use vast amounts of data, including consumer histories, lifestyle information, census returns, and historical voting records to construct advanced profiles of individual voters.

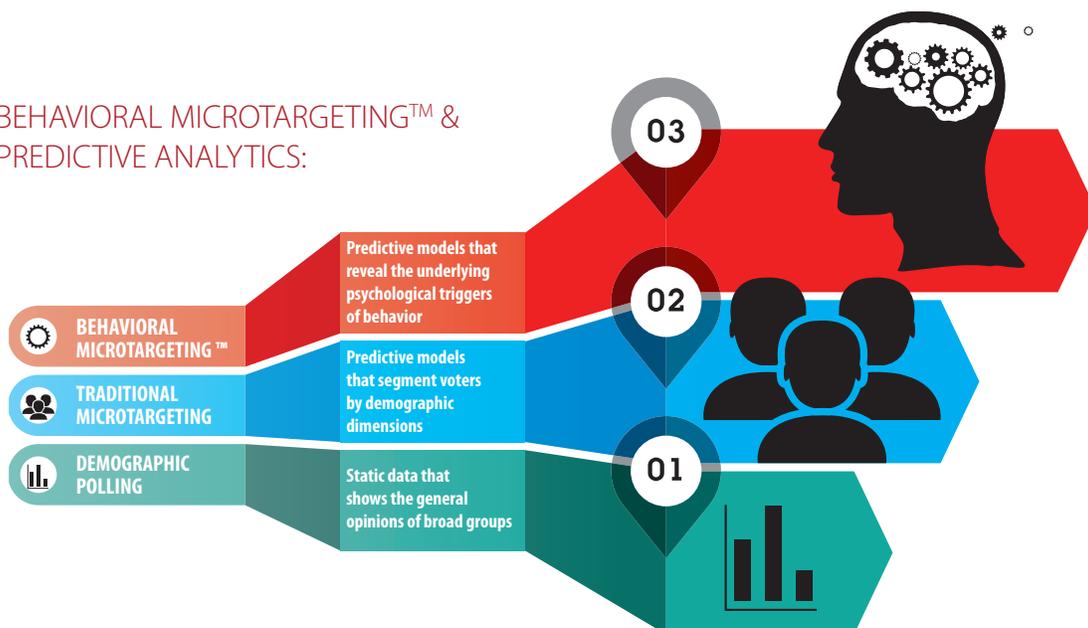
We use state-of-the-art psychological analysis to quantify voter behavior and design campaign messaging strategies accordingly, and our voter profiles include detailed insight into how likely voters are to turn out, how persuadable they are, and the issues that are most important to them.

These profiles provide campaigns with a complete portrait of target groups, allowing you to better understand your traditional supporters as well as how to identify and engage new enthusiasts.

Our political messaging specialists help your campaign design messages that speak directly to your target voters' unique profiles, helping you to forge a connection with supporters that will produce real electoral results.

Behavioral Microtargeting™ represents the next generation of voter messaging and mobilisation.

## BEHAVIORAL MICROTARGETING™ & PREDICTIVE ANALYTICS:



# WHAT MICROTARGETING WILL DO FOR YOU

---

Voters and businesses alike see the coming referendum as an opportunity to voice their concerns over issues caused by Britain's membership of the EU. Whether it is regulations, border controls or Britain's international profile, British people have real worries about the EU's impact on their lives and businesses. As such, the coming months will be an important period for the Leave.EU campaign as it seeks to show the public that it represents a serious position on the EU that is separate from the vested interests of frequently out-of-touch politicians.

To do this, Leave.EU must identify the types of people likely to support a 'Leave' campaign, whether they are journalists, businesspeople, politicians or ordinary voters, and capture their attention.

## Cambridge Analytica can help you do this.

From turnout propensity to issue salience to communications channel selection, we can provide Leave.EU with a holistic campaign design that will maximise your chances of being successfully selected by the Electoral Commission and then give the 'Leave' campaign the best possible chance of winning the referendum.

