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Lisa J. Stevenson
Acting General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

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OFFICE OF
GENERAL COUNSEL

Re: Advisory Opinion Request—Government Accountability Institute

Dear Ms. Stevenson,

I write on behalf of the Government Accountability Institute (“GAI”) to respectfully request an advisory opinion from the Federal Election Commission (the “Commission”) pursuant to the Federal Election Campaign Act (the “Act”). *See* 52 U.S.C. §30108; 11 C.F.R. §112.1. GAI seeks affirmation that its publication of books, articles, editorials, investigations, and a website containing news and commentary qualifies for the press exemption, also known as the media exemption, at 52 U.S.C. §30101 (9) (B) (I), 30104 (f) (3) (B) (i).

I. FACTUAL BACKGROUND

GAI is a nonprofit corporation established pursuant to Section 501 (c) (3) of the Internal Revenue Code (“Code”). It was incorporated in Delaware on February 17, 2012, and it sought approval in customary language to engage in, “such charitable, educational, and scientific activities as may qualify for exemption from federal income tax under Section 501 (c) (3) of the Internal Revenue Code.” A copy of the Certificate of Incorporation is annexed as Exhibit 1.

GAI’s primary function has been to investigate, document and report on cronyism and corruption in the government. As stated in GAI’s Form 990 for 2017, Return of Organization Exempt from Income Tax, regarding its purpose, “The Government Accountability Institute (GAI) produces detailed investigations of cronyism and government corruption to educate citizens on the need to protect free markets. GAI produces reports and partners with national media to advance free market principals. GAI’s work has been featured on CNN, NPR News, NY Times, National Review, 60 minutes, ABC news, NY Post, Fox News, Politico, Washington

Times, Forbes and Numerous others.” A copy of the filed Form 990, without schedules, is annexed as Exhibit 2.

GAI has been recognized by the Federal Government a number of times as a press entity in written responses to requests for information pursuant to the Freedom of Information Act. For example, on December 11, 2018, Sara Moss of the Treasury Department wrote to Caleb Stephens of GAI, “For fee purposes, we have determined that you are a “media” requester.”¹ Similarly, the Department of Energy made the same finding on December 31, 2018, as did the U.S. Immigration and Customs Enforcement Agency on April 10, 2019. The three recent written communications from the Federal Agencies are Annexed hereto collectively as Exhibit 3.

GAI is not owned or controlled by any political party, political committee, or candidate. Indeed, as an IRS approved 501 (c) (3) entity it is not permitted to, and does not engage any political activity. It has not and will not endorse any candidate, donate funds to any candidate or

¹ See, 5 U.S.C. §522 (a) (4) (A) (III) In this clause, the term “a representative of the news media” means any person or entity that gathers information of potential interest to a segment of the public, uses its editorial skills to turn the raw materials into a distinct work, and distributes that work to an audience. In this clause, the term “news” means information that is about current events or that would be of current interest to the public. Examples of news-media entities are television or radio stations broadcasting to the public at large and publishers of periodicals (but only if such entities qualify as disseminators of “news”) who make their products available for purchase by or subscription by or free distribution to the general public. These examples are not all-inclusive. Moreover, as methods of news delivery evolve (for example, the adoption of the electronic dissemination of newspapers through telecommunications services), such alternative media shall be considered to be news-media entities. A freelance journalist shall be regarded as working for a news-media entity if the journalist can demonstrate a solid basis for expecting publication through that entity, whether or not the journalist is actually employed by the entity. A publication contract would present a solid basis for such an expectation; the Government may also consider the past publication record of the requester in making such a determination. Also, see 31 CFR §1.7 (B) (6) *Representative of the news media* is any person or entity that actively gathers information of potential interest to a segment of the public, uses its editorial skills to turn the raw materials into a distinct work, and distributes that work to an audience. The term “news” means information that is about current events or that would be of current interest to the public. Examples of news media entities include television or radio stations broadcasting news to the public at large and publishers of periodicals that disseminate “news” and make their products available through a variety of means to the general public. A request for records that supports the news-dissemination function of the requester shall not be considered to be for a commercial use. “Freelance” journalists who demonstrate a solid basis for expecting publication through a news media entity shall be considered as a representative of the news media. A publishing contract would provide the clearest evidence that publication is expected; however, components shall also consider a requester's past publication record in making this determination.

committee, or oppose the election of any candidate. GAI does not work for or against any political candidate, political committee or political party.

GAI has published five books, all related to cronyism, fraud and corruption in the government. Each featured a GAI employee as the primary author, with or GAI, as an entity and its staff credited with the research, and writing necessary to publish the books. In each instance the primary author and GAI share in the proceeds from the sale of the books. In 2018, *Compromised, How money and Politics drive FBI Corruption*, by Seamus Bruner and GAI, *Clinton Cash, The untold story of how and why foreign governments, and businesses helped make Bill and Hillary Rich*, by Peter Schweizer and GAI; In 2015; *Extortion, how politicians extract your money, buy votes, and line their own pockets*, by Peter Schweizer and GAI; in 2013, *Fraud, How the left plans to steal the next election*, by Eric Eggers and GAI; and 2018, *Secret Empires, How the American political class hides corruption and enriches family and friends*, by Peter Schweizer and GAI, published in 2018.

GAI actively maintains a website <http://www.g-a-i.org/> that promotes its mission to investigate and expose crony capitalism, misuse of taxpayer monies, and other governmental corruption or malfeasance. The website also invites visitors to report corruption to it so that GAI researchers may follow up and report to the public when such is appropriate. On the website GAI has published hundreds of articles, reports, interviews, editorials, and comments for all to read and follow free of charge. This broad-based publication of news related to corruption and government waste informs and educates the public. Earlier this year GAI added a new feature to the website called the "Drill Down," which provides video news pieces generally featuring Peter Schweizer, but also occasionally featuring other GAI staff reporting in depth on current issues prevalent in the news.

GAI augments its website, books, and appearances on television and radio with an active presence on social media to further publish news and commentary on issues of importance to an informed citizenry. For example, Peter Schweizer regularly reports on Twitter at, Peter Schweizer@Schweizer.GAI. Similarly, Mr. Schweizer and his colleagues at GAI maintain a presence on Facebook, see <https://www.facebook.com/GovernmentAccountabilityInstitute>; and on You Tube <https://www.youtube.com/channel/UC>. Through all these outlets GAI regularly

provides news and insights into newsworthy events through commentary and the publication of investigative findings.

Frequently, GAI, primarily through Peter Schweizer, or another staffer, publishes a column, Op-Ed, video, or report in the media and/or directly on the GAI website. Examples include an article published by Mr. Schweizer: *"Your money is being used to help bankroll the World Economic Forum I Davos. Why"*, published by Fox News on January 11, 2017; on December 13, 2016, the Washington Post published, *"The swamp is deep, and here are five bipartisan ways to drain it"*. Another example is an opinion printed in USA Today, on November 27, 2012, titled, *"Campaign-finance tweaks can fix big problems."* All three published pieces are annexed collectively as Exhibit 4, and are a subset of such material published over the years. Each has Peter Schweizer as the author and each is the product of GAI's research. Similarly, Mr. Schweizer and other staff have frequently appeared on television or on the radio as a commentator/reporter regarding matters GAI has investigated or is in the process of investigating. Simply put, Mr. Schweizer is the "face" of GAI's media presence. A complete list of all such media appearances, as well as uses of GAI material on the media is annexed hereto as Exhibit 5.

II. LEGAL ANALYSIS

GAI qualifies for the media or press exception to the Federal Election Campaign Act's ("FECA") disclosure, disclaimer, and reporting requirements because GAI regularly produces and disseminates news, investigative reports, and books that provide vital news, information and political commentary regarding the operation of the United States government and the services provided by elected and appointed officials to the public. Most is done free of charge, however it does charge for the books it has published, as is standard in the industry. Moreover, GAI is not owned or controlled by a political party, political committee, or candidate. *See* §§ 52 U.S.C. 30101 (9) (B) (i), 30104 (f) (3) (B) (i). Indeed, as an IRS 501 c-3 entity, it does not endorse or oppose candidates or engage in any electioneering or political advertising or advocacy.

A. Government Accountability Institute's Book Publications, Investigative Reporting, Website and Social Media Reports Separately & Collectively Qualify for FECA's Media Exception.

FECA specifically acknowledges that there is a media exception, starting in 52 U.S.C. § 30101. Definitions at (9) (B) “The term “expenditure” does not include—(i) any news story, commentary, or editorial distributed through the facilities of any broadcasting station, newspaper, magazine, or other periodical publication, unless such facilities are owned or controlled by any political party, political committee, or candidate”. This concept is further acknowledged in 52 U.S.C. §30101 (f) (3) (B) (i), “Exceptions. The term ‘electioneering communication’ does not include a communication appearing in a news story, commentary, or editorial distributed through the facilities of any broadcasting station, unless such facilities are owned or controlled by any political party, political committee, or candidate.” GAI regularly produces investigative reports on broadcast news shows, podcasts, websites, written reports, though social media, and published books, and GAI is neither owned or controlled by any political party, candidate, or political committee.

The Supreme Court in *Citizens United v. FEC*, 510 U.S. 310 (2010) (353) recognized, “There is simply no support for the view that the First Amendment, as originally understood, would permit the suppression of political speech by media corporations. The Framers may not have anticipated modern business and media corporations. Thus, the lines between traditional media and other commentators has been blurred and therefore the heightened protections for political speech cannot be limited to traditional media companies.” (citations omitted) Further, at 356, “When Government seeks to use its full power, including the criminal law, to command where a person may get his or her information or what distrusted source he or she may not hear, it uses censorship to control thought. This is unlawful. The First Amendment confirms the freedom to think for ourselves.”

1. Website

The Supreme Court was prescient in noting in *Citizens United* at 364 “Soon, however, it may be that Internet sources, such as blogs and social networking Web sites, will provide citizens with significant information about political candidates and issues.” GAI, maintains a website, <http://www.g-a-i.org/>, which since 2012 has regularly published articles, investigations, editorials and interviews which in and of itself should qualify GAI as a media entity. It’s over 250 publications have often been picked up and published in other media, including the

Washington Post, Politico, Mother Jones, Breitbart, the New York Times, The Wall Street Journal, CNN, ABC, Fox News, etc. See Exhibit 5, a chart detailing the news published on the website and citing other publications that carried the news report, interview, Facebook article, investigative report, or editorial. In addition, GAI maintains an active presence through Twitter, Instagram and YouTube where it also publishes newsworthy material in furtherance of its mission to investigate and inform the public.

FECA's media exception for expenditures noted above is expressly included in 11 CFR §100.32, "Any cost incurred in covering or carrying a news story, commentary, or editorial by any broadcasting station (including a cable television operator, programmer or producer), Web site, newspaper, magazine, or other periodical publication, including any Internet or electronic publication, is not an expenditure unless the facility is owned or controlled by any political party, political committee, or candidate...." As noted, GAI is an IRS recognized nonprofit organization which is not owned or controlled by any political party, political committee or candidate. (*see Exhibit 1*), the GAI certificate of incorporation, and Exhibit 2, GAI's tax return for 2017. GAI investigates and reports on cronyism, government corruption, and the need to protect free markets. All newsworthy topics of importance, indistinguishable from reporting on similar topics by other recognized media/press entities, and often disseminated through such other press entities. Mr. Schweizer frequently is featured in mainstream publications and broadcasts discussing the investigative work of GAI, *see for Example Exhibit 4 and 5*.

In Advisory Opinions 2005-19; 2005-16; and 2007-20, to name a few, the Commission has applied a two-step analysis to determine if the press exception applies. First, it asks whether the entity is engaging in the activity is a press entity as described by the Act and Commission regulations, and then if it is owned or controlled by a political party, political committee or candidate. The Commission wrote in Advisory Opinion 2005-16, that Fired Up could maintain a website that contains some original news reporting, which is occasionally picked up by other media, and otherwise allows others to post articles on it as a press entity. Specifically, it stated, "in light of the facts presented, Fired Up's disbursements for news stories, commentary, and editorials on its websites are encompassed by the press exception, and therefore do not constitute "expenditures" or "contributions" under the Act and Commission regulations." (at 4) In Advisory Opinion 2005-19, the Commission allowed radio broadcasts of interviews with federal

candidates, finding that, "Paradigm Shift Productions is in the business of producing on a regular basis a radio program that disseminates news stories, commentary and/or editorials. It also buys airtime to broadcast the program and resells some of the that airtime for third party advertisements. Therefore, the Commission concludes that Paradigm Shift Productions is a press entity." (at 4)

The Commission clarified in Advisory Opinion 2016-01, that the media exception is not limited to traditional media companies. Congress enacted the media exemption to ensure that the Act would not "limit or burden in any way the first amendment freedoms of the press" and would protect "the unfettered right of newspapers, TV networks, *and other media* to cover and comment on political campaigns." H.R. Rep. No. 93-1239, 93d Cong., 2d Sess. At 4 (1974) (emphasis added). Thus, although the statutory media exemption applies to "any broadcasting station, newspaper, magazine, or other periodical publication," 52 U.S.C. § 30101 (9) (BN) (i), the Commission's regulations provide that the exemption also applies to qualified internet activities. 11 C.F.R. §§ 100.73, 100.132. Upon amending the regulations to reflect this more current understanding of media entities, the Commission noted that "the media exemption applies to media entities that cover or carry news, stories, commentary, and editorials on the Internet, just as it applies to media entities that cover or carry news stories, commentary, and editorials in traditional media." Internet Communications, 71 Fed. Reg. 18589, 18608 (Apr. 12, 2006). Accordingly, as used in the Commission's media exemption regulations, "[t]he terms 'website' and 'any Internet or electronic publication' are meant to encompass a wide range of existing and developing technology, such as websites, 'podcasts,' etc." Internet Communications, 71 Fed. Reg. at 18608 n.52. Further, *see* Advisory Opinion 2000-13 (INEXTV) (concluding that company providing news and information online with limited original content qualified as media entity despite lacking traditional offline media presence).

GAI, has regularly published for seven years investigative reports, news, commentary, interviews and editorials on its website, and through its various social media outlets, including a series of podcasts which commenced this year. GAI's work product, and personnel regularly appear on other news outlets, including the 'main stream media', and its reports have been republished throughout multiple news outlets. (*see Ex. 5*) It isn't owned, or controlled by any

political party, political committee, or candidate, and therefore falls clearly within the above cited Advisory Opinions, and regulatory framework of a media/press entity.

GAI clearly is properly classified as a press entity based on its activity, existing Commission guidance and case law. In *Readers Digest Ass'n v. FEC*, 509 F. Supp. 1210 (215) (S.D.N.Y. 1981), the Court framed the key question as whether the speech at issue was part of the speaker's legitimate press function or for an unrelated purpose. GAI's investigative reporting is its reason for existing, and its website, books, etc, clearly represents speech that is essential to its press function.

This is further supported by the findings in *FEC v. Mass. Citizens for Life* 499 U.S. 238, (250-251) (1986) which analyzed if the media exception applied to a special edition flyer which was different in content and distribution from the entities regular and ongoing newsletter publication. The Court determined the special edition was different from the normal and usual publications of the subject organization and therefore wasn't entitled the press exemption that the regularly published newsletter could enjoy.

GAI functions as a press entity by researching topics, gathering facts, analyzing same and regularly disseminating its findings through its website, books, social media, and through more traditional media outlets, including broadcast media and traditional newspapers. As noted in Exhibit 5, Mr. Schweizer and others regularly appear in person, or through writings in traditional media to further expose GAI's investigative findings.

2. FOIA

GAI has also been recognized by the United States Government as a press entity in several instances when it made application for government information pursuant to the Freedom of Information Act. On December 11, 2018, the United States Department of the Treasury, wrote to Caleb Stephens of GAI with regard to FOIA No. 2018-11-109, "For Fee purposes, we have determined that you are a "media" requester.... As a media requester, you will be charged the cost of duplication only, excluding charges for the first 100 pages." (*Exhibit 3*) In a December 31, 2018 letter from the Department of Energy to GAI, annexed as *Exhibit 3*, it stated, "For the purposes assessment of any fees, you have been categorized under the DOE regulation

that implements the FOIA at Title 10, Code of Federal Regulations (CFR), § 1004.9 (b) (3), as a “news media” requestor.”² And in 2019, the U.S. Immigration and Customs Enforcement Agency made a similar finding that GAI is a media requester when it sought records from that agency. *See Exhibit 3.*

In each instance an agency of the Federal government determined FOIA requests filed by GAI are properly treated as requests from the news media and therefore entitled to waived or lower fees for copies of government documents. These independent determinations support the notion that GAI is a press or media entity as contemplated by the Commission.

3. Books

As previously noted GAI has participated in the publication of five books to date representing its research work product. Both Congress and the Supreme Court have indicated that First Amendment press protections should be broadly construed. The Court so noted in *Citizens United* at 349 that it would be troubling if the corporate expenditure ban could be applied to books; while Congress in 1974 noted it did not seek to “limit or burden in any way the First Amendment freedoms of the press and association”, *see* H.R. Rep. NO 93-1239 at 4. Further in Advisory Opinion 2008-14 (Melothe Inc.) at 3, “Commission has not limited the press exemption to traditional news outlets, but rather has applied it to news stories, commentaries, and editorials, no matter in what medium they are published.” GAI has published news, commentaries and editorials in multiple media, including through published books. The President of GAI, and its most prolific author is Peter Schweizer, who the Commission has recognized, “is a journalist and author who has written books and articles on government, public policy and other topics”. (*see, MUR 6938 at 1,2*) His most recent book, entitled: *Secret Empires*

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- ² (3) *Requesters who are representatives of the news media.* The DOE will provide documents to requesters in this category for the cost of reproduction only, excluding charges for the first 100 pages. To be eligible for inclusion in this category, a requester must meet the criteria in § 1004.2(m), and his or her request must not be made for a commercial use. With respect to this class of requesters, a request for records supporting the news dissemination function of the requester will not be considered to be a request for a commercial use. *See further, 5 U.S.C. §552 4 (A) (ii) supra.*

How the American Political class hides corruption and enriches family and friends was released by HarperCollins in 2018.”

