Forensic Brief 11: Voters for Hillary – The Super PAC Fraud

A $10.7 Million Securities Manipulation and Round-Trip Transaction Scheme Executed While Under Federal Indictment (2014–2015)

February 11, 2026

I. EXECUTIVE SUMMARY

Between 2014 and 2015, while Kyleen Cane was on federal pre-trial release for a $300 million pump-and-dump conspiracy, she participated in a sophisticated securities manipulation scheme involving a "Super PAC" vehicle titled **Voters for Hillary**. The scheme utilized political momentum surrounding Hillary Clinton's 2016 presidential announcement to artificially inflate the stock price of **CrossClick Media (XCLK)**, a worthless penny stock trading as low as $0.0001 per share.

The scheme's architecture demonstrates the enterprise's sophisticated exploitation of legitimate institutional frameworks. Milton Ault III served as PAC chairman while his wife, Kristine Ault, controlled MCKEA Holdings—CrossClick's majority shareholder. This familial control structure enabled coordinated manipulation: the PAC created the false appearance of a $10.7 million contract with CrossClick, while $73,000 in round-trip transactions provided documentary evidence of business activity that served no legitimate purpose.

The PAC's capital structure was unprecedented in the 2016 election cycle. According to campaign finance expert Brett Kappel, no other super PAC received more in loans or relied on loans for such a large percentage of its revenue. The lenders included individuals with documented securities fraud connections: Cane ($10,700 while under federal indictment), Judson Church ($250,000—a registered Republican funding an ostensibly pro-Clinton PAC), and Mary Coons (whose spouse was barred by SEC for market manipulation). Interest rates reached 18 percent—usurious rates demonstrating the PAC functioned as a commercial vehicle rather than a political organization.

The manipulation succeeded: CrossClick's stock surged twelve-fold (1,200% increase) by May 6, 2015, with tens of millions of shares trading hands as retail investors bought based on false appearances of political legitimacy. When the stock collapsed to near-worthlessness, the PAC simply ceased filing required FEC disclosure forms (July 2015), abandoning regulatory compliance once the fraud had concluded. Federal campaign reports confirmed the PAC spent zero dollars on political candidates or issues—it existed solely to facilitate securities fraud.

This brief documents the enterprise's continued operation during pending federal prosecution, establishing a "pattern of racketeering activity" that transcended any single indictment. The methodological parallels to the Discala case for which Cane was under indictment—worthless penny stocks, false legitimacy through organizational structures, coordinated control, retail investor victimization—demonstrate that pending prosecution was insufficient to disrupt enterprise operations.

II. PRINCIPAL ACTORS

Name	Role	Period	Key Evidence
Kyleen E. Cane	PAC Lender / Creditor	2014–2015	$10,700 loan while under federal indictment; FEC Filings
Milton Ault III	PAC Chairman	2014–2015	Chairman of Voters for Hillary; husband of Kristine Ault
Kristine Ault	Controlling Shareholder	2014–2015	Managing member of MCKEA Holdings (CrossClick majority)
James Hodgins	Enterprise Facilitator	2014–2015	Managing member of Finiks Capital; general partner MCKEA
Judson Church	PAC Lender	2014–2015	$250,000 loan (registered Republican to pro-Clinton PAC)
Mary Coons	PAC Lender	2014–2015	Spouse barred by SEC for market manipulation
Gary Gottlieb	CrossClick Executive	2014–2015	Confirmed Ault takeover timing; coordination
Abraxas Discala	Co-conspirator (CodeSmart)	2013–2014	Parallel methodology in EDNY indictment

---

III. THE SCHEME: XCLK AND THE SUPER PAC VEHICLE

A. The Formation of "Voters for Hillary"

On June 30, 2014—seventeen days before Cane's federal indictment was unsealed—the "Voters for Hillary" Super PAC was registered.[1] The PAC was initially established in 2014 as the "Foundation for a Greater America" before being renamed.[2] The PAC

[1] ProPublica, *The Hillary Clinton Super PAC That Wasn't* (Dec. 18, 2015), https://www.propublica.org/article/the-hillary-clinton-super-pac-that-wasnt [hereinafter *ProPublica Investigation*].