Our powerful predictive analytics and campaign messaging capacity can help you to segment and message the population according to a range of criteria:

### TURNOUT

Groups based on likelihood to turn out to vote in particular elections

### PRIORITY ISSUES

Groups based on voter's priority top-line issues (eg. National Security) and nuanced views (eg. National Security – Defending the border)

### PARTISANSHIP

**General Voter** – groups based on propensity to vote in the referendum

**Ideological Voter** – groups based on ideological perspectives on Britain's EU membership

**Opposition Voter** – groups to dissuade from political engagement or to remove from contact strategy altogether

### PSYCHOGRAPHIC CLUSTERS

Groups based on voter's personality traits and demographic data

### PERSUADABILITY

Groups based on voter's propensity to be persuaded based on all data held on the individuals.

### FUNDRAISING

Groups based on potential to donate to different parties, candidates, and causes

### CONTACT STRATEGY

Groups based on the most effective channels (email, web advertisements, direct mail etc) to reach target voters and potential donors

# IDENTIFYING & MOBILISING SUPPORTERS

---

This proposal outlines the scope of work that we propose to undertake in support of Leave.EU's goals.

Over the coming months, our primary objective will be to ensure that Leave.EU is selected by the Electoral Commission as the official campaign on the 'No to EU' side. Only once that has been accomplished can focus shift to enlarging the scope of the supporter engagement campaign in order to ensure that the campaign's ultimate goal is achieved and that the United Kingdom leaves the European Union.

This proposal focuses on the steps necessary to achieve Electoral Commission selection, and does not deal with workstreams during the general campaign despite the fact that Cambridge Analytica would be delighted to continue supporting this effort. We believe, however, that in the short term it is important to focus on the task at hand.

**As such, Cambridge Analytica has designed a two-phase programme of work that will engage key stakeholders and demonstrate the innovative and powerful nature of Leave.EU's campaign in advance of the Electoral Commission's decision.**

**Phase I**, which involves a short programme of data analytics and creative support, is specifically designed to enable Leave.EU to showcase its intellectual capacity and robust, data-driven approach to campaigning during the series of presentations scheduled for November 17th and 18th. The products of Phase I will be a comprehensive plan for further research and data analytics on a larger scale, as well as sample creative products across multiple formats (digital, print, audiovisual) that will begin to illustrate to observers that Leave.EU has the capacity to execute a powerful, exciting and technologically advanced national campaign.

Building on the initial phase, **Phase II** will involve a pilot microtargeting project in one geographic area, which will provide Leave.EU with a deeper understanding of the dynamics at work across the UK in terms of views on Europe and voting intentions. Additionally, this pilot project will provide further evidence of Leave.EU's capacity to successfully mobilise supporters and convince swing voters, further underlining to the Electoral Commission and others that Leave.EU is the premier 'Leave' campaign.

The products of Phase II will be a comprehensive report on target audiences identified, as well as an online voter engagement platform that will allow Leave.EU to target specific voters based on their interests and voting intentions.

In parallel with Phase II, we will coordinate a programme of targeted donation solicitation, using digital advertising and other media as appropriate to raise funds for Leave.EU in the UK, USA and in other countries.

# PHASE I: DATA MATCHING, ANALYTICS & STRATEGY

---

Leave.EU's main priority during the initial stages of this campaign should be convincing journalists, donors, politicians and the Electoral Commission that they are the 'Leave' campaign that best represents those who wish to restore Britain's independence from the EU.

With that objective in mind, Cambridge Analytica proposes a short programme of data integration and analytics that will enable the campaign to better understand its existing supporters and to begin designing its messaging strategy.

Working with the data that Leave.EU and its allies have already collected from supporters, we can analyse voters' viewpoints and provide summarised insights that will help you to understand their motivations and interests. These insights will then form the basis for the development of a series of sample creative pieces, including static and audiovisual digital advertising and mail products, which will be designed to appeal to specific segments of Leave.EU's support.

Finally, we will collaborate with Leave.EU and its partners to develop a presentation that can be delivered to stakeholders on the 17th and 18th of November. This presentation will show viewers the depth of talent supporting Leave.EU, as well as the innovative data analytics and creative development that the campaign will be deploying.