The GAI has a policy related to book publications that recognizes the ultimate publication is the work product of the team of researchers working for GAI, while also requiring extraordinary effort and additional work from the primary author. As such its policy is to allow the author to negotiate and receive whatever advance is possible from the publisher, with all other royalties and proceeds being divided between the author and GAI to further its investigative and journalistic publishing efforts. This practice was followed for *Clinton Cash* in which Mr. Schweizer recognized the significant work of the ‘researchers’ and the leadership of GAI. The book was a best seller, and various segments were published on GAI’s website, were the subject of other journalistic endeavors, and were often quoted. In fact, the New York Times was given an advance copy of the manuscript, conducted independent research and published a front page 4,000-word story validating the findings in the book relative to Russian uranium deals. See <https://www.nytimes.com/2015/04/24/opinion/candidate-clinton-and-the-foundation.html>. In addition, various other news outlets including the Washington Post either published segments of the book or invited Mr. Schweizer as a speaker or guest, thereby vastly increasing the public’s recognition of the investigative work being published by Mr. Schweizer, and, more broadly, GAI. Further, the book was made into a movie which was broadcast and otherwise disseminated to the public as a documentary.

In 2013, Mr. Schweizer published, *Extortion, How Politicians Extract Your Money, Buy Votes, and Line Their Own Pockets*. Once again Mr. Schweizer obtained an advance he negotiated, and all other royalties were shared equally with GAI. In the acknowledgment, Mr. Schweizer recognized the Board of GAI, for making the book possible; as well as listing numerous GAI staff researchers and employees who helped to create the publication. See *Exhibit 6, Acknowledgments*.

In 2018, Mr. Schweizer and GAI published, through Harper Collins, *Secret Empires, How the American Political Class Hides Corruption and Enriches Family and Friends*. Once again Mr. Schweizer and GAI will divide the royalty payments from the book. In the acknowledgements, after thanking the board and various staff at GAI, Mr. Schweizer wrote, “At

GAI we have a formidable band of professional staff who make us one of the most effective investigative organizations in the world. These include Stuart Christmas our general counsel, research director Eric Eggers, program director Steve Post, and data and technical director Chance Hendrix. Sandy Schulz helps us expertly navigate the world of media and communications. They all contribute mightily to this book. Some GAI employees who also contributed have asked to remain anonymous.”

In 2018, Regency Publishing published, *Fraud, How the Left Plans to Steal the Next Election*, by Eric Eggers of the GAI. Mr. Eggers following GAI policy divides all royalties with GAI. In the forward by Peter Schweizer, he wrote, “Our organization, the Government Accountability Institute (GAI), was born in 2012 to do this kind of work, and ask these sorts of questions. We are a nonprofit group of investigative reporters, researchers, and writers who do our own research and publish our findings in reports, or as raw material shared with media organizations to pursue further, and as books like this one. While many of the books we’ve written on government corruption and incompetence bear my name as the author, they all relied on our marvelous team at GAI” (*see Exhibit 8*). Further, Mr. Eggers wrote in the acknowledgements, “There may be some people who are able to conceive, research, draft and edit a book by themselves. I am not one of those people. This book exists only because of the efforts of an entire team with whom I was fortunate enough to work. At the Government Accountability Institute, we are blessed with some of the brightest and hardest working researchers and staff in the country. Thanks to all of you for your help and support.” (*see, Exhibit 8*)

Seamus Bruner is the Associate Director of Research at the Government Accountability Institute. Seamus has worked with GAI since 2013 providing research and support for numerous New York Times bestsellers and 60 Minutes exposes. In 2018 Seamus/ GAI published, *Compromised: How Money and Politics Drive FBI Corruption*. Following GAI policy Seamus shares royalties’ payments with GAI, to support its ongoing research and publication of important information about corruption in government and politics. (*see Exhibit 9*) Furthermore, Mr. Bruner acknowledged that he was a researcher on many other GAI publications and news stories.

All the books are classic examples of media or press activity. They are the product of GAI staff and leadership's dogged research, which has given the American people insight into how government and politics, works, or doesn't work for the benefit of the average citizen. There can be no doubt the publications meet the standards of media activity as defined by the FECA, and as described in multiple Advisory Opinions of the Commission, and as commonly understood by the public. Each is a product of the regular and continuing journalistic endeavors of GAI.

4. Social Media

As noted above, GAI maintains an active presence on social media where it distributes its news reports, investigations and commentary. In a fairly recent innovation, GAI has started presenting stories in greater depth, primarily through Peter Schweizer, or another GAI news person making a presentation on the web. The Drilldown is a video podcast series that can now be found directly on the GAI website, along with its many other news features, or can be accessed through Instagram, at <https://instagram.com/drilldowntv/>, or on Twitter, at, <https://twitter.com/TheDrillDown1>. The DrillDown is an accessible way to reach the public and other working journalists with GAI's outstanding research and investigations. Channel subscribers have first "dibs" on the videos and other reporters will find source material they can use in their own stories. DrillDownTV's first episode was released in March. The premiere video podcast was the fifth most popular story on Facebook on the day it was released, and was followed by various industries. Other episodes have examined Washington's famous "revolving door" linking politicians and lucrative lobbying businesses, many of which were drawn from the book, *Secret Empires*. One investigation showed there are 430 former lawmakers, almost an entire "shadow Congress," currently prowling K Street, lobbying their former colleagues in Washington on behalf of countless special interests. DrilldownTV podcasts have been featured on the respected political news site *RealClear Investigations* and in FOX News segments. They have been picked up by large media organizations hungry for facts on those currently setting the national agenda.

Social media is an increasingly important vehicle for publishing news and commentary, and GAI is taking full advantage of these avenues to regularly publish its breaking news and in-

depth reporting of issues important to the electorate and beyond. Additional social media access to GAI's reporting news to the public, free of charge may be found at: Facebook GAI: <https://www.facebook.com/GovernmentAccountabilityInstitute/>; YouTube GAI: https://www.youtube.com/channel/UC_xyXi1a0-hTLoZUoYr4YMg-hTLoZUoYr4YMg; Drill Down Facebook: <https://www.facebook.com/drilldowntv/>

5. Conclusion

A review of the news tab at the GAI website reveals that on June 6th, alone, GAI reporting was directly cited, or the basis of stories published by the Wall Street Journal, Issue One, Fox News, Fox Business, ABC (two different outlets), and the New York Times. By further publishing the product of its investigative work GAI is able to reach an audience several times the size of its own website and social media following. GAI is known as a trusted source of news frequently cited by the main street media and beyond. This is the essence of what the media exemption was created to accomplish. To allow journalists to research and write about matters of public concern and share that information with the public, without being shut down by the Commission, or another government instrumentality because the reporting covers politics and politicians. Any such content based censorship will not, has not, and cannot withstand court scrutiny.

FECA's media exception recognizes that, "a communication appearing in a news story, commentary, or editorial distributed through the facilities of any broadcasting station, unless such facilities are owned or controlled by any political party, political committee, or candidate" see 52 U.S.C. 830104(f)(3)(B)(i). Further, as noted above by both statute and 11 C.F.R. §100.132, news stories, commentary, or editorial by any broadcasting station, Web site, newspaper, magazine, or other periodical publication, including the internet or electronic publication is not an expenditure within FECA, unless the publication is owned or controlled by a political party, political committee or candidate. Since it is clear that GAI is not so owned or controlled, its publications are well within the envelope of media entities entitled to the media exception. Indeed, but for the fact that GAI focuses on corruption and misfeasance by government officials and political candidates it would not matter how the Commission viewed

GAI, the reporting would not be susceptible to being considered an electioneering communication.

In Peter Schweizer's 2018 *Secret Empires* he referred to investigative findings questioning the integrity and truthfulness of Joe Biden and Mitch McConnell, who are both candidates for office in 2020, along with critical comments about President Trump and his family, as well as naming many other political figures. If the Commission found that Mr. Schweizer and his book was a form of political advertising, rather than political commentary protected by the First Amendment and the media exception, he and the publisher could face a Commission investigation and enforcement action for making illegal contributions through the publication. As noted in *Citizens United*, at 324 "The First Amendment does not permit laws that force speakers to retain a campaign finance attorney, conduct demographic marketing research, or seek declaratory rulings before discussing the most salient political issues of our day." Yet, here is GAI, seeking an Advisory Opinion to protect its right to investigate and report to the public on issues of importance without having to defend its actions because some of its reporting relates to political candidates, be they currently elected officials or simply aspirants. We note in MUR # 6938. Mr. Schweizer had to retain counsel to defend his publication of *Clinton Cash* and his speaking out about the findings of GAI's research regarding the Clinton Foundation and its leadership; the Commission recognized Mr. Schweizer as a journalist, without commenting on GAI because it wasn't a named party.

Advisory Opinion 2016-01 ("Ethic") advised that a for profit company, not owned or controlled by a political party, political committee or candidate, that regularly produced and distributed political news and commentary through its app and website was entitled to the media exemption. Like GAI, "Ethic's distribution of news content and commentary is at the core of its operations, as its business model involves the regular and continued production and distribution of news and political commentary." (at 4) Also, see Advisory Opinion 2000-13 which found that publishing organized news and commentary on a website qualifies for the media exemption. Specifically, the Commission concluded at page 3. ("The website provides direct access to governmental and business news events, and its two prominent journalists generate reports, interviews, and commentary on current affairs. Moreover, the web site is viewable by the

general public and akin to a periodical or news program distributed to the general public. *See Advisory Opinion 1982-58*")

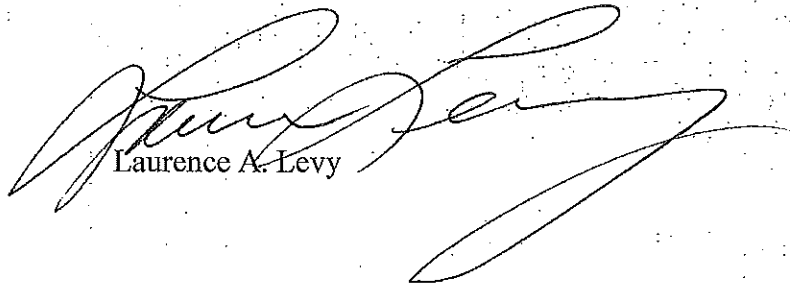
The Commission dismissed MUR's 7218, 7224, 7231, 726, 7237, 7238, 7239, 7240, and, 7241, on, or about August 10, 2017. The complaints all alleged various media outlets, including the New York Times and Comcast Corporation violated FECA by publishing certain political news. The analysis leading to the dismissal is equally applicable to GAI and its journalistic endeavors, leading to the conclusion the GAI is a press entity entitled to the media exception. The factoral and legal analysis at 4 stated, "The Commission uses a two-step analysis to determine whether the media exemption applies. First, the Commission considers whether the entity produces, on a regular basis, a program that disseminates news stories, editorials, and/or commentary. Second, the Commission considers two factors in determining the scope of the exemption: (1) whether the press entity is owned or controlled by a political party, political committee, or candidate, and if not, (2) whether the media entity is acting as a media entity in conducting the activity at issue (i.e. whether the entity is acting in its "legitimate press function"). With respect to the second factor, when determining whether an entity is engaging in a legitimate media function, the Commission examines (1) whether an entity's materials are available to the general public; and (2) whether they are comparable in form to those ordinarily issued by the entity. (internal cites omitted)". As demonstrated herein, GAI is, and has operated as a press entity, regularly researching and reporting matters of public concern, to the public, and it is not owned or controlled by any political entity.

The aforementioned recent Advisory Opinion follows a long line of court decisions, Advisory Opinions and regulatory enactments endorsing the First Amendments protections offered to the press. GAI is in the non-profit business of researching and writing about the efficiency and integrity of government institutions and actors. It has a seven-year history of hundreds of publications, investigative reports and political commentary regularly reported through its website, social media, books and in coordination with traditional media. Moreover, like the New York Times which often is called the "Paper of Record," GAI's work is frequently the basis of news stories, blogs, tweets and even in depth reports by 60 minutes and other broadcast media. GAI reporters and researches provide the facts that have driven many of the most important stories in America.

It has regularly published its journalistic findings without fear or favor, it isn't owned or controlled by any political party, political committee or candidate, and its books have been acclaimed as "best sellers" by the New York Times. By every standard established by the Commission and the Courts, GAI is a qualified journalistic entity entitled to recognition as a press or media entity. As such, it is exempt for FECA's disclaimer reporting requirements and its published work is not a political contribution.

We are available should the Commission require additional information. We look forward to an expeditious response.

Sincerely,

A handwritten signature in black ink, appearing to read "Laurence A. Levy", is written over the printed name. The signature is fluid and cursive, with a large, sweeping "L" and "A".

cc: Peter Schweizer
Stuart Christmas

EXHIBIT 1

Delaware

PAGE 1

'The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF INCORPORATION OF "GOVERNMENT ACCOUNTABILITY INSTITUTE", FILED IN THIS OFFICE ON THE SEVENTEENTH DAY OF FEBRUARY, A.D. 2012, AT 5:44 O'CLOCK P.M.


A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE NEW CASTLE COUNTY RECORDER OF DEEDS.

5111654 8100

120189643

You may verify this certificate online
at corp.delaware.gov/authver.shtml




Jeffrey W. Bullock, Secretary of State
AUTHENTICATION: 9375011

DATE: 02-20-12

CERTIFICATE OF INCORPORATION

OF

Government Accountability Institute
(A NON-STOCK CORPORATION)

I, the undersigned natural person of the age of twenty one (21) years or more, acting as incorporator of a non-stock corporation, adopt the following Certificate of Incorporation for such corporation pursuant to the Delaware General Corporation Law.

ARTICLE I

NAME

The name of the corporation is Government Accountability Institute (hereinafter the "Corporation").

ARTICLE II

DURATION

The period of duration of the Corporation is perpetual.

ARTICLE III

PURPOSES

The Corporation shall be a non-profit corporation.

The purposes for which the Corporation is organized and operated are to engage exclusively in such charitable, educational, and scientific activities as may qualify it for exemption from federal income tax under Section 501(c)(3) of the Internal Revenue Code (hereinafter the "Code"). To the extent not inconsistent with the immediately preceding sentence, the Corporation shall be empowered to exercise all power and authority granted to it under the Delaware General Corporation Law, or otherwise, including, but not limited to, the power to (i) accept donations of money or property, whether real or personal, or any interest therein, wherever situated, (ii) maintain control and discretion over the use of funds received by the Corporation, and (iii) monitor the use of funds made available by the Corporation to assure that the funds are used in conformity with the intended purposes.

ARTICLE IV
MEMBERSHIP

The Corporation shall have one or more classes of membership with such rights as provided for in this Certificate of Incorporation and the Bylaws, except that members may not be entitled to vote on any matter except as otherwise provided for in the Bylaws. Conditions for membership shall be set forth in the Bylaws.

ARTICLE V
STOCK

The Corporation shall have no capital stock.

ARTICLE VI
DIRECTORS

The affairs of the Corporation shall be managed by its Board of Directors. The Board of Directors shall have all powers necessary or appropriate for the administration of the affairs of the Corporation and may perform all acts in furtherance thereof as are not forbidden to the Directors by law, this Certificate of Incorporation, or the Bylaws.

The manner of election or appointment of Directors shall be provided in the Bylaws. The number of members of the Board of Directors shall be set in the manner provided in the Bylaws, but in no event shall there be fewer than one (1) Director.

ARTICLE VII
BYLAWS

The internal affairs of the Corporation shall be regulated by the Bylaws, and the Board of Directors shall supervise the management of the business and affairs of the Corporation

in accordance with the Bylaws. The power to amend or repeal the Bylaws shall be vested in the Board of Directors except to the extent otherwise provided in the Bylaws.

ARTICLE VIII
LIMITATIONS ON ACTIVITY

At all times, notwithstanding merger, consolidation, reorganization, termination, dissolution, or winding up of the Corporation, whether voluntary or involuntary or by operation of law, or any other provision of this Certificate of Incorporation:

A. the Corporation shall not possess or exercise any power or authority, or engage directly or indirectly in any activity, that will or might prevent it at any time from qualifying and continuing to qualify as a corporation described in Code Sections 501(c)(3) and 170(c)(2), contributions to which are deductible for federal income tax purposes under Code Section 170(a)(1);

B. no part of the assets or net earnings of the Corporation shall ever be used, nor shall the Corporation ever be organized or operated, for purposes that are not exclusively charitable, educational, scientific, or literary within the meaning of Code Section 501(c)(3);

C. no substantial part of the activities of the Corporation shall consist of carrying on of propaganda or otherwise attempting to influence legislation, nor shall the Corporation in any manner or to any extent (including by publication or distribution of statements) participate or intervene in any political campaign on behalf of (or in opposition to) any candidate for public office. To the extent that Code Section 501 is at any time amended to permit participation or intervention in a political campaign or to permit to a greater extent the carrying on of propaganda or otherwise attempting to influence legislation by an organization

subject to its provisions, the Corporation shall be authorized to carry on such activities to the extent permitted by Section 501 as amended:

D. pursuant to the prohibition contained in Code Section 501(c)(3), no part of the net earnings of the Corporation shall ever inure to the benefit of or be distributable to its Directors, officers, or other private persons, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in Article III above; and

E. notwithstanding any other provision of this Certificate of Incorporation, if at any time or times the Corporation is a private foundation within the meaning of Code Section 509, then during such time or times:

(1) the Corporation shall not engage in any act of self-dealing as defined in Code Section 4941;

(2) the Corporation shall distribute its income for each taxable year at such time and in such manner as not to subject the Corporation to the tax on undistributed income imposed by Code Section 4942;

(3) the Corporation shall not retain any excess business holdings as defined in Code Section 4943;

(4) the Corporation shall not make any investments in such a manner as to subject the Corporation to tax under Code Section 4944; and

(5) the Corporation shall not make any taxable expenditures as defined in Code Section 4945.

ARTICLE IX
LIMITATION ON PERSONAL LIABILITY

The personal liability of the Directors of the Corporation is hereby eliminated to the fullest extent permitted by the General Corporation Law of Delaware, as the same exists or may hereafter be amended. No amendment or repeal of this paragraph shall apply to or have any effect on the liability or alleged liability of any Director of the Corporation for or with respect to any act or omission on the part of such Director occurring prior to such amendment or repeal.

The private property, both real and personal, of the members of the Board of Directors and the officers of the Corporation shall not be subject to the payment of corporate debts to any extent whatsoever.

ARTICLE X
INDEMNIFICATION

The Corporation shall indemnify its directors, officers, employees and agents to the fullest extent permitted by the Delaware General Corporation Law, as the same exists or may hereafter be amended, except to the extent that such indemnification would result in an excise tax under Chapter 42 of the Code.