[2] *ProPublica Investigation*, *supra* note 1 (stating PAC was "created in 2014 as the Foundation for a Greater America").

was ostensibly designed to support Hillary Clinton's presidential run but was in fact controlled by principals associated with the Cane-Wallace enterprise and individuals with documented securities fraud histories.

According to the ProPublica investigation, federal campaign reports indicate that Voters for Hillary spent no money supporting Clinton or any other candidate.[3] The great majority of approximately $500,000 it raised before Clinton announced came in the form of loans, not donations, with most lenders being registered Republicans.[4] This unprecedented capital structure served no legitimate political purpose but instead created the framework for a coordinated securities manipulation scheme.

B. The Corporate Control Structure

The scheme's effectiveness depended on coordinated control of both the PAC and CrossClick Media. According to CrossClick's filings with the Securities and Exchange Commission, the controlling shareholder was Carson City, Nevada-based MCKEA Holdings, with Kristine Ault (wife of PAC chairman Milton Ault III) as managing member.[5] This direct familial connection between the PAC's leadership and CrossClick's controlling shareholder demonstrates the coordinated nature of the scheme.

Another major shareholder of CrossClick was Finiks Capital LLC, a Newport Beach, California-based firm whose managing member was James Hodgins.[6] Hodgins' LinkedIn page also described him as a general partner of MCKEA Holdings.[7] According to CrossClick executive Gary Gottlieb, Kristine Ault's company became CrossClick's controlling shareholder in October 2014, and Milton Ault pitched the idea of a major deal with the PAC at that time.[8]

C. The Unprecedented Loan Structure

The PAC's capital structure was extraordinary and unprecedented in the 2016 election cycle. According to ProPublica's analysis of FEC filings, no other super PAC active during the 2016 cycle received more in loans or relied on loans for such a large percentage of its revenue.[9] Only five PACs active during the 2016 cycle received six figures in loans, and Voters for Hillary was the only one to already begin repaying them.[10] Campaign finance expert Brett Kappel stated he had never encountered a PAC with such a loan-heavy capital structure.[11]

The lenders included individuals with documented securities fraud connections:

Table 2. PAC Lenders and Securities Fraud Connections

Lender	Amount	Background
Judson Church	$250,000	Registered Republican; largest single loan to ostensibly pro-Clinton PAC
Kyleen E. Cane	$10,700	Under federal indictment for $300M pump-and-dump scheme
Mary Coons	Unknown	Spouse barred by SEC for market manipulation
Finiks Capital LLC	$242,000	Received loan FROM PAC (initially undisclosed); managing member also general partner of MCKEA Holdings

According to Milton Ault's statement to ProPublica, the PAC's lenders were looking to profit from the interest rates the committee agreed to, which were as high as 18 percent.[12] This usurious interest rate structure—far exceeding typical political fundraising arrangements—demonstrates the PAC functioned as a commercial vehicle rather than a legitimate political organization.

D. The Round-Trip Transactions

The scheme's mechanics centered on creating the false appearance of legitimate business activity through circular financial flows. According to the financial records examined by ProPublica, the PAC paid CrossClick Media approximately $73,000 for purported call center services.[13] In the months after Hillary Clinton announced her presidential candidacy, CrossClick paid roughly the same amount back to the PAC.[14] This circular flow of funds served no legitimate business purpose but created the false appearance of business activity that artificially inflated CrossClick's stock price.

CrossClick's press releases issued for months before Clinton's announcement stated the company had won a contract to run call centers and other services for Voters for Hillary.[15] CrossClick's chief executive declared in December 2014 that getting hired by the PAC was "a milestone" leading to growing revenue "predicated largely on Ms. Clinton becoming a Presidential candidate."[16]

[3] *Id.* (stating "federal campaign reports indicate that Voters for Hillary spent no money supporting Clinton or any other candidate").