## VOTER GROUP ANALYTICS REPORTS FOR STRATEGY PRESENTATION

### **Analysis of voter universe:**

- Briefing packs on predetermined supporter segments
- High-level message creation
- Design of research methodology and strategy for Phase II

# PHASE I: ESTIMATED TIMEFRAME & BUDGET

The deadline for Phase I of this project is Monday November 16th, with presentations November 17 & 18.

**Key Cambridge Analytica critical path tasks:**

- Receive and integrate house file data; identify suitable supporter target audiences
- Develop digital marketing materials and messaging content for the showcases on November 17 and 18th, inclusive of creative guidelines and sample materials production

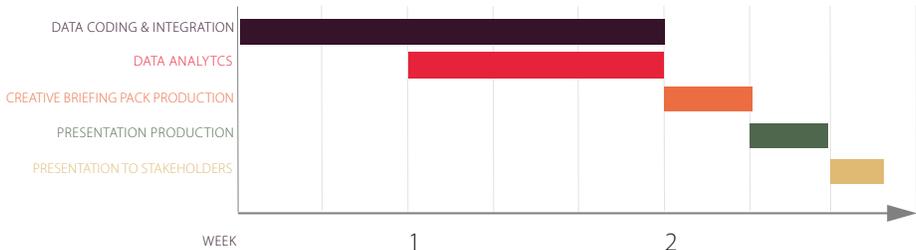
**Requirements from the Leave.EU campaign:**

- House file of supporters, members, and subscribers - *delivery scheduled for Tuesday Nov 3rd*
- Access to digital outreach resources, including Facebook page and other social media accounts
- Branding creative: logo, graphic elements, color palette, images, taglines and phrases
- Priority campaign issues
- Co-ordination process to integrate the campaign's contacts and online presence for digital outreach (e.g. web user flow, landing pages, sign-up process) and mail vendors

**Additional reporting deliverables:**

- Two presentations/briefing sessions on results and analysis of findings
- Forward strategy documents to be produced for use in stakeholder meetings

## PROPOSED TIMELINE



## ESTIMATED BUDGET

PHASE I					
<i>Data Integration &amp; Creative Production</i>					
Project Manager	£1,200.00	1	5		£6,000.00
Senior Data Scientist	£1,500.00	1	9		£13,500.00
Junior Data Scientist	£1,000.00	2	5		£10,000.00
Data Engineer (Integration of house file with secondary data sources)	£1,000.00	1	2		£2,000.00
Political Messaging Specialist	£1,000.00	1	1		£1,000.00
Creative Director	£1,500.00	1	1		£1,500.00
Graphic Designer	£500.00	2	3		£3,000.00
Senior Responsible Director (Presentation)	£1,500.00	1	3		£4,500.00
<b>Total</b>					<b>£41,500.00</b>

## PHASE II: TAA & MICROTARGETING PILOT

---

In order to build on the work undertaken in Phase I, we propose a multi-faceted approach to Phase II.

The first part of this phase, which will be centred on a particular geographic area (likely a parliamentary constituency), will involve a programme of **Target Audience Analysis**, whereby qualitative and quantitative research is conducted in order to segment the population into target audiences according to their views, motivations and interests.

The second part of Phase II, **Political Microtargeting**, involves the use of secondary data sources and advanced analytics to assign values on particular traits to the entire voting population of the area in question. This will allow for the target audiences to be resegmented and contacted as required over the course of the campaign, and the use of this data will be facilitated by the deployment of an online database utility created by Cambridge Analytica for Leave.EU.

### TARGET AUDIENCE ANALYSIS (TAA)

Target Audience Analysis (TAA) is one component of Cambridge Analytica's unique methodology, and enables a comprehensive understanding of the opinions and motivations of key audience groups. More specifically, it offers a unique insight into the public's perception of key political issues and underlying motivations for voting behaviour including sociological and psychological factors.

TAA begins with the collection of qualitative data through interviews and focus groups, which allow us to identify key issues and political attitudes that will be tested during the subsequent quantitative phase. Cambridge Analytica's quantitative research methodology involves a large-scale survey, conducted online and/or via canvassing and telephone, which gathers large volumes of data on key issues and political opinions, as well as underlying motivations for behaviour such as propensity for change, normative sociological affiliation and other factors.