ARTICLE XI
DISSOLUTION

Upon dissolution of the Corporation, the Board of Directors shall:

- A. pay or make provision for the payment of all the Corporation's liabilities;

B. return, transfer, or convey (or make provision therefor) all assets held by the Corporation upon condition requiring such return, transfer, or conveyance in the event of dissolution of the Corporation; and

C. dispose of the Corporation's remaining assets exclusively for the purposes of the Corporation or distribute the assets to an organization or organizations organized and operated exclusively for charitable, educational, scientific, religious or literary purposes as shall, at that time, qualify for exemption under Code Section 501(c)(3), as the Directors shall determine; provided that none of such assets shall be distributed to any corporation, fund, or foundation any part of whose net earnings inures to the benefit of or is distributable to any individual or any corporation for profit. Any such assets not so disposed of shall be disposed of by the circuit court of the city or county in which the principal office of the Corporation is then located, to be used exclusively for purposes that are charitable, educational, scientific, religious or literary within the meaning of Code Section 501(c)(3), or to an organization or organizations organized and operated exclusively for such purposes.

ARTICLE XII DEFINED TERMS

As used in this Certificate of Incorporation, the terms "Internal Revenue Code" and "Code" mean the United States Internal Revenue Code of 1986, as amended, and a reference to a provision of that Code shall be deemed to indicate the corresponding provision of any future United States Internal Revenue law.

ARTICLE XIII
REGISTERED OFFICE AND REGISTERED AGENT

The address of the Corporation's Registered Office in the State of Delaware is to be located at: 2711 Centerville Road, Suite 400, in the City of Wilmington, DE 19808, County of New Castle. The name of the Corporation's registered agent at such address is Corporation Service Company.

ARTICLE XIV
INCORPORATOR

The name and address of the Incorporator is:

<u>Name</u>	<u>Address</u>
Barnaby Zall	7018 Tilden Lane, Rockville MD 20852

I, THE UNDERSIGNED, being the incorporator hereinbefore named, for the purpose of forming a corporation pursuant to Chapter I of Title 8 of the Delaware Code, do make this Certificate, hereby declaring and certifying that the facts herein stated are true, and accordingly hereunto set my hand this 17th day of February, A.D. 2012.



Barnaby Zall
Incorporator

EXHIBIT 2

Form **990**Department of the Treasury
Internal Revenue Service**Return of Organization Exempt From Income Tax**

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

▶ Do not enter social security numbers on this form as it may be made public.

▶ Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

2017

Open to Public Inspection

A For the 2017 calendar year, or tax year beginning

and ending

B Check if applicable:

- ☐ Address change
☐ Name change
☐ Initial return
☐ Final return/terminated
☐ Amended return
☐ Application pending

C Name of organization

GOVERNMENT ACCOUNTABILITY INSTITUTE

Doing business as

Number and street (or P.O. box if mail is not delivered to street address)

1414 PIEDMONT DRIVE EAST

City or town, state or province, country, and ZIP or foreign postal code

TALLAHASSEE, FL 32308

F Name and address of principal officer: PETER SCHWEIZER

SAME AS C ABOVE

D Employer identification number

-*1912

E Telephone number

850-329-7259

G Gross receipts \$

2,457,699

H(a) Is this a group return

for subordinates? ☐ Yes ☒ NoH(b) Are all subordinates included? ☐ Yes ☒ No

if "No," attach a list. (see instructions)

H(c) Group exemption number ▶

I Tax-exempt status: ☒ 501(c)(3) ☐ 501(c) () (insert no.) ☐ 4947(a)(1) or ☐ 527J Website: www.G-A-I.ORGK Form of organization: ☒ Corporation ☐ Trust ☐ Association ☐ Other ▶

L Year of formation: 2012

M State of legal domicile: DE

Part I Summary

Activities & Governance	1	Briefly describe the organization's mission or most significant activities: TO INVESTIGATE AND EXPOSE CRONY CAPITALISM, MISUSE OF TAXPAYERS MONIES, AND OTHER GOVERNMENTAL		
	2	Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets.		
	3	Number of voting members of the governing body (Part VI, line 1a)	5	
	4	Number of independent voting members of the governing body (Part VI, line 1b)	3	
	5	Total number of individuals employed in calendar year 2017 (Part V, line 2a)	26	
	6	Total number of volunteers (estimate if necessary)	0	
	Revenue	7a	Total unrelated business revenue from Part VIII, column (C), line 12	0.
7b		Net unrelated business taxable income from Form 990-T, line 34	0.	
8		Contributions and grants (Part VIII, line 1h)	2,601,000.	
9		Program service revenue (Part VIII, line 2g)	371.	
10		Investment income (Part VIII, column (A), lines 3, 4, and 7d)	11.	
11		Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	0.	
12		Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)	2,601,382.	
Expenses		13	Grants and similar amounts paid (Part IX, column (A), lines 1-3)	0.
		14	Benefits paid to or for members (Part IX, column (A), line 4)	0.
		15	Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)	1,454,771.
	16a	Professional fundraising fees (Part IX, column (A), line 11e)	0.	
	17	b Total fundraising expenses (Part IX, column (D), line 25)	58,385.	
	18	Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)	792,279.	
	19	Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)	2,247,050.	
	Net Assets or Fund Balances	20	Total assets (Part X, line 16)	448,782.
21		Total liabilities (Part X, line 26)	177,534.	
22		Net assets or fund balances. Subtract line 21 from line 20	271,248.	

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here	Signature of officer	Date
	PETER SCHWEIZER, PRESIDENT	
Preparer	Print/Type preparer's name	Preparer's signature
	JOHN KRILLOR	
Use Only	Firm's name	Firm's EIN
	LANIGAN & ASSOCIATES, P.C.	**--***4721
	Firm's address	Phone no.
	2630 CENTENNIAL PLACE	850-893-8418
	TALLAHASSEE, FL 32308	

May the IRS discuss this return with the preparer shown above? (see instructions)

☒ Yes ☐ No

732001 11-28-17 LHA For Paperwork Reduction Act Notice, see the separate instructions.

Form 990 (2017)

SEE SCHEDULE O FOR ORGANIZATION MISSION STATEMENT CONTINUATION

Part III Statement of Program Service AccomplishmentsCheck if Schedule O contains a response or note to any line in this Part III ☐

1 Briefly describe the organization's mission:
 TO INVESTIGATE AND EXPOSE CRONY CAPITALISM, MISUSE OF TAXPAYER MONIES,
 AND OTHER GOVERNMENTAL CORRUPTION OR MALFEASANCE,

2 Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? ☐ Yes ☒ No

If "Yes," describe these new services on Schedule O.

3 Did the organization cease conducting, or make significant changes in how it conducts, any program services? ☐ Yes ☒ No

If "Yes," describe these changes on Schedule O.

4 Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.

4a (Code:) (Expenses \$ 1,721,409. Including grants of \$) (Revenue \$ 22,439.)
 THE GOVERNMENT ACCOUNTABILITY INSTITUTE (GAI) PRODUCES DETAILED
 INVESTIGATIONS OF CRONYISM AND GOVERNMENT CORRUPTION TO EDUCATE
 CITIZENS ON THE NEED TO PROTECT FREE MARKETS. GAI PRODUCES REPORTS AND
 PARTNERS WITH NATIONAL MEDIA TO ADVANCE FREE MARKET PRINCIPLES. GAI'S
 WORK HAS BEEN FEATURED ON CNN, NPR NEWS, NY TIMES, NATIONAL REVIEW, 60
 MINUTES, ABC NEWS, NY POST, FOX NEWS, POLITICO, WASHINGTON TIMES,
 FORBES, AND NUMEROUS OTHERS.

4b (Code:) (Expenses \$ Including grants of \$) (Revenue \$)

4c (Code:) (Expenses \$ Including grants of \$) (Revenue \$)

4d Other program services (Describe in Schedule O.)
 (Expenses \$ Including grants of \$) (Revenue \$)

4e Total program service expenses 1,721,409.

Form 990 (2017)

Part IV Checklist of Required Schedules

	Yes	No
1 Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A	1 X	
2 Is the organization required to complete Schedule B, Schedule of Contributors?	2 X	
3 Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I	3	X
4 Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II	4	X
5 Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Revenue Procedure 98-19? If "Yes," complete Schedule C, Part III	5	X
6 Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I	6	X
7 Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II	7	X
8 Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete Schedule D, Part III	8	X
9 Did the organization report an amount in Part X, line 21, for escrow or custodial account liability, serve as a custodian for amounts not listed in Part X, or provide credit counseling, debt management, credit repair, or debt negotiation services? If "Yes," complete Schedule D, Part IV	9	X
10 Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi-endowments? If "Yes," complete Schedule D, Part V	10	X
11 If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X as applicable.		
a Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D, Part VI	11a X	
b Did the organization report an amount for investments - other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII	11b	X
c Did the organization report an amount for investments - program related in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII	11c	X
d Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part IX	11d	X
e Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X	11e X	
f Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X	11f X	
12a Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI and XII	12a X	
b Was the organization included in consolidated, independent audited financial statements for the tax year? If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional	12b	X
13 Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	13	X
14a Did the organization maintain an office, employees, or agents outside of the United States?	14a	X
b Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If "Yes," complete Schedule F, Parts I and IV	14b	X
15 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If "Yes," complete Schedule F, Parts II and IV	15	X
16 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV	16	X
17 Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I	17	X
18 Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? If "Yes," complete Schedule G, Part II	18	X
19 Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If "Yes," complete Schedule G, Part III	19	X

Form 990 (2017)

Part IV Checklist of Required Schedules (continued)

	Yes	No
20a Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H		x
b If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?		
21 Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or domestic government on Part IX, column (A), line 1? If "Yes," complete Schedule I, Parts I and II		x
22 Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on Part IX, column (A), line 2? If "Yes," complete Schedule I, Parts I and III		x
23 Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5 about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? If "Yes," complete Schedule J	x	
24a Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that was issued after December 31, 2002? If "Yes," answer lines 24b through 24d and complete Schedule K. If "No," go to line 25a		x
b Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?		
c Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds?		
d Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?		
25a Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in an excess benefit transaction with a disqualified person during the year? If "Yes," complete Schedule L, Part I		x
b Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? If "Yes," complete Schedule L, Part I		x
26 Did the organization report any amount on Part X, line 5, 6, or 22 for receivables from or payables to any current or former officers, directors, trustees, key employees, highest compensated employees, or disqualified persons? If "Yes," complete Schedule L, Part II		x
27 Did the organization provide a grant or other assistance to an officer, director, trustee, key employee, substantial contributor or employee thereof, a grant selection committee member, or to a 35% controlled entity or family member of any of these persons? If "Yes," complete Schedule L, Part III		x
28 Was the organization a party to a business transaction with one of the following parties (see Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions):		
a A current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part IV		x
b A family member of a current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part IV		x
c An entity of which a current or former officer, director, trustee, or key employee (or a family member thereof) was an officer, director, trustee, or direct or indirect owner? If "Yes," complete Schedule L, Part IV		x
29 Did the organization receive more than \$25,000 in non-cash contributions? If "Yes," complete Schedule M		x
30 Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? If "Yes," complete Schedule M		x
31 Did the organization liquidate, terminate, or dissolve and cease operations?		x
If "Yes," complete Schedule N, Part I		
32 Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? If "Yes," complete Schedule N, Part II		x
33 Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? If "Yes," complete Schedule R, Part I		x
34 Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Part II, III, or IV, and Part V, line 1		x
35a Did the organization have a controlled entity within the meaning of section 512(b)(13)?	x	
b If "Yes" to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? If "Yes," complete Schedule R, Part V, line 2		x
36 Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable related organization? If "Yes," complete Schedule R, Part V, line 2		x
37 Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI		x
38 Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11b and 19?	x	

Note. All Form 990 filers are required to complete Schedule O.

Form 990 (2017)

Part V Statements Regarding Other IRS Filings and Tax ComplianceCheck if Schedule O contains a response or note to any line in this Part V ☐

		Yes	No
1a	Enter the number reported in Box 3 of Form 1096. Enter -0- if not applicable		
b	Enter the number of Forms W-2G included in line 1a. Enter -0- if not applicable		
c	Did the organization comply with backup withholding rules for reportable payments to vendors and reportable gaming (gambling) winnings to prize winners?	x	
2a	Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements, filed for the calendar year ending with or within the year covered by this return	26	
b	If at least one is reported on line 2a, did the organization file all required federal employment tax returns?	x	
Note. If the sum of lines 1a and 2a is greater than 250, you may be required to e-file (see instructions)			
3a	Did the organization have unrelated business gross income of \$1,000 or more during the year?		x
b	If "Yes," has it filed a Form 990-T for this year? If "No," to line 3b, provide an explanation in Schedule O		
4a	At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a financial account in a foreign country (such as a bank account, securities account, or other financial account)?		x
b	If "Yes," enter the name of the foreign country: ▶		
See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR).			
5a	Was the organization a party to a prohibited tax shelter transaction at any time during the tax year?		x
b	Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?		x
c	If "Yes," to line 5a or 5b, did the organization file Form 8888-T?		
6a	Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization solicit any contributions that were not tax deductible as charitable contributions?		x
b	If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible?		
7	Organizations that may receive deductible contributions under section 170(c).		
a	Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and services provided to the payor?		x
b	If "Yes," did the organization notify the donor of the value of the goods or services provided?		
c	Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was required to file Form 8282?		x
d	If "Yes," indicate the number of Forms 8282 filed during the year	7d	
e	Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?		x
f	Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract?		x
g	If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required?		
h	If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a Form 1099-C?		
8	Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained by the sponsoring organization have excess business holdings at any time during the year?		
9	Sponsoring organizations maintaining donor advised funds.		
a	Did the sponsoring organization make any taxable distributions under section 4966?		
b	Did the sponsoring organization make a distribution to a donor, donor advisor, or related person?		
10	Section 501(c)(7) organizations. Enter:		
a	Initiation fees and capital contributions included on Part VIII, line 12	10a	
b	Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities	10b	
11	Section 501(c)(12) organizations. Enter:		
a	Gross income from members or shareholders	11a	
b	Gross income from other sources (Do not net amounts due or paid to other sources against amounts due or received from them.)	11b	
12a	Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 990 in lieu of Form 1041?		
b	If "Yes," enter the amount of tax-exempt interest received or accrued during the year	12b	
13	Section 501(c)(29) qualified nonprofit health insurance issuers.		
a	Is the organization licensed to issue qualified health plans in more than one state?		
Note. See the instructions for additional information the organization must report on Schedule O.			
b	Enter the amount of reserves the organization is required to maintain by the states in which the organization is licensed to issue qualified health plans	13b	
c	Enter the amount of reserves on hand	13c	
14a	Did the organization receive any payments for indoor tanning services during the tax year?		x
b	If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation in Schedule O	14b	

Form 990 (2017)

Part VI Governance, Management, and Disclosure For each "Yes" response to lines 2 through 7b below, and for a "No" response to line 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Schedule O. See instructions.

Check if Schedule O contains a response or note to any line in this Part VI ☒ X

Section A. Governing Body and Management

	1a	1b	2	3	4	5	6	7a	7b	8a	8b	9
1a Enter the number of voting members of the governing body at the end of the tax year	5											
If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain in Schedule O.		3										
b Enter the number of voting members included in line 1a, above, who are independent												
2 Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other officer, director, trustee, or key employee?			2									X
3 Did the organization delegate control over management duties customarily performed by or under the direct supervision of officers, directors, or trustees, or key employees to a management company or other person?				3								X
4 Did the organization make any significant changes to its governing documents since the prior Form 990 was filed?				4								X
5 Did the organization become aware during the year of a significant diversion of the organization's assets?				5								X
6 Did the organization have members or stockholders?				6								X
7a Did the organization have members, stockholders, or other persons who had the power to elect or appoint one or more members of the governing body?				7a								X
b Are any governance decisions of the organization reserved to (or subject to approval by) members, stockholders, or persons other than the governing body?				7b								X
8 Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following:												
a The governing body?				8a						X		
b Each committee with authority to act on behalf of the governing body?				8b						X		
9 Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the organization's mailing address? If "Yes," provide the names and addresses in Schedule O				9								X

Section B. Policies (This Section B requests information about policies not required by the Internal Revenue Code.)

	10a	10b	11a	12a	12b	12c	13	14	15a	15b	16a	16b
10a Did the organization have local chapters, branches, or affiliates?												
b If "Yes," did the organization have written policies and procedures governing the activities of such chapters, affiliates, and branches to ensure their operations are consistent with the organization's exempt purposes?												
11a Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form?			X									
b Describe in Schedule O the process, if any, used by the organization to review this Form 990.												
12a Did the organization have a written conflict of interest policy? If "No," go to line 13				X								
b Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts?					X							
c Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe in Schedule O how this was done						X						
13 Did the organization have a written whistleblower policy?						X						
14 Did the organization have a written document retention and destruction policy?						X						
15 Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision?												
a The organization's CEO, Executive Director, or top management official												X
b Other officers or key employees of the organization												X
If "Yes" to line 15a or 15b, describe the process in Schedule O (see instructions).												
16a Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement with a taxable entity during the year?											X	
b If "Yes," did the organization follow a written policy or procedure requiring the organization to evaluate its participation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization's exempt status with respect to such arrangements?												

Section C. Disclosure

17 List the states with which a copy of this Form 990 is required to be filed **NONE**

18 Section 6104 requires an organization to make its Forms 1023 (or 1024 if applicable), 990, and 990-T (Section 501(c)(3)s only) available for public inspection. Indicate how you made these available. Check all that apply.

☐ Own website ☐ Another's website ☒ Upon request ☐ Other (explain in Schedule O)

19 Describe in Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to the public during the tax year.

20 State the name, address, and telephone number of the person who possesses the organization's books and records:

JENNIFER A. BRITT - 850-329-7259

119 S. MONROE STREET, SUITE 202, TALLAHASSEE, FL 32301

Form 990 (2017) **GOVERNMENT ACCOUNTABILITY INSTITUTE**
Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

Check if Schedule O contains a response or note to any line in this Part VII

Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

1a Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization's tax year.

- 1a Complete this table for all persons required to be listed. Report compensation for the calendar year ending on 12/31/2011.
- List all of the organization's current officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation. Enter -0- in columns (D), (E), and (F) if no compensation was paid.
- List all of the organization's current key employees, if any. See instructions for definition of "key employee."
- List the organization's five current highest compensated employees (other than an officer, director, trustee, or key employee) who received reportable compensation (Box 5 of Form W-2 and/or Box 7 of Form 1099-MISC) of more than \$100,000 from the organization and any related organizations.
- List all of the organization's former officers, key employees, and highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations.
- List all of the organization's former directors or trustees that received, in the capacity as a former director or trustee of the organization, more than \$10,000 of reportable compensation from the organization and any related organizations.
- List persons in the following order: individual trustees or directors; institutional trustees; officers; key employees; highest compensated employees; and former such persons.