[4] *Id.* (stating "the great majority of about $500,000 it raised before Clinton announced came in the form of loans, not donations, most from registered Republicans").

[5] *See* SEC EDGAR, CrossClick Media, Inc., Form 10-K (filed Nov. 2, 2015) (CIK 0001487659), https://www.sec.gov/Archives/edgar/data/1487659/000126246315000678/xclk10k2014.htm (disclosing MCKEA Holdings as controlling shareholder with Kristine Ault as managing member); *ProPublica Investigation*, *supra* note 1.

[6] *ProPublica Investigation*, *supra* note 1 (identifying James Hodgins as managing member of Finiks Capital LLC).

[7] *Id.* (stating "Hodgins' LinkedIn page also describes him as a general partner of Mckea Holdings").

[8] *Id.* (quoting CrossClick executive Gary Gottlieb stating Kristine Ault's company became CrossClick's controlling shareholder in October 2014 and Milton Ault pitched idea of major deal with PAC).

[9] *Id.* (stating "no other super PAC active during the 2016 cycle received more in loans or relied on loans for such a large percentage of its revenue").

[10] *Id.* (stating "only five PACs active during the 2016 cycle received six figures in loans, and Voters for Hillary was the only one to already begin repaying them").

[11] *Id.* (quoting campaign finance expert Brett Kappel stating he had never encountered a PAC with such loan-heavy capital structure).

[12] *Id.* (quoting Milton Ault stating lenders were "looking to profit from the interest rates the committee agreed to, which were as high as 18 percent").

[13] *Id.* (stating PAC paid CrossClick approximately $73,000 for purported call center services).

[14] *Id.* (stating "in the months after Hillary Clinton announced her presidential candidacy, CrossClick paid roughly the same amount back to the PAC").

[15] *Id.* (stating "CrossClick issued statements for months saying it had won a contract to run call centers and other services for Voters for Hillary").

[16] *Id.* (quoting CrossClick CEO declaring in December 2014 that PAC contract was "a milestone" leading to revenue "predicated largely on Ms. Clinton becoming a Presidential candidate").

E. The XCLK Link and Market Manipulation

CrossClick Media (XCLK) was a Nevada corporation (CIK 0001487659) represented by Cane Clark LLP.[17] According to the ProPublica investigation, CrossClick had about 170 million shares outstanding in mid-2014, trading at a price as low as a hundredth of a cent ($0.0001).[18] The stock was worthless, with no legitimate business operations.

In early 2015, XCLK announced that the Super PAC had pledged $10.7 million to support its marketing efforts. According to posts on Internet message boards popular with penny stock investors, excited commentary about CrossClick's bright future began filling sites like InvestorsHub.[19] One March 28, 2015 post stated: "Soon the 1st lady announces her candidacy and it's on like Donkey Kong. Hope you have some shares :)"[20]

F. The "Pump" Phase and Stock Price Manipulation

Following Hillary Clinton's official announcement on April 12, 2015,[21] CrossClick's stock price surged dramatically. The promotion exploited legitimate public interest in Clinton's presidential campaign to drive retail investor demand. According to stock market data:

- The number of outstanding shares grew as the political season began, increasing from 170 million to 2.6 billion by the end of April 2015.[22]
- By May 6, 2015, the stock had risen approximately twelve-fold—a 1,200% increase.[23]
- Tens of millions of shares traded hands on some days during the spike, meaning anyone who sold at the peak could have made tens of thousands of dollars in profits.[24]
- CrossClick's shares subsequently collapsed back to being nearly worthless.[25]

This price movement pattern is the textbook definition of a pump-and-dump scheme: artificial inflation through false information, followed by insider selling at inflated prices, leaving retail investors with worthless shares.

G. FEC Violations and Regulatory Evasion

The scheme included systematic violations of federal campaign finance law. According to FEC records, the PAC failed to initially disclose the $242,000 loan to Finiks Capital LLC—a major CrossClick shareholder whose managing member was also a general partner of CrossClick's controlling shareholder.[26] This omission concealed the direct financial flows between the PAC and entities that stood to profit from CrossClick's stock manipulation.