This data is then analysed by our in-house team of data scientists and statisticians to define Target Audience Profiles, which are descriptions of population segments that can be grouped together based on their shared characteristics. To do this, our scientists feed quantitative and qualitative data through a series of sociological, political and psychological parameters, identifying trends and grouping the population accordingly. In most cases this results in the definition of 4-6 Target Audience Profiles, though the number is entirely dependent on the population and issues being studied.

Each of these profiles will outline the views and motivating factors driving behaviour amongst group members, and will also outline the messaging strategies most likely to be effective in influencing them to support the Leave.EU campaign.

The end result of this process is a comprehensive plan for influencing voters likely to be receptive to Leave.EU's positions and messages. This plan will include guidance on messaging including slogans and visuals, appropriate channels (digital, mail, etc.) and scheduling, which together constitute a holistic strategy that will give Leave.EU the best chance of success.

## POLITICAL MICROTARGETING

Building on the insight contained in Target Audience Profiles, Cambridge Analytica's Political Microtargeting methodology assigns values relating these profiles to individuals. While particular data protection regulations and the availability of secondary data sources will dictate the extent to which this is possible (and as such this Phase has not yet been costed), Political Microtargeting is a process whereby individuals across a voter population are predictively modeled to understand where they fit amongst the Target Audiences identified by our research. This predictive modeling can also indicate what issues they care about, and other factors likely to be salient in shaping voting behaviour.

**What this process offers is the opportunity to target communications at the scale of the individual.**

In other words, Leave.EU will be able to ensure that every piece of digital or print advertising sent out is directed at somebody who cares about the particular issue, or is likely to respond positively. This means that your campaign can save money that would otherwise have been spent contacting voters who are vehemently pro-EU, and direct those resources into making more frequent contact with swing voters and supporters you wish to mobilise as donors or volunteers.

To assist Leave.EU with using this wealth of information, Cambridge Analytica will develop a bespoke online database tool with intuitive controls and powerful visualisation capacity. This will help campaign staff to understand their audiences and plan strategy accordingly. New audiences can be identified using the database querying tool, and pre-formatted Target Audiences can be displayed geographically or according to other factors, all enabling a thorough understanding of the campaign and putting Leave.EU in the global vanguard of data-driven political campaigning.

**connect**

connect is our voter database utility, which helps you segment, view and understand your target audiences.

## TARGETED FUNDRAISING

Alongside the TAA and Political Microtargeting programmes described on the preceding pages, Cambridge Analytica will also design and execute a programme of donation solicitation amongst individuals interested in Britain's EU status.

These could include both corporate and individual targets in the United States, UK or other Commonwealth countries. Depending on budget and required specifications, this programme would make use of targeted digital advertising, direct mail, telephone marketing and other methodologies as appropriate to solicit campaign financing from individuals willing to support a campaign for Britain's independence from the European Union.

Cambridge Analytica has significant experience designing and executing donation programmes, and we can handle the entire process from the development of creative pieces and design of targeting frameworks to the scripting of telephone calls and production of digital animations and donation collection websites.





---

NEW YORK: The News Corp. Building, Suite 2703, 1211 Avenue of the Americas, New York, NY 10036, United States of America | Tel: +1 (646) 892 - 9591  
WASHINGTON: 1 Wales Alley, Alexandria, VA 22314, United States of America | Tel: +1 (703) 997 - 1812  
E-mail: [info@cambridgeanalytica.org](mailto:info@cambridgeanalytica.org) Website: [www.cambridgeanalytica.org](http://www.cambridgeanalytica.org)

---

Registered in America at Corporation Service Company, 2711 Centerville Road, Suite 400, City of Wilmington, County of New Castle, Delaware, 19808

The content within this document is proprietary data and business confidential in nature. The use of any information contained in this document, (i.e., the charts, graphs, tables, text and diagrams) for any reason other than the evaluation of the capability of Cambridge Analytica and its partners' technical and business capabilities, without the written permission of Cambridge Analytica, is strictly prohibited. Any analysis data enclosed in this document shall not be disclosed without the consent of the company's principals and shall not be duplicated, used, or disclosed - in whole or in part - for any purpose other than to evaluate Cambridge Analytica's capability to perform the functions and services described in this document. All original content in this document is © Cambridge Analytica, 2015.