☐ Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee.

[illegible]

Part VIII Statement of RevenueCheck if Schedule O contains a response or note to any line in this Part VIII ☐

		(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512-514
Contributions, Gifts, Grants and Other Similar Amounts	1 a Federated campaigns	1a			
	b Membership dues	1b			
	c Fundraising events	1c			
	d Related organizations	1d			
	e Government grants (contributions)	1e			
	f All other contributions, gifts, grants, and similar amounts not included above	1f	2,435,250.		
	g Noncash contributions included in lines 1a-1f: \$		2,435,250.		
	h Total. Add lines 1a-1f		2,435,250.		
Program Service Revenue	2 a	Business Code			
	b				
	c				
	d				
	e				22,439.
	f All other program service revenue	900099	22,439.		
	g Total. Add lines 2a-2f		22,439.		
	3 Investment income (including dividends, interest, and other similar amounts)		10.		10.
4 Income from investment of tax-exempt bond proceeds					
5 Royalties	(i) Real (ii) Personal				
6 a Gross rents					
b Less: rental expenses					
c Rental income or (loss)					
d Net rental income or (loss)					
7 a Gross amount from sales of assets other than inventory	(i) Securities (ii) Other				
b Less: cost or other basis and sales expenses					
c Gain or (loss)					
d Net gain or (loss)					
8 a Gross income from fundraising events (not including \$ of contributions reported on line 1c). See Part IV, line 18	a				
b Less: direct expenses	b				
c Net income or (loss) from fundraising events					
9 a Gross income from gaming activities. See Part IV, line 19	a				
b Less: direct expenses	b				
c Net income or (loss) from gaming activities					
10 a Gross sales of inventory, less returns and allowances	a				
b Less: cost of goods sold	b				
c Net income or (loss) from sales of inventory					
Miscellaneous Revenue		Business Code			
11 a					
b					
c					
d All other revenue					
e Total. Add lines 11a-11d		2,457,699.	0.	0.	22,449.
12 Total revenue. See instructions.		2,457,699.	0.	0.	22,449.

Part IX Statement of Functional Expenses

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).

Check if Schedule O contains a response or note to any line in this Part IX ☐

Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1 Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21				
2 Grants and other assistance to domestic individuals. See Part IV, line 22				
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16				
4 Benefits paid to or for members				
5 Compensation of current officers, directors, trustees, and key employees	370,000.	222,000.	127,000.	21,000.
6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B)	827,287.	661,829.	165,458.	
7 Other salaries and wages				
8 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions)	144,677.	115,742.	28,935.	
9 Other employee benefits	75,036.	60,029.	15,007.	
10 Payroll taxes				
11 Fees for services (non-employees):				
a Management	1,020.		1,020.	
b Legal	39,200.		39,200.	
c Accounting				
d Lobbying				
e Professional fundraising services. See Part IV, line 17				
f Investment management fees				
g Other. (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Sch O.)	6,855.	4,675.	2,180.	
12 Advertising and promotion	32,022.	940.	31,082.	
13 Office expenses				
14 Information technology				
15 Royalties	76,887.		76,887.	
16 Occupancy	55,071.	11,014.	44,057.	
17 Travel				
18 Payments of travel or entertainment expenses for any federal, state, or local public officials				
19 Conferences, conventions, and meetings				
20 Interest				
21 Payments to affiliates	22,310.		22,310.	
22 Depreciation, depletion, and amortization	15,105.	12,084.	3,021.	
23 Insurance				
24 Other expenses. Itemize expenses not covered above. (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)				
a OUTSIDE CONTRACT SERVICE	299,650.	299,650.		
b BOOKS, SUBSCRIPTIONS, R	297,068.	297,068.		
c GENERAL RELATIONS SERV	37,385.			37,385.
d AWARDS AND GRANTS	25,000.	25,000.		
e All other expenses	36,285.	11,378.	24,907.	
25 Total functional expenses. Add lines 1 through 24e	2,360,858.	1,721,409.	581,064.	58,385.
26 Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation.				

Check here ☐ if following SCP 98-2 (ASC 958-725)

Part X Balance SheetCheck if Schedule O contains a response or note to any line in this Part X ☐

		(A) Beginning of year		(B) End of year
Assets	1 Cash - non-interest-bearing	350,409.	1	476,828.
	2 Savings and temporary cash investments		2	
	3 Pledges and grants receivable, net		3	
	4 Accounts receivable, net		4	
	5 Loans and other receivables from current and former officers, directors, trustees, key employees, and highest compensated employees. Complete Part II of Schedule L		5	
	6 Loans and other receivables from other disqualified persons (as defined under section 4958(f)(1)), persons described in section 4958(c)(3)(B), and contributing employers and sponsoring organizations of section 501(c)(3) voluntary employees' beneficiary organizations (see instr.). Complete Part II of Sch L		6	
	7 Notes and loans receivable, net		7	
	8 Inventories for sale or use		8	
	9 Prepaid expenses and deferred charges	21,248.	9	24,069.
	10a Land, buildings, and equipment: cost or other basis. Complete Part VI of Schedule D	10a 188,789.		
	b Less: accumulated depreciation	10b 146,164.		
	11 Investments - publicly traded securities	63,439.	10c	42,625.
	12 Investments - other securities. See Part IV, line 11		11	
	13 Investments - program-related. See Part IV, line 11		12	
	14 Intangible assets		13	
	15 Other assets. See Part IV, line 11	13,686.	14	13,686.
16 Total assets. Add lines 1 through 15 (must equal line 34)	448,782.	15	557,208.	
Liabilities	17 Accounts payable and accrued expenses	62,005.	16	59,532.
	18 Grants payable		17	
	19 Deferred revenue		18	
	20 Tax-exempt bond liabilities		19	
	21 Escrow or custodial account liability. Complete Part IV of Schedule D		20	
	22 Loans and other payables to current and former officers, directors, trustees, key employees, highest compensated employees, and disqualified persons. Complete Part II of Schedule L		21	
	23 Secured mortgages and notes payable to unrelated third parties		22	
	24 Unsecured notes and loans payable to unrelated third parties		23	
	25 Other liabilities (including federal income tax, payables to related third parties, and other liabilities not included on lines 17-24). Complete Part X of Schedule D		24	
	26 Total liabilities. Add lines 17 through 25	115,529.	25	129,587.
Net Assets or Fund Balances	27 Organizations that follow SFAS 117 (ASC 958), check here <input checked="" type="checkbox"/> and complete lines 27 through 29, and lines 33 and 34.	177,534.	26	189,119.
	28 Unrestricted net assets	271,248.	27	368,089.
	29 Temporarily restricted net assets		28	
	30 Permanently restricted net assets		29	
	31 Organizations that do not follow SFAS 117 (ASC 958), check here <input type="checkbox"/> and complete lines 30 through 34.		30	
	32 Capital stock or trust principal, or current funds		31	
	33 Paid-in or capital surplus, or land, building, or equipment fund		32	
	34 Retained earnings, endowment, accumulated income, or other funds	271,248.	33	368,089.
	35 Total net assets or fund balances	448,782.	34	557,208.

Form 990 (2017)

Part XI Reconciliation of Net AssetsCheck if Schedule O contains a response or note to any line in this Part XI ☐

1	Total revenue (must equal Part VIII, column (A), line 12)	1	2,457,699.
2	Total expenses (must equal Part IX, column (A), line 25)	2	2,360,856.
3	Revenue less expenses. Subtract line 2 from line 1	3	96,843.
4	Net assets or fund balances at beginning of year (must equal Part X, line 33, column (A))	4	271,248.
5	Net unrealized gains (losses) on investments	5	
6	Donated services and use of facilities	6	
7	Investment expenses	7	
8	Prior-period adjustments	8	
9	Other changes in net assets or fund balances (explain in Schedule O)	9	0.
10	Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line 33, column (B))	10	368,089.

Part XII Financial Statements and ReportingCheck if Schedule O contains a response or note to any line in this Part XII ☐

	Yes	No
1 Accounting method used to prepare the Form 990: <input type="checkbox"/> Cash <input checked="" type="checkbox"/> Accrual <input type="checkbox"/> Other _____ If the organization changed its method of accounting from a prior year or checked "Other," explain in Schedule O.		
2a Were the organization's financial statements compiled or reviewed by an independent accountant? If "Yes," check a box below to indicate whether the financial statements for the year were compiled or reviewed on a separate basis, consolidated basis, or both: <input type="checkbox"/> Separate basis <input type="checkbox"/> Consolidated basis <input type="checkbox"/> Both consolidated and separate basis		X
b Were the organization's financial statements audited by an independent accountant? If "Yes," check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both: <input checked="" type="checkbox"/> Separate basis <input type="checkbox"/> Consolidated basis <input type="checkbox"/> Both consolidated and separate basis	X	
c If "Yes" to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant? If the organization changed either its oversight process or selection process during the tax year, explain in Schedule O.		X
3a As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Single Audit Act and OMB Circular A-133?		X
b If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why in Schedule O and describe any steps taken to undergo such audits		

Form 990 (2017)

EXHIBIT 3

Subject: FW: ICE FOIA Request 2019-ICFO-33806

Date: Wednesday, April 10, 2019 at 10:50:47 AM Eastern Daylight Time

From: Caleb Stephens <Caleb.Stephens@g-a-i.org>

To: Hannah Cooperman <Hannah.Cooperman@g-a-i.org>, Stuart Christmas <Stuart.Christmas@g-a-i.org>

From: ice-foia@dhs.gov <ice-foia@dhs.gov>

Sent: Wednesday, April 10, 2019 10:10 AM

To: Caleb Stephens <Caleb.Stephens@g-a-i.org>

Subject: ICE FOIA Request 2019-ICFO-33806

April 10, 2019

Caleb Stephens
Government Accountability Institute
1414 Piedmont Dr NE
Tallahassee, FL 32308

RE: ICE FOIA Case Number 2019-ICFO-33806

Dear Mr. Stephens:

This acknowledges receipt of your April 08, 2019, Freedom of Information Act (FOIA) request to U.S. Immigration and Customs Enforcement (ICE), for requesting any communication, documentation, or documentation of communication regarding Cory Booker from 2006-present, or involving an email address ending in @booker.senate.gov. Your request was received in this office on April 08, 2019.

Due to the increasing number of FOIA requests received by this office, we may encounter some delay in processing your request. Per Section 5.5(a) of the DHS FOIA regulations, 6 C.F.R. Part 5, ICE processes FOIA requests according to their order of receipt. Although ICE's goal is to respond within 20 business days of receipt of your request, the FOIA does permit a 10- day extension of this time period. As your request seeks numerous documents that will necessitate a thorough and wide-ranging search, ICE will invoke a 10-day extension for your request, as allowed by Title 5 U.S.C. § 552(a)(6)(B). If you care to narrow the scope of your request, please contact our office. We will make every effort to comply with your request in a timely manner.

Provisions of the FOIA allow us to recover part of the cost of complying with your request. We shall charge you for records in accordance with the DHS Interim FOIA regulations, as they apply to media requesters. As a media requester, you will be charged 10 cents per page for duplication; the first 100 pages are free. We will construe the submission of your request as an agreement to pay up to \$25.00. You will be contacted before any further fees are accrued.

We have queried the appropriate program offices within ICE for responsive records. If any responsive records are located, they will be reviewed for determination of releasability. Please be assured that one of the processors in our office will respond to your request as expeditiously as possible. We appreciate your patience as we proceed with your request.

Your request has been assigned reference number **2019-ICFO-33806**. Please refer to this identifier in any future correspondence. To check the status of an ICE FOIA/PA request, please visit <http://www.dhs.gov/foia-status>. Please note that to check the status of a request, you must enter the 2019-ICFO-33806 tracking number. If you need any further assistance or would like to discuss any aspect of your request, please contact the FOIA office. You may send an e-mail to ice-foia@ice.dhs.gov, call toll free (866) 633-1182, or you may contact our FOIA Public Liaison, Fernando Pineiro, in the same manner. Additionally, you have a right to right

to seek dispute resolution services from the Office of Government Information Services (OGIS) which mediates disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. If you are requesting access to your own records (which is considered a Privacy Act request), you should know that OGIS does not have the authority to handle requests made under the Privacy Act of 1974. You may contact OGIS as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Regards,

ICE FOIA Office
Immigration and Customs Enforcement
Freedom of Information Act Office
500 12th Street, S.W., Stop 5009
Washington, D.C. 20536-5009
Telephone: 1-866-633-1182
Visit our FOIA website at www.ice.gov/foia



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

December 11, 2018

FOIA No.: 2018-11-109
OASIS No.: 1034320

Caleb Stephens
Government Accountability Institute
1414 Piedmont Drive
Tallahassee, FL 32308

VIA ELECTRONIC MAIL: caleb.stephens@g-a-i.org

Dear Mr. Stephens:

This acknowledges the modification of your November 21, 2018 Freedom of Information Act (FOIA), 5 U.S.C. § 552, request to the Department of the Treasury, seeking "Any records of communication, communication, or documentation to the Treasury Department Office of Foreign Assets Control or general Treasury Department officials who have supervision of the Office of Foreign Assets Control regarding Jane Sanders, Burlington College, or any email address ending in @sanders.senate.gov from 2006 to present." Treasury referred your request to the Office of Foreign Assets Control (OFAC) for processing on September 13, 2017.

In a phone call with the FOIA Office on December 7, 2018, you modified your request to "Any records of communications to OFAC officials (Director, OFAC; Deputy Director, OFAC; Associate Director, Office of Sanctions Policy and Implementation and the Assistant Director, Licensing) regarding Jane Sanders, Burlington College, or from email addresses ending in @sanders.senate.gov or @burlington.edu from 2006 to present.

OFAC generally processes its FOIA requests on a "first in, first out" basis. We may encounter some delay in processing your request since OFAC is experiencing a substantial backlog of FOIA requests that has adversely affected its response time. We will make every effort to comply with your request in a timely manner; however, there are approximately 190 open requests pending ahead of yours in our processing queue.

For fee purposes, we have determined that you are a "media" requester. The FOIA, specifically 5 U.S.C. § 552(a)(4)(A), and Treasury FOIA regulations at 31 C.F.R. § 1.7, allow us to recover part of the cost of addressing your request. As a "media" requester, you will be charged the cost of duplication only, excluding charges for the first 100 pages. Duplication will be assessed at 20-cents per page. We have construed your request to indicate your willingness to pay assessable fees up to \$25. However, since OFAC processes its responses electronically, any assessable fee will likely be de minimis. Your request for a fee waiver, therefore, is moot.

Please be aware that OFAC will neither confirm nor deny the existence of investigative records, pursuant to exemptions (b)(1), (b)(3) and (b)(7)(A) of the FOIA, unless there was an actual investigation that resulted in a designation or enforcement action, or the investigation is

Mr. Stephans

Page 2

publicized. The mere acknowledgement of an investigation could reveal classified information and thereby cause harm to our national security posture. Until an actual designation, enforcement action or public acknowledgement of an investigation by Treasury has occurred, release of any information confirming or denying the existence of an investigation could conceivably tip off the subjects of pending investigations.

The mere acknowledgement of an OFAC investigation would allow the subject of the investigation the opportunity to engage in asset flight and change their habits and routines such that an enforcement action or designation would be impossible to obtain. Conversely, if OFAC were to acknowledge that it was not investigating an individual that was actually involved in criminal activity, that information alone may embolden the individual in their continued criminal activities. For those entities and individuals subject to the Kingpin Act [21 U.S.C. § 1904] please be aware that all records or information obtained or created pursuant to the Kingpin Act is excluded from the provisions of the FOIA (5 U.S.C. § 552(a)(3)) pursuant to 21 U.S.C. § 1904(e)(3).

We will query the appropriate OFAC components for responsive records. If responsive records are located, they will be reviewed for determination on release. One of our analysts will respond to your request. We appreciate your patience as we proceed.

If you have any questions regarding this matter, you may email OFACFOIAOffice@treasury.gov or contact the FOIA Requester Service Center at (202) 622-2500, option 3. Please reference FOIA number 2018-11-109 in any future communications.

Sincerely,

Sara E.
Moss

Digitally signed
by Sara E. Moss
Date: 2018.12.11
14:51:36 -05'00'

Sara Elizabeth Moss, Ph.D., MLS
Senior FOIA Reviewer
Information Disclosure and Records Management
Office of Sanctions Support and Operations
Office of Foreign Assets Control



Department of Energy
Washington, DC 20585

DEC 31 2018

Caleb Stephens
Government Accountability Institute
1414 Piedmont Dr. E.
Tallahassee, FL 32308

Via email: caleb.stephens@g-a-i.org

Re: HQ-2019-00200-F

Dear Mr. Stephens:

This is an interim response to the request for information that you sent to the Department of Energy (DOE) under the Freedom of Information Act (FOIA), 5 U.S.C. § 552. You requested:

Any communications, documentation of communications, or documentation from 2006 to present regarding Senator Sanders, Jane Sanders, Carina Driscoll, any address containing @sanders.senate.gov, Champlain Housing Trust, the Vermont Economic Development Authority (VEDA), the Vermont Woodworking School, Burlington College, or the Texas Low-Level Radioactive Waste Disposal Compact Commission.

On November 28, 2018, in an email exchange with Ms. Rachel Fellows of this office, you identified the following program offices for your request: the Office of Congressional and Intergovernmental Affairs, the Office of Nuclear Energy, the Office of Enterprise Assessments, the Loan Programs Office, and the Office of Economic Impact and Diversity. In addition, you specified various search terms for these offices, as summarized below:

All Offices Listed:

"Senator Sanders"
"Bernie Sanders"
"Bernard Sanders"
"Jane Sanders"
"Jane O'Meara"
"Carina Driscoll"
"@sanders.senate.gov"
"the Vermont Economic Development Authority"
"VEDA"
"Burlington College"
"@burlington.edu"



Office of Enterprise Assessments, Office of Congressional and Intergovernmental Affairs, and Loan Programs Office:

"Champlain Housing Trust"

"CHT"

"Champlain Housing"

"Champlain Trust"

"Neighborworks Vermont"

"Neighborworks VT"

"Vermont Woodworking School"

Office of Congressional and Intergovernmental Affairs and Office of Nuclear Energy:

"the Texas Low-Level Radioactive Waste Disposal Compact Commission"

"TLLRWDC"

"Texas Compact Commission".