The PAC ceased filing required financial disclosure forms in July 2015,[27] immediately after CrossClick's stock collapsed from its May 2015 peak. According to the ProPublica investigation, the FEC fined Voters for Hillary $9,800 for one of its blown deadlines, but public filings reveal no action for other missed filings, omissions, and oddities.[28] The FEC caught the initially unreported loans and demanded an explanation, but the PAC never responded and FEC records show no follow up.[29]

This cessation of regulatory compliance demonstrates the PAC served no purpose beyond facilitating securities fraud. Once the stock manipulation scheme had concluded and retail investors had been defrauded, the organizational structure was simply abandoned.

H. Pattern of Racketeering Activity: Execution During Pending Federal Prosecution

The timing of this scheme is particularly significant for establishing a pattern of racketeering activity. Kyleen Cane's participation in providing a $10,700 loan to the Voters for Hillary PAC occurred while she was under federal indictment for her alleged role in a $300 million pump-and-dump scheme defrauding elderly investors.[30] The indictment in *United States v. Discala*, Case No. 14-cr-399 (E.D.N.Y.), alleged that defendants concealed their ownership interests, released false press releases, and issued misleading SEC filings.[31]

The parallel between the Discala case and the SuperPAC scheme is precise:

[17] *See* SEC EDGAR, CrossClick Media, Inc., Form 10-K (filed Nov. 2, 2015) (CIK 0001487659), https://www.sec.gov/Archives/edgar/data/1487659/000126246315000678/xclk10k2014.htm.

[18] *Id.* (stating "CrossClick had about 170 million shares outstanding in mid-2014, trading at a price as low as a hundredth of a cent").

[19] *Id.* (stating "excited commentary about CrossClick's bright future began filling sites like InvestorsHub").

[20] *Id.* (quoting March 28, 2015 InvestorsHub post).

[21] *Id.* (stating Hillary Clinton announced presidential candidacy on April 12, 2015).

[22] *Id.* (stating outstanding shares "increasing to 2.6 billion by the end of April 2015").

[23] *Id.* (stating "by May 6, 2015, the stock had risen approximately twelve-fold, a 1,200% increase").

[24] *Id.* (stating "tens of millions of shares traded hands on some days during the spike, meaning anyone who sold at the peak could have made tens of thousands of dollars in profits").

[25] *Id.* (stating "CrossClick's shares subsequently sunk back to being nearly worthless").

[26] *Id.* (stating PAC failed to initially disclose $242,000 loan to Finiks Capital LLC).

[27] *Id.* (stating PAC "has not filed required financial disclosure forms since July 2015").

[28] *Id.* (stating "the FEC fined Voters for Hillary $9,800 for one of its blown deadlines, but public filings reveal no action for other missed filings, omissions, and oddities").

[29] *Id.* (stating "the FEC caught the initially unreported loans and demanded an explanation, but the PAC never responded and FEC records show no follow up").

[30] *Id.* (identifying Kyleen Cane as "PAC lender while under federal indictment for a $300 million pump-and-dump scheme").

[31] Indictment, *United States v. Discala*, No. 14-cr-399 (E.D.N.Y. July 15, 2014), *available at* https://services.atsignhandle.xyz/ipfs/bafybeietmzqmpzyjeoitrj47rkrw357f5325wm2qrfzuc4m7acrge5spna (alleging defendants "concealed their ownership interests, released false press releases, and issued misleading SEC filings").

