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By Office of General Counsel at 12:29 pm, Jul 22, 2015



July 22, 2015

Federal Election Commission
Office of General Counsel
999 E Street
NW Washington, DC 20463

To Whom It May Concern,

I am writing this letter in response to three suggestions Democracy Rules received during the Commission's meeting of July 16, 2015.

The first suggestion relates to Democracy Rules' practice of nullifying the results of a presentation cycle which is in conflict with a previous cycle. Our policy has now been changed to prohibit any presentation cycle nullification under any circumstances. The funds collected for each cycle will be directly forwarded to the recipient regardless of any conflict.

The second suggestion relates to Democracy Rules' federal reporting requirements. Democracy Rules forwards contributions to the campaign committees of legislators within 10 days of reception. These funds are accompanied with an Excel file containing all relevant donor information. Our registration page contains a certification function which requires users to affirm their eligibility before registration is accepted. And Democracy Rules' treasury bank account is separate from our member's bank account.

The third and final suggestion relates to DR's ability to ensure user donations are sent to only the recipients they have expressly chosen. Even though potential recipients are clearly displayed in our polling and pledging sections, Democracy Rules has created a new function which allows users to withdraw their donations during and after the conclusion of each presentation cycle if they do not wish to contribute to the winner of the trustee election. From the minute a user pledges funds in a presentation cycle, until 24 hours after that cycle is completed, a user only needs to click a button on their My Account page to cancel their donation and have their funds credited back into their personal DR account.

Democracy Rules is amiable to making other policy or website changes which the Commission feels is necessary or appropriate. Thank you very much for your consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Cashman". The signature is written in a cursive, flowing style.

Ray Cashman
Executive Director, Democracy Rules Inc.