Your request has been assigned to DOE's Loans Program Office (LP), Office of Congressional and Intergovernmental Affairs (CI), Office of Nuclear Energy (NE), Office of Enterprise Assessments (EA), and Office of and Economic Impact and Diversity (ED). Upon completion of the search and the review of any documents located, you will be provided a response.

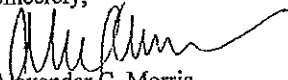
In a December 26, 2018, phone call, confirmed via email, with Ms. Angela Holmes of my office, you requested a waiver of all fees associated with processing of this request. For purposes of assessment of any fees, you have been categorized under the DOE regulation that implements the FOIA at Title 10, Code of Federal Regulations (CFR), § 1004.9(b)(3), as a "news media" requestor. Requestors in this category are provided two free hours of search time and 100 pages at no cost. At this time, it has not yet been determined if fees will exceed \$15.00, the minimum amount at which DOE assesses fees. For this reason, a determination on the waiver of fees has not been made. If it is determined that fees will exceed our standard allowance, your fee waiver request will be addressed at that time.

You may contact DOE's FOIA Public Liaison, Alexander Morris, FOIA Officer, Office of Public Information, at 202-586-5955, or by mail at MA-46/Forrestal Building, 1000 Independence Avenue, S.W., Washington, D.C. 20585, for any further assistance and to discuss any aspect of your request. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Please refer to the above-referenced number in any communications with DOE about the request. If you have any questions about the processing of the request or this letter, you may contact me or Ms. Renee Harris of this office at MA-46/Forrestal Building, 1000 Independence Avenue, S.W., Washington, D.C. 20585, or at (202) 287-6733.

I appreciate the opportunity to assist you with this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Alex Morris', with a long, sweeping horizontal stroke extending to the right.

Alexander C. Morris
FOIA Officer
Office of Public Information

EXHIBIT 4

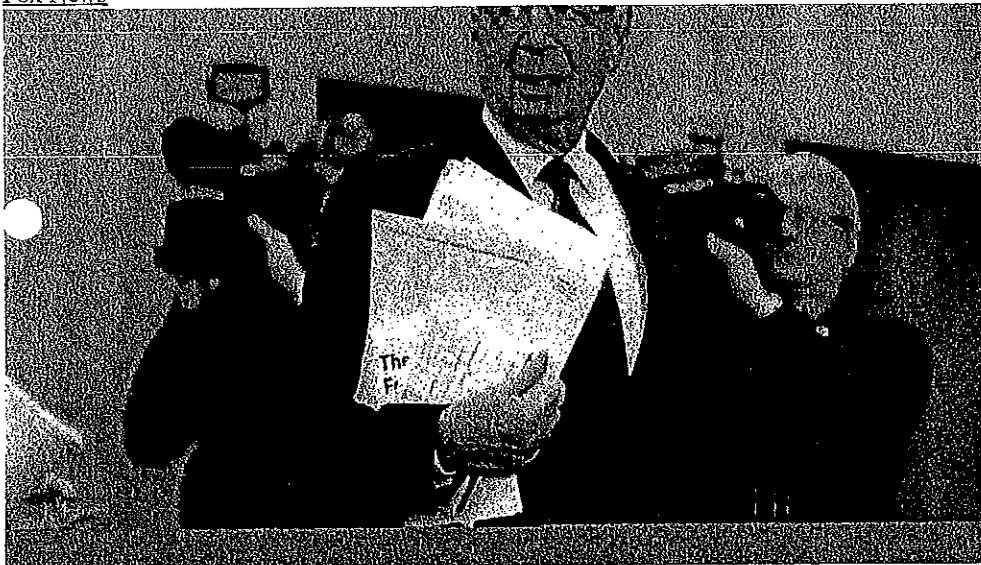


Peter Schweizer: Your money is being used to help bankroll the World Economic Forum in Davos. Why?

By Peter Schweizer, ,

Published January 11, 2017

Fox News



World Economic Forum (WEF) Executive Chairman and founder Klaus Schwab arrives at a news conference in Cologny, near Geneva, Switzerland January 10, 2017. (REUTERS/Pierre Albouy)

Later this month hundreds of private jets are expected to descend on a small town in the canton of Graubünden, Switzerland, for a few brief days.

They will be carrying the elite of the elite, who will be attending the World Economic Forum (WEF).

And in the beautiful Alpine mountain resort of Davos-Klosters, attendance is strictly by invitation only. Basic membership in the WEF costs \$50,000. A premium membership can set you back \$500,000. But in recent years the WEF has enjoyed another source of income. Since 2013, the Obama administration has been sending foreign assistance dollars to the WEF through the United States Agency for International

Development (USAID). According to government records, the tab to taxpayers thus far is \$26 million.

Davos attendees include a global elite, including heads of state, business titans, and celebrities. There are cocktail parties sponsored by multinational corporations and dinners catered by world-class chefs and served by bartenders performing magic tricks.

Celebrities like Leo DiCaprio and Bono mingle with current heads of state and tech billionaires from around the world. Attendance is so tight for the 2017 event the WEF is considering housing staff in "temporary containers" to make room for guests.

This is without a doubt the most connected non-profit on the planet.

The organization boasts that it "provides a platform for the world's 1,000 leading companies to shape a better future."

The globalist missionary zeal of the organization combined with its luxurious parties has earned it the Davos meeting the nickname "Burning Man for Billionaires."

Not surprisingly, the WEF is also flush with cash. According to the non-profit's 2015-2016 annual report, the organization took in \$223 million (current exchange rate) in revenue, most of it from membership dues and partnership fees.

Despite the obvious wealth of the WEF and its members, USAID has given "assistance" to the WEF in the form of tens of millions of dollars of taxpayer money.

Since 2013, USAID has given the World Economic Forum \$26,091,370 under its Foreign Assistance to Programs Overseas initiative, which comprises nearly two-thirds of all grant and other funding WEF took in over that time period.

So why is USAID, which is supposed to focus on disaster relief and poverty relief, subsidizing such an organization?

According to the federal government's spending website usaspending.gov, it's unclear. The money came in sizeable grants of \$9.5 million in 2013, \$11.1 million in 2015, and \$5.7 million in 2016.

The taxpayer money began to flow the same year USAID administrators began attending the luxurious confab. USAID administrators Rajiv Shah (2011-15) or Gayle Smith (2016) have attended every Davos meeting since 2011.

In 2013, USAID changed its mission statement to make its prime goals to "end extreme poverty and promote resilient, democratic societies." Well, Switzerland is a "resilient democratic society." They got that part right.

According to government contract reports, it's unclear if taxpayer funds were taken by the WEF and sent to Africa or Asia, but it doesn't seem so.

The "principal place of performance" of these grants was Switzerland, with the "recipient" city of Cologne, where the WEF has its headquarters. Not surprisingly, a search of online real estate records reveals the town has a substantial luxury real estate market.

USAID official, when asked to comment, said this:

"The United States Agency for International Development (USAID) works with public and private partners

to advance America's security and prosperity by promoting resilient, democratic societies and ending extreme poverty. USAID has awarded grants to the World Economic Forum (WEF), including an innovative public-private partnership to spur economic growth and reduce poverty by reducing the time and costs to trade in developing countries. USAID remains committed to stringently vetting, tracking and evaluating the results of awarded grants, to include those disbursed to the WEF, and to its public and private sector partners."

How the global elite choose to spend their time is their business, but U.S. taxpayers should not be subsidizing their social lives.

The 47th annual World Economic Forum convenes on January 17th and the theme is "responsive and responsible leadership."

In keeping with that idea, the responsible thing for the incoming Trump administration to do would be to halt grants and funding of this elite organization with taxpayer dollars.

Peter Schweizer is the president of the Government Accountability Institute and the author of Clinton Cash (Harper Collins 2015).

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Opinions

The swamp is deep, and here are five bipartisan ways to drain it

By Norman Eisen and
Peter Schweitzer
December 13, 2016

Norman Eisen, a visiting fellow at the Brookings Institution, co-founded and chairs Citizens for Responsibility and Ethics in Washington. Peter Schweitzer is president of Government Accountability Institute.

As founders of two leading government watchdog groups that come from very different perspectives, Citizens for Responsibility and Ethics in Washington and the Government Accountability Institute, we welcome President-elect Donald Trump's commitment to "drain the swamp." We here offer, in our personal capacities, five joint recommendations that the president-elect should pursue to implement that critically important campaign promise:

1. Registered lobbyists. The president-elect has made a good start by ejecting corporate lobbyists from his transition and by committing to ban former members of his administration from registered federal and state lobbying for five years after leaving government service. In addition, the new administration should look to slow the "reverse revolving door," setting up rules regulating the financial conflicts of lobbyists who enter his administration. President Obama established a set of rules to address this issue. After all, when special-interest influencers enter government, they get their hands directly on the wheels of power that they were formerly trying to affect from outside.

2. Shadow lobbyists. Of course, it is not only registered lobbyists

who have financial conflicts of interest. Because of the notoriously porous Lobbying Disclosure Act, many in Washington engage in lobbying activity without having to register. Too much influence is still exerted in these shadows, as the president-elect correctly recognized when he vowed to close lobbying registration loopholes. The best way for him to accomplish this is to address all those who bring financial conflicts of interest with them into his administration, not only lobbyists. Why not go one step beyond the Obama order, which had separate rules for lobbyists and non-lobbyists, by offering a single tough set of financial-conflicts rules that applies to *all* appointees? This would lift up Obama's lobbying rules to also apply to "public relations consultants" and the like, including those who hire them. We support a draft executive order offered by a bipartisan group of experts that would do that as a starting point for the president-elect's review. The beauty of this approach is that the new president can begin addressing lobbying loopholes with the stroke of his pen for executive-branch appointees while he seeks revisions to the lobbying statute in Congress.

3. Transparency. High ethics standards are important, but they must be complemented by transparency for government to work well. Indeed, this is one of the strongest areas of agreement among the left, right and center of the political spectrum. To drain the swamp, Trump should make a strong commitment to transparency — among other things, by continuing the policy of posting White House visitor records on the Internet, and even expanding this disclosure to other agencies. This year Congress passed, on a bipartisan basis, a Freedom of Information Act upgrade that we hope the new administration will vigorously enforce. And the president-elect should, above all, get off on the right foot by releasing his tax returns, as we have both previously called upon him to do.

4. Campaign finance. Campaign cash is the bilge that waters the D.C. swamp. The problem of unregulated, undisclosed donations is one on which a supermajority of the American public agrees. The danger of big money in politics extends beyond campaigns and includes fundraising for inaugural events as well. Candidate Trump was correct to condemn the corrupting influence of donor dollars on our system. There is a variety of proposed solutions on the right and left, and though there is some room for honest disagreement, there is more consensus than one might think. Why not appoint an independent, bipartisan Simpson-Bowles type of commission to come up with recommendations?

5. Tone at the top. The president-elect has made a good first step with his announcement on Twitter that he will “be leaving” his business “in total” and will be taking himself “completely out of business operations.” We both believe he should do that by transferring all his business interests to a blind trust or the equivalent. While he is correct that the general conflict-of-interest statute 18 U.S. Code 208 does not apply specifically to him, creating such a trust or taking similar steps, as every president for the past four decades has done, will set an important tone of integrity at the top for everyone in his administration as they address their own ethics and conflicts issues.

On Jan. 20, Trump will be the president of all Americans. Although we do not agree with each other — or, indeed, with the president-elect — on all of his policies, we hope he will succeed in his pledge to fight special-interest influence. The swamp is deep, and draining it is an essential task.

Read more:

Tim Cruz and Ron DeSantis: If Republicans really want to drain the swamp, here’s how to do it

Richard Painter and Norman Eisen: A Trump presidency would be ethically compromised


Gene Robinson: Trump isn't draining the swamp. He's deepening it.

Dana Milbank: Stick a sterling silver fork in Trump's 'populism'

Jennifer Rubin: Who is going to drain Trump's swamp?

 93 Comments

Norman Eisen

Norman Eisen served as White House "ethics czar" and U.S. ambassador to the Czech Republic and is the author of "The Last Palace: Europe's Turbulent Century in Five Lives and One Legendary House." Follow 

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OPINION

Column: Campaign-finance tweaks can fix big problems

Peter Schweizer Published 6:14 p.m. ET Nov. 27, 2012 Updated 6:24 p.m. ET Nov. 27, 2012

More disclosure is smart, bipartisan step.



(Photo: Doug Pensinger, Getty Images)

America just witnessed the most expensive federal election in our history. An estimated \$6 billion was spent on the political circus. Now that partisan tempers have cooled, it is time to face the fact that lax disclosure requirements, antiquated Federal Election Commission (FEC) laws and aggressive online campaign fundraising have endangered the U.S. election system.

At the core of the problem is a lack of transparency. Take, for example, the rising importance of "bundlers", individuals who collect numerous donations for a candidate. The FEC does not require campaigns to disclose the names of bundlers unless they are registered lobbyists. President Obama voluntarily disclosed (<http://abcnews.go.com/blogs/politics/2012/10/president-obamas-bundlers-include-former-republican-florida-gov-charlie-crist-gwen-stefani/>) his bundlers, but Mitt Romney did not. That's a problem because bundlers who bag big bucks for candidates are more likely to receive dubious favors, such as government grants, loans or lucrative contracts. While requiring candidates to disclose bundlers wouldn't end cronyism, it would at least allow us to identify it.

A bygone era

Another weakness of the way we finance campaigns is the "pass the hat" rule, which allows candidates to avoid reporting donations totaling less than \$200 in an election cycle. The rule gets its name from the bygone era when politicians literally passed a hat. Today, with campaigns hauling in hundreds of millions of dollars in small internet donations, the rule doesn't make sense.

Using something called "robo-donors," fraudsters can generate thousands of small donations to evade the rules. Many campaigns exacerbate the problem by intentionally maximizing such donations. For example, when a British citizen (http://www.nypost.com/p/news/national/bam_blind_eye_to_illegal_donors_8SWotyt1RvohyDCBvyrEL) wanted to test the Obama campaign's online donation system to see whether it allowed him to donate — illegal under U.S. law — not only did the Obama campaign accept his \$10 contribution, it sent him follow-up e-mails requesting a \$188 donation, keeping his donations to \$198, just under the \$200 disclosure threshold.

Credit card security

America's campaign-finance system is especially vulnerable to illegal foreign donations for another reason: The FEC has no minimum security standards for online fundraising. For example, even though 90% of the top e-commerce websites require individuals to enter their three- or four-digit credit card security number (known as the CVV) before making a transaction, a recent study by the Government Accountability Institute found that 47% of the campaign websites for members of Congress do not. Neither did Obama's. The extra step can block foreign donations.

The threat of foreign influence is hardly new. In 1972, President Nixon's campaign allegedly received millions from the shah of Iran, Arab interests and a French businessman. In 1980, the Philippine president reportedly hatched a plan to funnel funds into the election. In the 1990s, the Chinese government and an Indonesian family gave hundreds of thousands to President Clinton, a process that could be masked and turbo-charged by the Internet.

Many issues divide Americans, but keeping illegal campaign money out of elections isn't one. So why not begin to fix the problem with some simple solutions? Require disclosure of bundlers, report donations under \$200 and improve security for online credit card donations. Doing those things would be a smart step in the right direction.

Peter Schweitzer is president of the Government Accountability Institute and a fellow at the Hoover Institution.