Table 3. Methodological Parallels: Discala Indictment vs. SuperPAC Scheme

Element	Discala Case (Indicted Conduct)	SuperPAC Scheme (2014–2015)
Target Security	Worthless penny stocks with no legitimate operations	CrossClick Media (XCLK): 170M shares trading at $0.0001
False Legitimacy	False press releases; misleading SEC filings	PAC association; press releases about "$10.7M pledge"; CrossClick SEC filings
Concealed Control	Defendants concealed ownership interests	PAC chairman's wife controlled CrossClick majority shareholder (MCKEA Holdings)
Coordinated Network	Multiple co-conspirators with fraud histories	PAC lenders included individuals with SEC enforcement histories
Retail Victimization	Elderly investors left with worthless shares	Retail investors bought at inflated prices; stock collapsed to near-worthless

This demonstrates that pending federal prosecution was insufficient to deter Cane from continuing nearly identical criminal conduct. The SuperPAC scheme establishes that the enterprise continued to operate through a pattern of racketeering activity that transcended any single prosecution.

I. The Cross-Click Media Entity Chain

CrossClick Media, Inc. (CIK 0001487659) was the vehicle through which the Super PAC scheme operated. The entity underwent multiple name changes: Southern Products, Inc. (2010–2013, ticker SNPD), Co-Signer, Inc. (2013–2014, ticker XCLK), and Cross Click Media Inc. (2014–2019). The company was based at 8275 S. Eastern Ave., Suite 200-661, Las Vegas, NV 89123, with SIC code 3651 (Household Audio & Video Equipment). The entity's status was subsequently REVOKED.

Cane Clark LLP's connection to CrossClick was both as SEC filing agent (CIK 0001255294) and as creditor. CrossClick's 10-K filing (Accession 0001262463-15-000678) disclosed **Promissory Notes with Cane Clark LLP** dated June 29, 2012 and November 30, 2012.[32] These promissory notes established Cane Clark as a creditor of the entity whose stock the Super PAC would later manipulate—creating a direct financial interest in the CrossClick price inflation scheme.

Cane's own seized text message from August 6, 2013 connects the XCLK entity directly to the Discala offshore manipulation infrastructure documented in Forensic Brief 10:

> "[M_____] is selling CACL and SNPD only out of OX and Northstar. He can buy or sell anything out of Trilogy."

[33] This text demonstrates that "SNPD"—the ticker under which CrossClick traded at the time—was being sold through the same offshore brokerage accounts (Oxbridge Technology Partners and North Star) used to manipulate Cubed and Crown Alliance Capital in the Discala scheme. The Super PAC fraud was not an isolated scheme; it was an extension of the same offshore manipulation infrastructure for which Cane was under federal indictment.

See Forensic Brief 10, Section VIII.D, Table 1B for the complete Cross Click Media corporate genealogy.

IV. CRIMINAL STATUTE ANALYSIS

A. Securities Fraud: 15 U.S.C. § 78j(b) and Rule 10b-5

The scheme violated Section 10(b) of the Securities Exchange Act and SEC Rule 10b-5 by employing manipulative and deceptive devices in connection with the purchase or sale of securities. The evidence establishes:

1. **Manipulative Device**: The use of a political action committee ostensibly supporting Hillary Clinton's presidential campaign to create the false appearance of legitimate business activity and institutional investment in a worthless penny stock.
2. **Material Misrepresentations**: CrossClick's press releases and SEC filings represented that the company had secured a $10.7 million contract with a legitimate political organization, when in fact the PAC was controlled by individuals with direct ownership interests in CrossClick (PAC chairman's wife controlled majority shareholder) and the financial transactions were circular and served no legitimate business purpose.
3. **Scienter**: The coordinated control structure (Milton Ault as PAC chairman while his wife Kristine Ault controlled CrossClick's majority shareholder) demonstrates knowing participation in the fraud. The participation of individuals with documented securities fraud histories as PAC lenders—including Cane (under federal indictment for $300M pump-and-dump) and Mary Coons (spouse barred by SEC)—further evidences scienter.
4. **In Connection With**: The false representations were made for the purpose of manipulating CrossClick's stock price and inducing retail investor purchases during the April-May 2015 pump phase.

B. Wire Fraud: 18 U.S.C. § 1343

The transmission of false and fraudulent press releases via interstate business wires constitutes wire fraud. CrossClick issued statements for months stating it had won a contract to run call centers and other services for Voters for Hillary, when the true purpose was stock price manipulation through circular financial transactions and the false appearance of business activity.

