BRUSHWORKS · DILIGENCE PACK · SEPTEMBER 2026

Diligence pack.

Contents, thirty questions, and how to request it

What prospective clients, treasurers, donors' counsel and ministries receive under non-disclosure agreement; what a reviewer should check in each document; thirty questions with the document that answers each; and the request process.

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Section 1

Purpose

The diligence pack is what a prospective client, a committee treasurer, a donor's counsel, an inspector general or a ministry's compliance office receives when it needs to satisfy itself — before money moves — that the firm's claims about its wall, its measurement, its data and its disclosures are true. Everything in it is a document the firm already keeps in the ordinary course; nothing is produced for the occasion. It is delivered under the firm's mutual non-disclosure agreement within five business days of request.

1.1 Who receives it, and on what terms

REQUESTER	TYPICAL PURPOSE	TERMS
Prospective client (campaign, committee, institution)	Vendor selection; board or counsel approval	Mutual NDA; the redacted proof report may not be shared beyond the requester's counsel and principals
Donor's counsel; committee treasurer	Certifying that an independent-expenditure program is walled and compliant	Mutual NDA; the wall certification may be shown to the FEC or a state regulator on request
Government or institution	Procurement; security and residency review	Mutual NDA; the security assessment summary and residency attestation template are included
Auditor, inspector general or regulator	Review under legal authority	Provided under the requester's own authority; the firm notifies affected clients where lawful

Section 2

Contents

DOCUMENT	WHAT IT IS	WHAT A REVIEWER SHOULD CHECK
1. Wall certification	Counsel's certification, for the current cycle, that the candidate and independent-expenditure practices operate as separate teams, systems and delivery seats with no person crossing during the cycle; the firewall policy under 11 C.F.R. §109.21(h)	The date; the named counsel; the list of controls; the statement that no exception exists; the firewall policy's text
2. Sample proof report (redacted)	A complete program report: design (holdout sizes, seeds, balance table), lift by cohort and register with intervals, decay, backfire with suppression dates, the program's kill log, the media trail from invoice to impression, limits and basis	That lift is reported against a holdout, never as raw outcomes; that negative lift appears; that the media trail reconciles; that the limits section is not empty
3. Sample kill log and model card	A program-level kill log with baselines, results and reasons; the card of a shipped model and of a retired model	That the gate's margins are stated; that the proxy test is reported with its threshold; that field kills record the drift measure and date
4. Methodology notes	Version in force	That the proof report conforms to it

DOCUMENT	WHAT IT IS	WHAT A REVIEWER SHOULD CHECK
5. Processor list	Every processor by category — hosting, delivery platforms, licensors, mail house, relational tools — with the terms that bind it and its location	That no processor receives record-level program data except the hosting provider; that locations satisfy any residency requirement
6. Sample provenance record	What is recorded about a data source before use: source, license, permitted purpose, broker registration, refresh, retention, excluded categories	That the excluded categories are named; that broker registration is checked
7. Independent-review summaries	The security assessment summary; the wall assessment; the methodology reviewer's letter	Dates; scope; findings and remediation status
8. Carrier's certificate	The third-party underwriting behind the performance assurance for qualifying political programs placed through the firm's seats	That the assurance is described only in the engagement letter and never as a guarantee of an outcome
9. Compliance review template	The day-ten checklist, unfilled: acceptance screen, registrations, wall, provenance, legal basis and consent, models, disclaimers and imprints, synthetic media, calls and texts, transfers and residency, retention, sign-off	That it is signed by the compliance lead and counsel of record before air
10. Security summary and residency attestation template	The public summary and the per-mandate attestation	Recovery objectives; notification timelines; in-country holding where required
11. Policies and disclosures	Privacy, data use, governance, disclosures, terms — the versions in force	Effective dates; the declination policy; the verification ledger
12. Registration extracts	Copies of any FARA, LDA, FIRS, FITS or third-party filings relevant to the requester's mandate	That filing dates precede activity dates

Section 3

Thirty questions, and where the answers are

QUESTION	ANSWER IN
Is there a sealed control in every program, drawn before spend?	Methodology notes §3; proof report design section
How large is it, and what can it see?	Methodology notes §7; terrain brief
Who holds the assignment list?	Methodology notes §3.4 — the client, directly
Are effects reported as intention-to-treat with intervals?	Methodology notes §6; proof report
Does the report show cohorts that moved the wrong way?	Methodology notes §10.2; sample proof report
What baselines must a model beat, and by how much?	Methodology notes §8; model cards

QUESTION	ANSWER IN
How is proxy reconstruction of excluded attributes tested?	Methodology notes §8.3; kill log
How many models were tested and how many shipped?	Kill-log summary
What data categories are excluded by policy?	Data use policy §1; provenance record
Where does each data source come from and under what license?	Provenance record; processor list
Are data brokers checked for registration?	Provenance record; compliance packs
Is there data on minors?	Data use policy — none; provenance record
How are the candidate and IE practices separated?	Wall certification; governance policy §2
Who signs the compliance review, and when?	Compliance review template; governance policy §3
Which registrations apply and were they filed before activity?	Registration extracts; transparency report
How are disclaimers and imprints applied?	Compliance review; disclosures policy
Are placements visible in platform ad libraries?	Media trail in the proof report; ad libraries
Is any messenger undisclosed?	Disclosures policy — never; the five rules
Is synthetic media used?	Data use policy §11 — no real-person depictions; labeling where required
What consent is held for texts and calls?	Compliance review; consent logs (program-specific)
Where is data held, and can it be held in-country?	Security summary §3.9; residency attestation
What is the incident notification timeline?	Security summary §4 — seventy-two hours
Who can access program data?	Security summary §3.1; access list per program
When is data destroyed?	Security summary §3.7 — ninety days after close, certified
Has the firm been independently assessed?	Independent-review summaries
What does the performance assurance cover?	Carrier's certificate; engagement letter
How are conflicts and opposing-side work handled?	Governance policy §5–6; declination policy
How can staff or others raise concerns?	Governance policy §10; transparency report §4
What has the firm declined, and why?	Transparency report (aggregate)
What are the losses, and what was learned?	Casebook; annual report

Section 4

How to request

1. Write through the contact page (choose the practice) or to counsel, naming the requester, the purpose and the documents needed first.
2. The firm sends its mutual NDA; counsel's redlines are welcome, and the firm's standard positions on marking, residuals and venue are reasonable.
3. Within five business days of signature, the pack is delivered through a secure data room with access limited to named reviewers, with the redacted proof report watermarked.
4. A call with the compliance lead and, where useful, the head of research is offered to walk through the documents.

Diligence pack — contents and request, September 2026. Contents are reviewed with each site release; document versions are stated in the pack itself.