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EXHIBIT 5

Confirmed	Website	Date	Time	Type	Publication/TV Radio	Reporter/Interviewer	Topic	Link
x	Website	4/21/19		Article	Breitbart	Robert Kyrlelix	Leads Gohmert on 'Mallory': 'This is Not a Good Man'	https://www.breitbart.com/4/21/2019/leads-gohmert-on-mallory-this-is-not-a-good-man/
x	Website	4/12/19		Article	Breitbart	Breitbart News	Peter Schweizer's 'Secret Empire' Named Top 5 Best 'Political Corruption' Books of All Time	https://www.breitbart.com/4/12/2019/peter-schweizer-secret-empire-5-best-political-corruption-books-of-all-time/
x	Website	4/11/19		Opinion	Fox News	David N. Bosche	David Hunter: 'The media need to investigate Joe Biden and his Ukraine dealings'	https://www.foxnews.com/opinion/david-bosche-the-media-need-to-investigate-joe-biden-and-his-ukraine-dealings
x	Website	4/10/19	4:45 PM	Article	The Daily Caller	J. Arthur Bloom	Why These Two Democratic Candidates Have Been Involved in Bulldozing Flowers	https://dailycaller.com/2019/04/10/why-two-democratic-candidates-have-been-involved-in-bulldozing-flowers/
x	Website	4/7/19		Article	Breitbart	Robert Kyrlelix	Peter Schweizer on Gohmert: 'They 'Pret' Of Certain Conservatives' with 'Domination'	https://www.breitbart.com/4/7/2019/peter-schweizer-on-gohmert-they-pret-of-certain-conservatives-with-domination/
x	Website	4/7/19	12:01 AM	Article	The Times	Josh Gancy	Ukraine deal fuels trouble for 'Creepy Joe' Biden's son, Hunter	https://www.thetimes.com/us/politics/ukraine-deal-fuels-trouble-for-creepy-joe-biden-s-son-hunter-creepy-joe-silk-1k2b
x	YouTube	4/4/19		Radio Interview	The Blaze	Clifford Beck	Peter Schweizer: Joe Biden is the most corrupt vice president of our lifetime	https://www.youtube.com/watch?v=PVKNXX132Xc
x	Website	4/4/19		Article	Breitbart	Charlie Spiering	Team Trump Blasts 'Cranked Joe' Biden After Schweizer Corruption Report	https://www.breitbart.com/politics/2019/04/04/team-trump-blasts-cranked-joe-biden-after-schweizer-corruption-report/
x	Website	4/2/19		Article	Breitbart	Robert Kyrlelix	Exclusive — Peter Schweizer: Joe Biden 'Steered \$1.3 Billion' to Ukraine While His Son Bagged 'Sweetheart Deal' from Their Government	https://www.breitbart.com/politics/2019/04/02/exclusive-peter-schweizer-joe-biden-steered-1-3-billion-to-ukraine-while-his-son-bagged-sweetheart-deal-from-their-government/
x	GAI Website - Pg. 1	4/6/19	6:00 PM	Article	Book Authority	Recommended by Geoff De Vries	37 Best Political Corruption Books of All Time	https://books1.barnesandnoble.com/?i=ref&pg=PA5&as_ssr_search=corruption&as_ssr_filters=author%3A%22Geoff+De+Vries%22&as_ssr_sort=bestselling
x	GAI Website - Pg. 1	4/6/19	6:00 PM	Article	The Times	Josh Gancy	Son's sweet 'Ukraine deal' fuels trouble for 'Creepy Joe'	https://www.thetimes.com/us/politics/son-s-sweet-ukraine-deal-fuels-trouble-for-creepy-joe-1k2b
x	GAI Website - Pg. 1	3/25/19		Article	KayCast	Gabriel Hardy-Francis	Biden contacts with Burisma reopens as issue in mid 2020 presidential bid	https://www.kaycast.com/2019/03/25/biden-contacts-with-burisma-reopens-as-issue-in-mid-2020-presidential-bid/
x	GAI Website - Pg. 1	3/22/19		Article	Breitbart	Trent Babor	Schweizer: China Buying Off Biden Through Son	https://www.breitbart.com/3/22/2019/schweizer-china-buying-off-biden-through-son/
x	GAI Website - Pg. 1	12/13/18		Article	RealClearInvestigations	Eric Rogers	Bolton 'Finds, American-Side ... and Its Silver Heavens Exclusive: New GAI Report on BSI Program's link to terrorism, fraud	https://www.realclearinvestigations.com/articles/2018/12/13/bolton-finds-american-side-and-its-silver-heavens-exclusive-new-gai-report-on-bsi-program-s-link-to-terrorism-fraud.html
x	GAI Website - Pg. 1	10/23/18		Report	Gov't Accountability Institute	Gov't Accountability Institute	Could find on an August 8th file it said on GAI's website but on August 23rd shown below. Will come back and dig some more.	https://www.gaiweb.org/pdfs/2018/10/23/18_GAI_SNAP_RAID_TERROR.pdf
x	GAI Website - Pg. 1	8/8/18						
x	GAI Website - Pg. 1	8/23/18		TV Interview		Sean Hannity with Seamus Burnett and Peter	Sean Hannity, Peter Schweizer and Seamus Burnett Discuss Bombshell New Book CONPROLISED	https://www.youtube.com/watch?v=pb8BnDCC4
x	GAI Website - Pg. 1	8/19/18		Article	Breitbart	Robert Kyrlelix	Schweizer: Security Clearance 'Affairs' Brennan's and Clapper's 'Bolton Live in a Big Fly'	https://www.breitbart.com/8/19/2018/schweizer-security-clearance-affairs-brennans-and-clappers-bolton-live-in-a-big-fly/
x	GAI Website - Pg. 1	8/19/18	10:48 AM	TV Interview	Fox News	Lou Dobbs with Eric Rogers	Watch Eric Rogers discusses GAI findings on Peter Fraud	https://www.youtube.com/watch?v=QK0NP1NYS8k&feature=youtu.be
x	GAI Website - Pg. 1	7/23/18	3:28 PM	Article	NBC Think Opinion, Analysis, Essays	Adam Noe and Meredith McQuade	Son's sweet Ukraine deal fuels trouble for 'Creepy Joe'	https://www.thinkinsider.com/watch?v=2Hem7ZdA&feature=youtu.be
x	GAI Website - Pg. 1	6/11/18		TV mention	Fox News	Steve Hilton	GAI Report Featured on Steve Hilton's Swamp Watch segment	https://www.youtube.com/watch?v=2Hem7ZdA&feature=youtu.be
x	GAI Website - Pg. 1	6/10/18	3:38 PM	Report	Gov't Accountability Institute		GAI Exclusive Report: Commerce Secretary Wilbur Ross Conflicts of Interest	https://s3.amazonaws.com/gaiweb.org/pdfs/2018/06/10/18_GAI_WilburRoss.pdf
x	GAI Website - Pg. 2	5/6/18	6:00 PM	Article	Politico	Tyngs Snyder	Did Elaine Chao's DOT interviews help her family's business?	https://www.politico.com/story/2018/05/06/elaine-chao-dot-interview-james-transportation-department-559685
x	GAI Website - Pg. 2	4/8/18		List	The New York Times Best Seller's List	NYT	Peter Schweizer's 'Secret Empire' debuts at #1 on NY Times Best Sellers list	https://www.nytimes.com/politics/first-reads/peter-schweizer-secret-empire-1st-on-nation-s-best-sellers-list/
x	GAI Website - Pg. 2	3/21/19		Editorial	Investor's Business Daily	None listed	Think Obama Administration Won't Corrupt? Think Again	https://www.youtube.com/watch?v=BN1D3g-B

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Confirmation	Website	Date	Time	Type	Publisher/TV/Studio	Reporter/Interviewer	Title	URL
x	GAI Website - Pg. 11	5/14/15	12:34 PM	Article	Hollywood Reporter	Hilary Lewis	George Staphenopoulos Brags Out of GOP Debate After Failing to Discredit Clinton Foundation Donations	https://www.hollywoodreporter.com/george-staphenopoulos-brags-gop-debate-123456789
x	GAI Website - Pg. 11	5/14/15	9:17 AM	Article	Politico	Dylan Byers	George Staphenopoulos discredits \$75,000 contribution to Clinton Foundation	https://www.politico.com/story/2015/05/george-staphenopoulos-discredits-75-000-contribution-to-clinton-foundation-2017120
x	GAI Website - Pg. 11	5/14/15		Article	The Washington Post	Erin Wemple	George Staphenopoulos' donations to Clinton Foundation: Immediate crisis for ABC News	https://www.washingtonpost.com/insights/wemple/wp/2015/05/14/george-staphenopoulos-donations-to-clinton-foundation-immediate-crisis-for-abc-news/?hpid=hp_hp-top-table-main-clinton-foundation%3Ahomepage%2Ftcm-44650056017
x	GAI Website - Pg. 11	5/14/15	3:10 PM	Article	MEDLINE	Joe Canella	ABC Must Breathe Staphenopoulos on Sunday Mornings for Failure to Discredit Clinton Donation	https://www.medscape.com/viewarticle/abc-must-breathe-staphenopoulos-on-sunday-mornings-for-failure-to-discredit-clinton-donation-1360160
x	GAI Website - Pg. 12	5/14/15		Article	The Washington Post	Erin Wemple	George Staphenopoulos' donations to Clinton Foundation: Immediate crisis for ABC News	https://www.washingtonpost.com/insights/wemple/wp/2015/05/14/george-staphenopoulos-donations-to-clinton-foundation-immediate-crisis-for-abc-news/?hpid=hp_hp-top-table-main-clinton-foundation%3Ahomepage%2Ftcm-44650056017
x	GAI Website - Pg. 12	5/10/15		Opinion	Wall Street Journal	Mary Anastasiou O'Grady	How the Clintons Worked the Angles in Haiti	https://www.wsj.com/articles/how-the-clintons-worked-the-angles-in-haiti-1431380232
x	GAI Website - Pg. 12	5/10/15		Opinion	Gov't Accountability Institute		How Hillary Clinton Transferred U.S. Uranium to the Russian Government	https://www.scribd.com/document/2501608/Report-Shokhov-08012016-2-6.pdf
x	GAI Website - Pg. 12	5/21/15		Report	Gov't Accountability Institute		Clinton Cash: Julian Stans Staphenopoulos, ABC News for Massive Breach of Ethical Standards	https://www.bloomberg.com/news/articles/2015-05-14-clinton-cash-author-stans-staphenopoulos-abc-news-for-massive-breach-of-ethical-standards
x	GAI Website - Pg. 12	5/14/15	12:36 PM	Article	Bloomberg	Joshua Green	Clinton Cash: Julian Stans Staphenopoulos, ABC News for Massive Breach of Ethical Standards	https://www.bloomberg.com/news/articles/2015-05-14-clinton-cash-author-stans-staphenopoulos-abc-news-for-massive-breach-of-ethical-standards
x	GAI Website - Pg. 12	5/10/15		Article	New York Times	Steve Eder	Tony Rodman's Text Invite Scrutiny for Hillary and Bill Clinton	https://www.nytimes.com/2015/05/14/us/politics/tony-rodman-text-invite-scrutiny-for-hillary-and-bill-clinton.html
x	GAI Website - Pg. 12	5/11/15		Article	Forbes	Nomi Prins	Why Clinton Cash Has Bipartisan And National Importance	https://www.forbes.com/sites/nomi/prins/2015/05/11/why-clinton-cash-has-bipartisan-and-national-importance/#2e1835531d44
x	GAI Website - Pg. 12	5/10/15		Article	New York Intelligence	Gabriel Sherman	The Clinton Foundation's Behind-the-Scenes Battle With a Charity Watchdog Group	http://nyint.org.com/articles/george-staphenopoulos-clinton-cash-on-edges-about-her-memoiristhesis
x	GAI Website - Pg. 12	5/15/15		Article	CNN Politics	Jeff Zeleny	Clinton cash on edges about her memoiristhesis	http://www.cnn.com/2015/05/05/politics/hillary-clinton-cash-jeff-zeleny/
x	GAI Website - Pg. 12	5/4/15	12:44 PM	Article	New York Times	Maggie Haberman	Bill Clinton Says Foundation Did Nothing 'Knowingly'	http://nyint.org.com/articles/george-staphenopoulos-clinton-cash-on-edges-about-her-memoiristhesis
x	GAI Website - Pg. 12	5/18/15		Article	Wall Street Journal	Jeffrey Sachs	Jeffrey Sachs on CLINTON CASH: There is A Lot Here	http://www.wsj.com/articles/how-the-clintons-kept-away-with-it-1431032394
x	GAI Website - Pg. 13	5/17/15		Article	Wall Street Journal	Regey Hognan	How the Clintons Got Away With It	http://www.wsj.com/articles/how-the-clintons-kept-away-with-it-1431032394
x	GAI Website - Pg. 13	5/6/15	6:53 PM	Article	Wall Street Journal	James Freeman	There's A Money to Be Made	https://www.wsj.com/articles/how-the-clintons-kept-away-with-it-1431032394
x	GAI Website - Pg. 13	5/6/15		Article	The Washington Post	Janet Rubin	How much damage has Hillary Clinton inflicted on herself?	https://www.washingtonpost.com/news/insights/wp/2015/05/06/how-much-damage-has-hillary-clinton-inflicted-on-herself/?hpid=hp_hp-top-table-main-clinton-cash%3Ahomepage%2Ftcm-44650056017
x	GAI Website - Pg. 13	5/17/15		Article	Wall Street Journal	James Freeman	PS: There's A Money to Be Made - CLINTON CASH Book Review	https://www.wsj.com/articles/how-the-clintons-kept-away-with-it-1431032394
x	GAI Website - Pg. 13	5/6/15		Article	Medium.com	Peter Schweizer	Clinton Cash: Author Responds to Hillary Clinton's New York Lamented Attack Appraisal	https://www.youtube.com/watch?v=60xwRKLw
x	GAI Website - Pg. 13	5/6/15		Article	Medium.com	Peter Schweizer	Clinton Cash: Author Responds to Hillary Clinton's New York Lamented Attack Appraisal	https://medium.com/@peterschweizer/GAUCid-ahet-clinton-cash-48b1133f9d66
x	GAI Website - Pg. 13	5/6/2015		TV mention	MSNBC	Manning Joe	Manning Joe says Clinton Cash controversy way bigger than Did She or Didn't She?	https://www.washingtonpost.com/politics/how-the-clintons-a-luxury-jet-and-their-1-00-million-donor/2015/05/03/6838010d-0acc-11e4-bb6c-d6a31bnd79d4_story.html?hpid=hp_hp-top-table-main-clinton-cash%3Ahomepage%2Ftcm-44650056017
x	GAI Website - Pg. 13	5/17/15		Article	Medium.com	Peter Schweizer	The Clintons, a luxury jet and their \$1.00 million donor from Canada	https://www.washingtonpost.com/politics/how-the-clintons-a-luxury-jet-and-their-1-00-million-donor/2015/05/03/6838010d-0acc-11e4-bb6c-d6a31bnd79d4_story.html?hpid=hp_hp-top-table-main-clinton-cash%3Ahomepage%2Ftcm-44650056017
x	GAI Website - Pg. 13	5/13/15		Article	The Washington Post	Ann Nery-Jarvis	Author: Clinton Foundation Discredits Shoppo At The Pay	https://www.washingtonpost.com/news/insights/wp/2015/05/02/hillarys-money-woes
x	GAI Website - Pg. 13	5/21/15		Article	NPR	Bloomberg News	NP's Scott Simon talks with Joshua Green of Least	https://www.washingtonpost.com/news/insights/wp/2015/05/02/hillarys-money-woes
x	GAI Website - Pg. 14	5/21/15		Article	The Economist		Clinton's money woes	https://www.economist.com/articles/2015/05/02/hillarys-money-woes
x	GAI Website - Pg. 14	5/21/15		Article	The Washington Post	Daniel Bassett	Clinton's money woes	https://www.washingtonpost.com/news/insights/wp/2015/05/02/hillarys-money-woes
x	GAI Website - Pg. 14	4/30/15	3:28 PM	Article	The Washington Post	Daniel Bassett	Clinton's money woes	https://www.washingtonpost.com/news/insights/wp/2015/05/02/hillarys-money-woes
x	GAI Website - Pg. 14	5/21/15		Article	Gov't Accountability Institute		Clinton's money woes	https://www.washingtonpost.com/news/insights/wp/2015/05/02/hillarys-money-woes
x	GAI Website - Pg. 14	4/29/15	10:23 AM	Article	The Daily Caller	Chuck Ross	Clinton's money woes	https://www.dailycaller.com/2015/04/29/hillary-clinton-cash-jeffrey-sachs/
x	GAI Website - Pg. 14	4/27/15	7:25 PM	Opinion	Wall Street Journal	Bad Stephens	Clinton's money woes	https://www.wsj.com/articles/hillary-clinton-cash-jeffrey-sachs-1430177134
x	GAI Website - Pg. 14	4/26/15		Article	Brinkster	Barthel News	Clinton's money woes	https://www.brinkster.com/politics/2015/04/26/11-explosive-clinton-cash-facts-memoiristhesis-1430177134
x	GAI Website - Pg. 14	4/27/15	5:15 PM	Article	The Daily Beast	Elisavete Cila	Clinton's money woes	https://www.thedailybeast.com/articles/archives/2015/04/27/clinton-cash-facts-memoiristhesis-1430177134
x	GAI Website - Pg. 14	4/23/15		Editorial	New York Times	The Editorial Board	Clinton's money woes	https://www.nytimes.com/2015/04/24/opinion/clinton-and-the-foundation.html
x	GAI Website - Pg. 14	4/23/15	7:21 PM	Opinion	Wall Street Journal		Clinton's money woes	https://www.wsj.com/articles/george-staphenopoulos-brags-gop-debate-1429812389