[32] Cross Click Media Inc., Form 10-K (June 30, 2015), CIK 0001487659, Accession No. 0001262463-15-000678 (disclosing Promissory Notes with Cane Clark LLP dated June 29, 2012 and November 30, 2012).
[33] Government's Reply Memorandum Re Evidence / Cane Wiretaps at 12–14, *United States v. Discala*, No. 14-CR-399 (S-1)(ENV) (E.D.N.Y. Jan. 5, 2018).

C. Federal Election Campaign Act Violations: 52 U.S.C. § 30109

The PAC violated federal campaign finance law by:

1. **Failure to Disclose**: Initially failing to report the $242,000 loan to Finiks Capital LLC, a major CrossClick shareholder, concealing the direct financial flows between the PAC and entities profiting from the stock manipulation.
2. **Fraudulent Purposes**: Operating a PAC that spent zero dollars on political candidates or issues, instead functioning solely as a promotional vehicle for securities fraud.
3. **Cessation of Required Filings**: Abandoning all required FEC disclosure obligations in July 2015 immediately after the stock collapsed, demonstrating the PAC had no legitimate political purpose.

D. RICO: 18 U.S.C. § 1962(c)

The SuperPAC scheme constitutes racketeering activity as part of the broader Cane-Wallace enterprise pattern. The execution of this scheme while Cane was on federal pre-trial release for a nearly identical $300 million pump-and-dump conspiracy demonstrates:

1. **Pattern of Racketeering Activity**: Multiple related securities fraud schemes executed using similar methodologies (false legitimacy through organizational structures, coordinated control, retail investor victimization).
2. **Continuity**: The enterprise's operations transcended any single prosecution, continuing to function during pending federal charges.
3. **Enterprise Conduct**: The scheme required coordinated participation of multiple actors (PAC leadership, CrossClick management, lenders with fraud histories) connected through the Cane-Wallace network.

Table 4. Statutory Violations Summary

Statute	Core Elements	Evidence
15 U.S.C. § 78j(b)	Manipulative and deceptive devices in connection with securities transactions	Use of PAC to create false appearance of institutional investment; coordinated control (Milton/Kristine Ault); $73,000 round-trip transactions
18 U.S.C. § 1343	Wire fraud via interstate electronic communications	Transmission of fraudulent press releases via business wires claiming $10.7M contract
52 U.S.C. § 30109	Federal election campaign finance law violations	PAC spent $0 on candidates; failed to disclose $242K Finiks loan; ceased all filings July 2015
18 U.S.C. § 1962(c)	Conducting an enterprise through a pattern of racketeering	Execution while on bond for $300M securities fraud; parallel methodology to Discala case

---

V. ENTERPRISE SIGNIFICANCE

This scheme demonstrates several critical characteristics of the Cane-Wallace enterprise:

1. **Operational Continuity During Prosecution**: The enterprise continued to execute securities fraud schemes even while its principals faced federal charges for nearly identical conduct, demonstrating that criminal prosecution alone was insufficient to disrupt operations.
2. **Exploitation of Legitimate Institutions**: The use of a political action committee associated with a major presidential campaign demonstrates the enterprise's sophisticated understanding of how to cloak fraudulent conduct in apparently legitimate organizational structures.
3. **Network Effects**: The scheme required coordination among multiple actors with securities fraud histories, recruited through the enterprise's established network (Cane as lender, individuals with SEC enforcement actions, entities controlled by PAC leadership's family members).
4. **Methodological Consistency**: The SuperPAC scheme employed the same core methodology as the Discala pump-and-dump for which Cane was under indictment: worthless penny stocks, false appearances of legitimacy, coordinated control structures, and retail investor victimization.

The scheme resulted in retail investor losses while insiders who sold at peak prices realized substantial gains. The stock's collapse from its May 6, 2015 peak to near-worthlessness, combined with the PAC's immediate abandonment of regulatory filings, demonstrates this was a carefully planned extraction scheme with no sustainable business purpose.

VI. SOURCES & CITATIONS