Confirmed	Website	Date	Time	Type	Publication / TV Station	Reporter / Interviewer	Title	Link
x	GAI Website - Pg. 14	4/22/15	10:08 PM	Article	Wall Street Journal	James V. Grunwald, Rebecca Ballhaus, and Peter Nicholas	Gifts to Hillary Clinton's Family Charity Are Sanitized in Wake of Book	https://www.wsj.com/articles/gifts-to-hillary-clinton-family-charity-are-sanitized-in-wake-of-book-142974883
x	GAI Website - Pg. 15	4/23/15		Article	New York Times	Jo Becker and Mike McIntire	Cash Flowed to Clinton Foundation Amid Russian Uranium Deal	https://www.nytimes.com/2015/04/23/us/politics/cash-flowed-to-clinton-foundation-as-uranium-deal-is-unleashed-while-clinton-family-charity-is-sanitized.html
x	GAI Website - Pg. 15	4/22/15		Article	The Washington Post	Rosalind S. Helerman	For Clintons, speech means shows how their wealth is intertwined with charity	https://www.washingtonpost.com/politics/for-clintons-speech-means-shows-how-their-wealth-is-intertwined-with-charity/2015/04/22/1727096d-d68e-11e4-b500-1c5b1d8106_story.html?hpid=hp_hp-top-table-main-clinton-book%3Ahomepage%2Fstory&hpid=hp_hp-top-table-main-clinton-book%3Ahomepage%2Fstory
x	GAI Website - Pg. 15	4/21/15		Article	Politico	Jack Shafer	Hillary Clinton Can't Run for President!	https://www.politico.com/interactive/2015/04/hillary-clinton-cant-run-for-president-117209
x	GAI Website - Pg. 15	4/6/15		TV mention	MSNBC	Rachel Maddow Show	New Book, Clinton Cash, 'Questions Foreign Donations to Foundation'	https://www.youtube.com/watch?v=8VtL4Q8c
x	GAI Website - Pg. 15	4/19/15		Article	New York Times	Jay Bybee	Clinton Cash: Questions Foreign Donations to Foundation	https://www.nytimes.com/2015/04/19/us/politics/new-book-clinton-cash-questions-foreign-donations-to-foundation.html
x	GAI Website - Pg. 15	4/21/15		TV mention	CNN	Carol Costello	CNN Reporters Discuss Clinton Cash	https://www.youtube.com/watch?v=8VtL4Q8c
x	GAI Website - Pg. 15	4/20/15		Article	BBC News	Anthony Zurcher	Will a 'leaked' book damage Hillary's presidential hopes?	https://www.bbc.com/news/world-us-canada-32358268
x	GAI Website - Pg. 15	4/21/15		Article	HuffPost	Sam Stein and Michael Calderone	Clinton Campaign: Guess Up To Cash Another Book	https://www.huffpost.com/news/article/2015-04-20/pulling-bill-clinton-s-questions-into-the-postscriptive
x	GAI Website - Pg. 15	4/20/15		Article	Bloomberg	Ash John	Pulling Bill Clinton's Spoofing Fear Into Perspective	https://www.bloomberg.com/news/articles/2015-04-20/pulling-bill-clinton-s-questions-into-the-postscriptive
x	GAI Website - Pg. 15	4/20/15	10:52 AM	Article	CNBC	Ben White	Can Hillary turn the page on controversial new book?	https://www.cnbc.com/2015/04/20/can-hillary-turn-the-page-on-controversial-new-book.html
x	GAI Website - Pg. 16	4/20/15		Article	New York Intelligence	Margaret Hartmann	New Book Will Openly Make People Care About Shady Clinton Donations	https://www.nytimes.com/2015/04/20/us/politics/new-book-will-openly-make-people-care-about-shady-clinton-donations.html
x	GAI Website - Pg. 16	4/20/15	1:39 PM	Article	Daily Mail UK	Kieran Concom	The book's full title could reveal Hillary's campaign: Foreign donors to her foundation 'were rewarded through U.S. policy while she was Secretary of State'	http://www.dailymail.co.uk/news/article-3046590/The-book-s-full-title-could-reveal-Hillary-s-campaign-Foreign-donors-to-her-foundation-were-rewarded-through-U-S-policy-Secretary-State.html#ixzz3YX2Ggms
x	GAI Website - Pg. 16	4/20/15		Article	The Atlantic	David A. Graham	Q: How the media should report on 'Clinton Cash'	https://www.theatlantic.com/politics/archive/2015/04/20/how-the-media-should-report-on-clinton-cash/399137
x	GAI Website - Pg. 16	4/20/15		Article	The Washington Post	Curtis Chitza	Q: How the media should report on 'Clinton Cash'	https://www.washingtonpost.com/news/insider/wp/2015/04/20/clinton-cash-qa-answers-the-media-should-report-on-clinton-cash/?hpid=hp_hp-top-table-main-clinton-book%3Ahomepage%2Fstory&hpid=hp_hp-top-table-main-clinton-book%3Ahomepage%2Fstory
x	GAI Website - Pg. 16	4/4/15		Article	CNN	Bill O'Reilly with Peter Schweizer	CNN's Erin Burnett Reports on Hillary Clinton Dodging Questions Regarding Peter Schweizer's New Book	https://www.cnn.com/2015/04/04/politics/bill-o-reilly-erin-burnett-hillary-clinton-dodges-questions-clinton-cash-book/index.html
x	GAI Website - Pg. 16	4/20/15		TV mention	ABC News	Blumhert Titus	Bill O'Reilly Discusses CLINTON CASH by Peter Schweizer	https://www.youtube.com/watch?v=8VtL4Q8c
x	GAI Website - Pg. 16	4/20/15	8:01 AM	Article	Bloomberg	Blumhert Titus	Hillary Clinton Dodges Question About Clinton Cash Book	https://www.bloomberg.com/news/articles/2015-04-20/book-and-do-documentary-dodges-questions-for-clinton-donors
x	GAI Website - Pg. 16	4/4/15		Article	Govt Accountability Institute	Kerrio Sullivan and Rosalind S. Helerman	Book Sold to Document Government Favors for Clinton Donors	https://www.gai.org.uk/news/2015/04/04/hillary-clinton-cash-book-sold-to-document-government-favors-for-clinton-donors
x	GAI Website - Pg. 17	3/20/15		Article	The Washington Post	Kerrio Sullivan and Rosalind S. Helerman	Order Your Copy of GAI's new book CLINTON CASH Now!	https://www.washingtonpost.com/news/insider/wp/2015/04/04/clinton-cash-book-order-your-copy-now/
x	GAI Website - Pg. 17	3/20/15		Article	The Washington Post	Kerrio Sullivan and Rosalind S. Helerman	Role of Hillary Clinton's brother in Haiti gold mine raises eyebrows	https://www.washingtonpost.com/news/insider/wp/2015/04/04/clinton-cash-book-order-your-copy-now/
x	GAI Website - Pg. 17	3/20/15		Article	The Washington Post	Kerrio Sullivan and Rosalind S. Helerman	How the Clintons' Haiti development plans succeed — and disappoint	https://www.washingtonpost.com/news/insider/wp/2015/04/04/clinton-cash-book-order-your-copy-now/
x	GAI Website - Pg. 17	4/20/15		Article	The Washington Post	Kerrio Sullivan and Rosalind S. Helerman	Book alleges inside cash swayed Hillary's nuclear stance	https://www.washingtonpost.com/news/insider/wp/2015/04/20/clinton-cash-book-order-your-copy-now/
x	GAI Website - Pg. 17	3/5/15		Press Release	Hager-Colliers	Gratias Deceitful	CLINTON CASH: INSIDERS REVEALS PUBLICATION OF PETER SCHWEIZER'S EXPOSURE CLINTON EXPOSE	https://www.hagercolliers.com/press-releases/2015/03/05/clinton-cash-book-order-your-copy-now/
x	GAI Website - Pg. 17	3/6/15		Article	Daily Mail UK	David Marroso	Hillary Clinton's brother's nuclear reactor gold-mining permit in Haiti after Bill Clinton helped country recover from earthquake devastation	https://www.dailymail.co.uk/news/article-3046590/Hillary-Clinton-s-brother-s-nuclear-reactor-gold-mining-permit-in-Haiti-after-Bill-Clinton-helped-country-recover-from-earthquake-devastation.html
x	GAI Website - Pg. 17	9/9/14		Report	Govt Accountability Institute		Report Update: Presidential Daily Briefings: A Time-based Analysis	https://www.gai.org.uk/news/2014/09/09/gai-report-on-daily-briefings
x	GAI Website - Pg. 17	9/30/14		Article	Daily Mail UK	David Marroso	Obama has abided more than HALF of his daily intel briefings — as spies hit back after he blamed them for underestimating ISIS	https://www.dailymail.co.uk/news/article-2715947/Report-White-House-intelligence-govt-Obama-abiding-POR-says-daily-briefings.html
x	GAI Website - Pg. 17	9/30/14		Article	Reason.com	J.D. Tuccille	It's Hard to Keep Up With ISIS When the President Plays Hooky From Intelligence Briefings	http://reason.com/liberty/2014/09/30/its-hard-to-keep-up-with-isis-when-the-president-plays-hooky-from-intelligence-briefings/
x	GAI Website - Pg. 17	9/9/14		Article	Washington Examiner	Neil Munro	Let's Hear What Obama's Daily Briefings Really Sound Like	https://dailyexaminer.com/2014/09/09/obamas-daily-briefings-what-they-really-sound-like/
x	GAI Website - Pg. 17	9/30/14	11:55 AM	Article	The Daily Caller	Neil Munro	OBAMA HAS SPENT MORE TIME PLAYING GOLF THAN IN INTELLIGENCE BRIEFINGS	https://thedailycaller.com/2014/09/30/obama-has-spent-more-time-playing-golf-than-in-intelligence-briefings/

Continued	Website	Date	Time	Type	Publication/TV/Radio	Reporter/Interviewer	Title	Link
x	GAI Website - Pg. 18	9/30/14		TV mention	Fox and Friends	Unannounced	State Department Responses to GAI Report on Fox and Friends	https://www.youtube.com/watch?v=9wD5K9V9Z2g
x	GAI Website - Pg. 18	9/30/14		TV mention	Fox News	Rust Limbaugh	GAI Report on P203 Discussed on "Unannounced"	https://www.youtube.com/watch?v=a3h1K2wvG2A
x	GAI Website - Pg. 18	9/30/14		Radio Mention	The Rush Limbaugh Program	Rust Limbaugh	Obama's ISIS Intel Chatter	https://www.rushlimbaugh.com/daily/2014/09/30/obamas_isis_intel_chatter/?utm_source=feedburner&utm_medium=feed
x	GAI Website - Pg. 18	9/30/14		Article	Townhall (link says "The Hollywood Reporter")	Katie Parrish	Good News: Obama Signs the Majority of His Intelligence Briefings	https://townhall.com/columnists/katieparrish/2014/09/30/good-news-obama-signs-the-majority-of-his-intelligence-briefings-1989597
x	GAI Website - Pg. 18	7/10/14	7:08 PM	Opinion	USA Today	The Editorial Board	Congress backpedals on ethics: Our view	https://www.usatoday.com/story/opinion/2014/07/10/congress-ethics-inside-trading-editorial-debate/125019531
x	GAI Website - Pg. 18	6/12/14		TV Interview	CNN	Anderson Cooper	CNN uses GAI research to expose secret Congressional dues list	https://www.youtube.com/watch?v=Uw6k0nG3Y4
x	GAI Website - Pg. 18	4/16/14	4:23 PM	Article	Business	Charles Koib	Meet Times: Read the Bill	https://www.bloomberg.com/news/first-look-at-the-bill-b-5155473
x	GAI Website - Pg. 18	3/20/14		TV Interview	Fox Business	David ?????	GAI Investigation: Peter Schweizer Talks Bill, Admonishes Hyping Political Influence Against Heavies	https://www.youtube.com/watch?v=DpMS916Y78
x	GAI Website - Pg. 18	2/11/14	12:17 PM	Article	The Salt Lake Tribune	Matt Graham	Boeing sends in Congress comes with big dues for Utah's Chris Brown	https://archive.snhb.com/articles.php?id=5730929&type=CA&SID
x	GAI Website - Pg. 18	1/11/14		TV Interview	Fox 17 Nashville		GAI Investigation: School Lunch Program A Waste	https://archive.snhb.com/articles.php?id=5730929&type=CA&SID
x	GAI Website - Pg. 19	1/11/14		TV Interview	ABC News	David Fitzgerald and Drew Griffin	GAI Investigation: How 'Real' Is Prognosis Among Sports Teams	https://www.abc.com/2014/01/23/politics/political-financing-griffin/
x	GAI Website - Pg. 19	1/23/14		Article	CNN Politics		Ex-Snell Oil president: 'I feel extorted'	https://www.cnn.com/2014/01/23/politics/political-financing-griffin/
x	GAI Website - Pg. 19	1/11/14		Article	Govt Accountability Institute		Obama Campaigns While Danger in Libya Mounts	https://www.breitbart.com/politics/2013/12/20/Obama-Charges-Ho-Mac-Regularity-with-Website-Team-Before-Obama-and-Secretary
x	GAI Website - Pg. 19	12/20/13		Article	Breitbart	Wynton Hall	Obama Closes He Let Regularity With Plastic Team Before Obama Launch	https://www.breitbart.com/politics/2013/12/17/Exclusive-Rep-Pull-Gingrey-Takes-Secretary-Hand-Over-This-Number-And-Name-Of-Your-Briefings-While-the-President
x	GAI Website - Pg. 19	12/17/13		Article	Breitbart	Wynton Hall	Exclusive-Rep, Phil Gingrey to Scold: Prove You Met with President About Obama	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 19	12/12/13		TV mention	Fox News	Sean Hannity	Sanction After Lee: GAI Report Findings are 'Inexcusable, Absolutely Unacceptable' (VIDEO)	http://www.gai-cc.org/wp-content/uploads/2013/12/GAI-Sanction-Meetings-Report-12-1-2013.pdf
x	GAI Website - Pg. 19	12/12/13		Report	Govt Accountability Institute		President's Meetings With Cabinet Secretaries Since the Signing of the Patient Protection and Affordable Care Act: March 23, 2010	
x	GAI Website - Pg. 19	12/7/13	5:00 PM	TV mention	CNN	Dorothy Foerick	David Gergen: Report on ObamaCare Prog Shows 'No One in Charge of White House'	https://www.youtube.com/watch?v=2D1k81BD08
x	GAI Website - Pg. 19	12/10/13		TV mention	Fox News	Meagan Kelly	Obama's Health Care: Focus New Questions	https://www.youtube.com/watch?v=2D1k81BD08
x	GAI Website - Pg. 19	12/5/13		Article	Investor's Business Daily	Peter Schweizer	When Barry Let's Go	https://www.politico.com/story/2013/12/the-zero-summing-president-100767
x	GAI Website - Pg. 20	12/5/13		Article	Breitbart (Website says Fox News)	Wynton Hall	Obama's Health Care: Focus New Questions	https://www.breitbart.com/politics/2013/12/04/ATIS-Calendar-Records-A-Single-One-On-One-Meeting-Between-Obama-and-Secretary
x	GAI Website - Pg. 20	12/4/13		Article	NPR	Diane Rahn	Leading Up to ObamaCare Launch (2)	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	12/4/13	11:50 AM	Radio Interview	NPR	Diane Rahn	Obama's Health Care: Focus New Questions	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
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x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
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x	GAI Website - Pg. 20	11/19/13		Radio Interview	The Blaze	Glen Beck	Peter Schweizer exposes the 'vastion' going on in Washington D.C. and offers some very workable solutions to the problems	https://www.youtube.com/watch?v=UW-SS-Q4R
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GA/Website		Date		Time		Publication Title		Required Interview		File		Link	
Continued	Website	Date	Time	Page	Page	Publication Title	Page	Required Interview	Page	File	Page	Link	Page
x	GAI Website - Pg. 24	4/8/13		Option		The Washington Times				EDITORIAL: The Canine standard		https://www.washingtontimes.com/news/2013/apr/08/the-canine-standard/#ixzz2TBN7vt	
x	GAI Website - Pg. 24	4/5/13	10:31 PM	Special		Fox News		Sean Hannity with Peter Schweizer		VIDEO: "BOOZETOWN 2: THE BUSINESS OF FOOD STAMPS"		https://video.foxnews.com/128041/301001/asp-video-clip	
x	GAI Website - Pg. 24	4/4/13		Special		Fox News		Sean Hannity with Peter Schweizer		FOX News 1-Hour Special Featuring GAI - "BOOZETOWN 2: THE BUSINESS OF FOOD STAMPS"		https://www.foxnews.com/teleshopping/2013/04/04/fox-news-1-hour-special-features-gai-booze-town-2-the-business-of-food-stamps	
x	GAI Website - Pg. 24	4/2/13	12:06 PM	Opinion		Forbes		Peter Schweizer		Wall Street, Political leaders quake in their quest about coming		https://www.forbes.com/sites/peterschweizer/2013/04/02/wall-street-political-leaders-quake-in-their-quest-about-coming-terms/#ixzz2TBN7vt	
x	GAI Website - Pg. 24	3/12/13	12:29 PM	Article		The Washington Free Beacon		Andrew Evans		Obama campaign-turned-homophili will undermine its recovery		https://freebeacon.com/political/article/obama-campaign-turned-homophili-will-undermine-its-recovery/	
x	GAI Website - Pg. 25	2/22/13	8:22 PM	Opinion		Forbes		Peter Schweizer		Foreign donations after seething 2012 report revealed weaknesses		https://www.forbes.com/sites/peterschweizer/2013/02/22/foreign-donations-after-seething-2012-report-revealed-weaknesses/	
x	GAI Website - Pg. 25	2/21/13		Report		Gov't Accountability Institute		Peter Schweizer		As Obama's nomination of Hollywood Mogul Reg. The Crisis, They Sent		https://www.gaiinstitute.com/press-releases/2013/02/21/as-obamas-nomination-of-hollywood-mogul-reg-the-crisis-they-sent	
x	GAI Website - Pg. 25	4/4/13		Opinion		Fox News		Peter Schweizer		70 Rules Yours		https://www.foxnews.com/opinion/peter-schweizer-70-rules-yours	
x	GAI Website - Pg. 25	1/24/13		Special		Fox News		Sean Hannity with Peter Schweizer		Why are IRS audits on donations up by 79% under Team Obama?		https://www.foxnews.com/teleshopping/2013/01/24/why-are-irs-audits-on-donations-up-by-79-under-team-obama	
x	GAI Website - Pg. 25	12/13/12	7:54 AM	Opinion		Forbes		Peter Schweizer		Welcome to "Boozetown", Washington, D.C.		https://www.forbes.com/sites/peterschweizer/2012/12/13/welcome-to-boozetown-washington-dc/	
x	GAI Website - Pg. 25	12/12/12		Opinion		Fox News		Peter Schweizer		A Trillion Dollars Tax Increase That Republicans And Obama		https://www.foxnews.com/teleshopping/2012/12/12/a-trillion-dollars-tax-increase-that-republicans-and-obama	
x	GAI Website - Pg. 25	11/27/12	6:14 PM	Opinion		USA Today		Peter Schweizer		Should Agree To		https://www.usatoday.com/story/opinion/2012/11/27/campaign-finance-should-agree-to/1730311	
x	GAI Website - Pg. 25	11/27/12		Opinion		The Washington Times		Peter Schweizer		Column: Campaign-finance trouble can fix big problems		https://www.washingtontimes.com/news/2012/nov/27/column-campaign-finance-trouble-can-fix-big-problems	
x	GAI Website - Pg. 25	10/25/12	12:07 AM	Opinion		Washington Examiner		Paul Gelicic		SCHEIDTKE: Auto bailout funding more taxpayer cash		https://www.washingtonexaminer.com/obama-campaign-blocks-donations-from-china-allows-paying-from-foreign-countries-to-continue-11/10/25/2012	
x	GAI Website - Pg. 25	10/25/12	4:30 PM	Article		New York Post		Paul Gelicic		Obama campaign blocks donations from China, allows giving from		https://www.nypost.com/2012/10/25/obama-campaign-blocks-donations-from-china-allows-giving-from-foreign-countries-to-continue-11/10/25/2012	
x	GAI Website - Pg. 26	10/25/12		Article		Real Clear Politics (Website says GAI not RCP)		Peter Schweizer		Bum Site Imploded		https://www.realclearpolitics.com/articles/2012/10/25/bum_site_imploded.html	
x	GAI Website - Pg. 26	10/10/12		TV Interview		Fox News		Paul Gelicic		IRS: The Small Business Bully		https://www.foxnews.com/teleshopping/2012/10/10/irs-the-small-business-bully	
x	GAI Website - Pg. 26	10/10/12	2:12 PM	Article		CNN		Paul Gelicic		Foreign Residents Contributing to Campaigns		https://www.cnn.com/2012/10/10/politics/foreign-residents-contributing-to-campaigns/	
x	GAI Website - Pg. 26	10/22/12	3:14 PM	TV Interview		Fox News		Paul Gelicic		Robert Rodde and His Influence on The Election		https://www.foxnews.com/teleshopping/2012/10/22/robert-rodde-and-his-influence-on-the-election	
x	GAI Website - Pg. 26	10/10/12		TV Interview		Fox News		Paul Gelicic		FOXY NEWS: Report: Obama Campaign Collecting More		https://www.foxnews.com/teleshopping/2012/10/10/foxy-news-report-obama-campaign-collecting-more	
x	GAI Website - Pg. 26	10/10/12		TV Interview		Fox News		Paul Gelicic		Donations From India ZIP Codes		https://www.foxnews.com/teleshopping/2012/10/10/donations-from-india-zip-codes	
x	GAI Website - Pg. 26	10/10/12	4:36 PM	Report		Gov't Accountability Institute		Paul Gelicic		GAI Report: An Analysis of FEC Campaign Donations Listing		https://www.gaiinstitute.com/press-releases/2012/10/10/gai-report-an-analysis-of-fec-campaign-donations-listing	
x	GAI Website - Pg. 26	10/21/12	2:12 PM	Article		The Daily Caller		Matthew Boyle		OBAMA CAMPAIGN COLLECTING MORE DONATIONS FROM		https://thedailycaller.com/2012/10/21/obama-campaign-collecting-more-donations-from-non-existent-zip-codes-as-campaign-season-goes-on/#ixzz2A2U3smnTV	
x	GAI Website - Pg. 26	10/21/12		Article		New York Post		Isabel Vincent		NON-EXISTENT ZIP CODES AS CAMPAIGN SEASON GOES ON		https://nypost.com/2012/10/21/non-existent-zip-codes-as-campaign-season-goes-on/	
x	GAI Website - Pg. 26	10/9/12		Article		ABC News		Don't Dwyer		Obama campaign accepted foreign Web donation — and may be		https://abcnews.go.com/Politics/2012/10/09/obama-campaign-accepted-foreign-web-donation-and-may-be-hiding-more/	
x	GAI Website - Pg. 26	10/9/12	3:59 PM	Article		The Daily Beast		Peter Schweizer and Peter J. Boyer		Group Warns of Foreign, Fraudulent Donors to Obama Campaign		https://www.thedailybeast.com/articles/archives/2012/10/09/group-warns-of-foreign-fraudulent-donors-to-obama-campaign.html	
x	GAI Website - Pg. 27	10/10/12	7:54 PM	Response		Gov't Accountability Institute		Peter Schweizer		The Illegal Donor Loophole		https://www.gaiinstitute.com/press-releases/2012/10/10/the-illegal-donor-loophole	
x	GAI Website - Pg. 27	10/10/12	10:28 AM	Report		Gov't Accountability Institute		Peter Schweizer and Peter J. Boyer		GAI Response to Obama Campaign		https://www.gaiinstitute.com/press-releases/2012/10/10/gai-response-to-obama-campaign	
x	GAI Website - Pg. 27	10/9/12	3:59 PM	Article		The Daily Beast		Peter Schweizer		The Truth About Digital Donations		https://www.thedailybeast.com/articles/archives/2012/10/09/the-truth-about-digital-donations.html	
x	GAI Website - Pg. 27	10/1/12	4:45 PM	Article		The Daily Beast		Peter Schweizer		The Illegal Donor Loophole		https://www.thedailybeast.com/articles/archives/2012/10/01/the-illegal-donor-loophole.html	
x	GAI Website - Pg. 27	10/1/12	1:37 PM	Report		Gov't Accountability Institute		Peter Schweizer		JP Morgan's Food Stamp Empire		https://www.gaiinstitute.com/press-releases/2012/10/01/jp-morgans-food-stamp-empire	
x	GAI Website - Pg. 27	9/21/12	12:00 PM	Report		The Daily Beast		Peter Schweizer		Police from Poverty: How Food Stamp Benefit Corporations		https://www.thedailybeast.com/articles/archives/2012/09/21/police-from-poverty-how-food-stamp-benefit-corporations.html	
x	GAI Website - Pg. 27	9/17/12	4:45 AM	Article		The Daily Beast		Peter Schweizer		Interstates, Major Runway's Builders		https://www.thedailybeast.com/articles/archives/2012/09/17/interstates-major-runways-builders.html	
x	GAI Website - Pg. 27	9/9/12	7:08 PM	Report		Gov't Accountability Institute		Peter Schweizer		Meet the Builders		https://www.gaiinstitute.com/press-releases/2012/09/09/meet-the-builders	
x	GAI Website - Pg. 27	9/9/12		Report		Gov't Accountability Institute		Peter Schweizer		Presidential Daily Brief: A Time-Based Analysis		https://www.gaiinstitute.com/press-releases/2012/09/09/presidential-daily-brief-a-time-based-analysis	

GAI Website	Date	Time	Type	Publisher/TV Radio	Reporter/Institution	Title	Link
x	GAI Website - Pg. 27	9/10/12	Opinion	The Washington Post	Marc A. Thiessen	Make Thiessen: Why is Obama skipping more than half of the daily intelligence meetings?	https://www.washingtonpost.com/archive/local/2012/09/10/06624106-1049-11e1-b3-218509054e1_story.html?hpid=hp_hp-top-table-main-obama-skip%3Ahomepage%2Fstory&hpid=hp_hp-top-table-main-obama-skip%3Ahomepage%2Fstory
x	GAI Website - Pg. 27	8/16/12	Article	Breitbart	Peter Schweizer	Corrine, Mitt Romney Will Face No Criminal Charges	https://www.breitbart.com/politics/2012/08/16/Corrine-and-Mitt-Romney-Will-Face-No-Criminal-Charges/
x	GAI Website - Pg. 28	8/14/12	Article	The Daily Beast	Peter Schweizer	Daily Beast: Why Goldman Sachs, Other Wall Street Titans Are Not Being Prosecuted	https://www.thedailybeast.com/articles/archive/2012/08/14/why-goldman-sachs-other-wall-street-titans-are-not-being-prosecuted.html
x	GAI Website - Pg. 28	8/7/12	Article	Washington Examiner	Mark Tappell	Watching Article: Conflicts of Interest may explain lack of DOJ REPORT GRANTING POLITICAL DONATIONS LIKELY BEHIND OBAMA HOLDER FAILURE TO CHANGE ANY BANKERS AFTER 2008 FINANCIAL MELTDOWN	https://www.washingtonexaminer.com/watching-article-conflicts-of-interest-may-explain-lack-of-doj-report-granting-political-donations-likely-behind-obama-holder-failure-to-change-any-bankers-after-2008-financial-meltdown
x	GAI Website - Pg. 28	8/7/12	Article	The Daily Caller	Matthew Boyle	Justice Inspects The Department of Justice's Unprecedented Failure to Prosecute Big Finance	http://www.g4w.com/wp-content/uploads/2012/08/DOJ-Report-4-61.pdf
x	GAI Website - Pg. 28	8/6/12	Report	Gov't Accountability Institute	Peter Schweizer	Three Easy Ways to End Cronyism	https://www.thedailybeast.com/articles/archive/2012/08/06/three-easy-ways-to-end-cronyism.html
x	GAI Website - Pg. 28	8/1/12	Article	The Daily Beast	???	The New GAI: Reporting Sports Superstar Calls for Speed	https://www.thedailybeast.com/articles/archive/2012/08/01/report-sports-superstar-calls-for-speed.html
x	GAI Website - Pg. 28	7/7/12	TV mention	Fox News	Peter Schweizer	President Obama Secretly Tries to Discredit Romney's Campaign	https://www.thedailybeast.com/articles/archive/2012/07/07/president-obama-secretly-tries-to-discredit-romneys-campaign.html
x	GAI Website - Pg. 28	7/19/12	Article	The Daily Beast	Peter Schweizer	SCHEIDT: No Justice in Corrine case	https://www.thedailybeast.com/articles/archive/2012/07/19/scheidt-no-justice-in-corrine-case.html
x	GAI Website - Pg. 28	7/25/12	Opinion	The Washington Times	Peter Schweizer	FOX News: Cronyism in National Defense	https://www.washingtontimes.com/news/2012/jul/25/fox-news-cronyism-in-national-defense/
x	GAI Website - Pg. 28	7/7/12	TV interview	Fox News	Sean Hannity with Peter Schweizer	Inside the Romney 100 Hours	https://www.youtube.com/watch?v=continuu-2&v=683y6h0YtEA
x	GAI Website - Pg. 29	7/19/12	Article	The Washington Times	Hannity: Harper	Inside the Romney 100 Hours	https://www.washingtontimes.com/news/2012/jul/19/hannity-the-romney-100-hours/
x	GAI Website - Pg. 29	7/7/12	TV interview	Fox News	Leah Doherty with Peter Schweizer	FOX Business: How Did Romney's "Hardly Working?"	https://www.foxbusiness.com/story/2012/07/07/romney-hardly-working-fox-business/
x	GAI Website - Pg. 29	7/18/12	Opinion	Politico	Peter Schweizer	Pact vs. mind over fiscal matters	http://www.g4w.com/wp-content/uploads/2012/07/GAI-Report-4-Freshen-Up-Economic-Meetings-A-Times-Based-Analytic.pdf
x	GAI Website - Pg. 29	7/7/12	Report	Gov't Accountability Institute		Presidential Economic Meetings: A Time-Based Analysis	https://www.thedailybeast.com/articles/archive/2012/07/07/president-obama-secretly-tries-to-discredit-romneys-campaign.html
x	GAI Website - Pg. 29	7/7/12	Article	Breitbart	Wynton Hall	The Five Biggest Corporate Political Donors in 2012	https://www.breitbart.com/politics/2012/06/04/ATL-CFO-SETU-Fund-15-Billion-In-Homes-Mortgages-To-JP-Morgan-Chase/
x	GAI Website - Pg. 29	6/4/12	Article	Breitbart	Peter Schweizer	EXCLUSIVE: Hope for a New Investigation Reveals AFL-CIO, SEIU in Bed with JP Morgan Chase	https://www.breitbart.com/politics/2012/06/04/EXCLUSIVE-Hope-for-a-New-Investigation-Reveals-AFL-CIO-SEIU-in-Bed-with-JP-Morgan-Chase/
x	GAI Website - Pg. 29	6/5/12	Article	Breitbart	Wynton Hall	Romney's Anti-Corruption Theme Catching Fire	https://www.breitbart.com/politics/2012/06/05/Romney-s-Anti-Corruption-Theme-Catching-Fire/
x	GAI Website - Pg. 29	6/4/12	Article	Business Insider	Peter Schweizer	This Bank Bashing Union Is Making Money With A High-Interest Credit Card	https://www.businessinsider.com/this-bank-bashing-union-is-making-money-with-a-high-interest-credit-card-2012-6#ixzz21wU3CtUA
x	GAI Website - Pg. 29	5/8/12	Article	Yahoo Finance	Stacy Curran	Why Obama Looks Political Will to Crackdown on Wall Street	https://finance.yahoo.com/blogs/daily-ticker/obama-looks-political-crackdown-against-wall-street-453513152195.html
x	GAI Website - Pg. 29	6/6/12	Article	The Blaze	Glenn Beck	Real News from the Blaze: Need for Government Benefits on the Rise, What Can Be Done?	https://www.theblaze.com/articles/archive/2012/06/06/real-news-from-the-blaze-need-for-government-benefits-on-the-rise-what-can-be-done.html
x	GAI Website - Pg. 30	5/23/12	Article	Breitbart (Website says The Daily Beast)	Wynton Hall	Is the Defense Budget Rife with Waste and Crony Capitalism?	https://www.breitbart.com/politics/2012/05/23/Is-the-Defense-Budget-Rife-with-Waste-and-Crony-Capitalism/
x	GAI Website - Pg. 30	5/23/12	Article	The Daily Beast	Peter Schweizer	Crony Capitalism Creeps Into the Defense Budget	https://www.thedailybeast.com/articles/archive/2012/05/23/crony-capitalism-creeps-into-the-defense-budget.html
x	GAI Website - Pg. 30	5/20/12	Article	Breitbart	Wynton Hall	FBI Probe Of JP Morgan Chase From 1 Month, Rumor Dismissed	https://www.breitbart.com/politics/2012/05/20/FBI-Probe-Of-JP-Morgan-Chase-From-1-Month-Rumor-Dismissed/
x	GAI Website - Pg. 30	5/7/12	Article	Breitbart	Wynton Hall	The Chicago Way: Justice for Sale at Holder's DOJ	https://www.breitbart.com/politics/2012/05/07/justice-for-sale-at-holder-s-doj/
x	GAI Website - Pg. 30	5/17/12	Article	The Daily Caller	Peter Schweizer and Peter J. Boyer	Why JP Morgan Chase Should Not Fear FBI Probe	https://www.thedailycaller.com/articles/archive/2012/05/17/why-jp-morgan-chase-should-not-fear-fbi-probe.html
x	GAI Website - Pg. 30	5/6/12	Article	Newsweek	Peter Schweizer and Peter J. Boyer	WHY CAN'T OBAMA BRING WALL STREET TO JUSTICE?	http://web.archive.org/web/20131101121204/http://www.newsweek.com/2012/05/06/why-cant-obama-bring-wall-street-to-justice.html
x	GAI Website - Pg. 30	4/17/12	Article	The Daily Beast	Peter Schweizer	Mitt Romney Should Discredit Big Campaign Donors	https://www.thedailybeast.com/articles/archive/2012/04/17/mitt-romney-should-discredit-big-campaign-donors.html

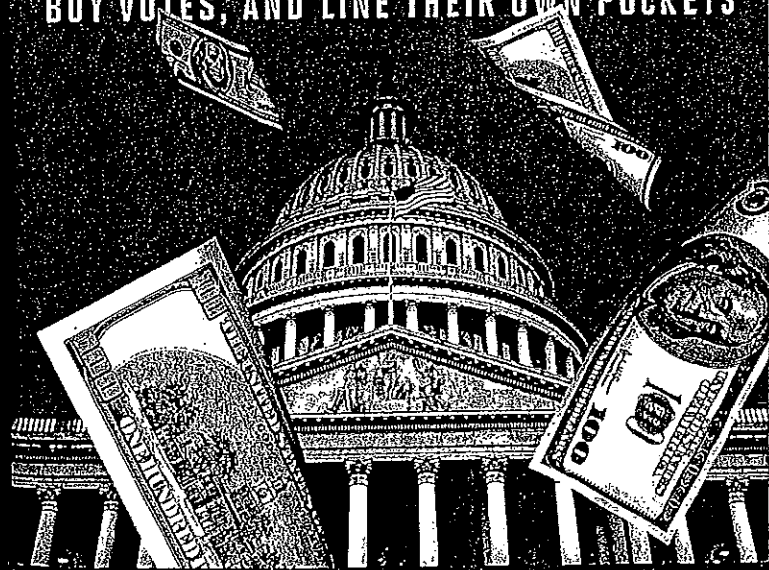
EXHIBIT 6

NEW YORK TIMES BESTSELLER

PETER SCHWEIZER

EXTORTION

HOW POLITICIANS EXTRACT YOUR MONEY,
BUY VOTES, AND LINE THEIR OWN POCKETS



NEW YORK TIMES BESTSELLER

Featured on
60 MINUTES, ANDERSON COOPER 360, CBS THIS MORNING,
FOX & FRIENDS, FOX BUSINESS CHANNEL, FOX NEWS

PRAISE FOR EXTORTION

"We recommend [Schweizer's] book to you highly—a terrific book."
—Lou Dobbs, Fox Business Channel

"A great book—well researched."
—Sean Hannity, Fox News

"Rich in detail."
—Norah O'Donnell, CBS This Morning

"The truth eventually comes out . . . through the work of individuals like Mr. Schweizer . . . If ever there were an issue on which left and right could come together, it's this one."
—New York Times

"Schweizer names guilty parties and specific cases committed by politicians from both sides of the aisle . . . He exposes powerful figures in politics, law firms and corporations."
—Forbes

"The missing link that helps you understand what's going on in Washington these days . . . With example after example, Schweizer describes how the money flows into Washington and how the politicians control those flows . . . [Extortion is] well worth your time."
—Washington Times

ACKNOWLEDGMENTS

This book would not have happened without the dedicated work of Rick White, David Healy, Jr., Sally Jo Roorda, Seamus Bruner, and Wynton Hall. My sincere thanks also goes to Stuart Christmas, Michelle Chandler, Eric Eggers, Peggy Sukhia, Jay Woodham, Tony Mock, Brian Baugus, Bryan Trochessett, Jerome Hudson, Zach Huffman, Mary Francis Dunlap, Blaine Cherry, Joshua Eller, and Sandy Schulz. Thanks also to the board of the Government Accountability Institute who made this possible: Chairman Stephen K. Bannon, Vice Chairman Rebekah Mercer, Ron Robinson, Owen Smith, and Hunter Lewis. Thanks, too, to John Raisian of the Hoover Institution for his friendship and support.

Bruce Nichols of Houghton is not only a superb editor but also a man of keen insight and wisdom. Thanks, Bruce, for another great ride together. And my agent, Glen Hartley, never ceases to amaze me in his ability to keep a project focused. The same goes for Lynn Chu.

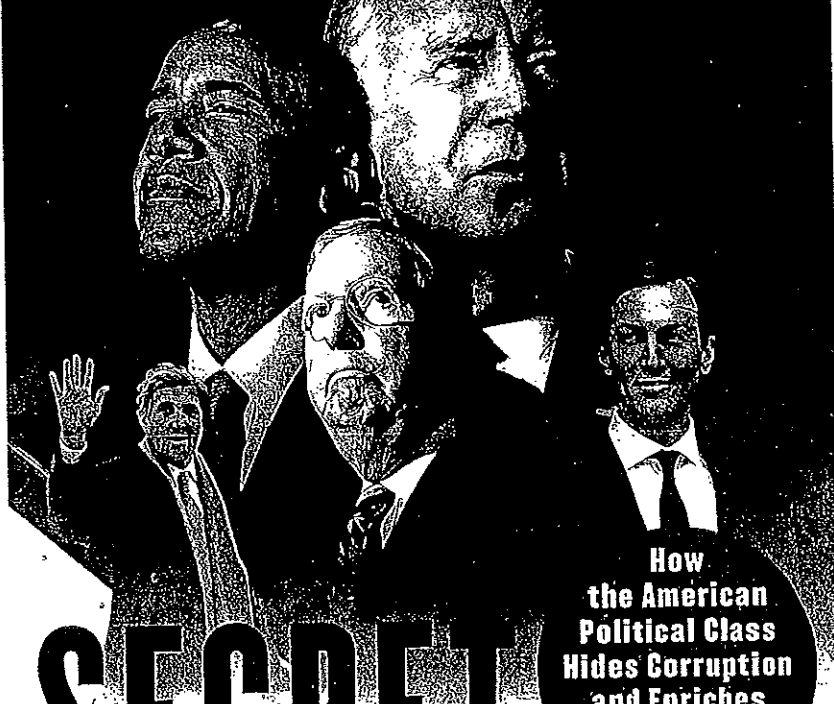
A special appreciation goes to my children, Jack and Hannah, who have inspired me with their grace and character during difficult times. I love you both very much.

The author alone is the responsible for the contents of this book.

EXHIBIT 7

NEW YORK TIMES BESTSELLING AUTHOR OF

PETER SCHWEIZER



SECRET EMPIRES

How
the American
Political Class
Hides Corruption
and Enriches
Family and
Friends

**PRAISE FOR
*CLINTON CASH***

"The most anticipated and feared book of a presidential cycle."
—**NEW YORK TIMES**

"Schweizer is an equal-opportunity investigator,
snaring Republicans as well as Democrats."
—**ELEANOR CLIFT, DAILY BEAST**

"Thank goodness, then, for Peter Schweizer and
his blockbuster exposé *Clinton Cash*."
—**NEW YORK POST**

"A highly effective takedown."
—**PEGGY NOONAN, WALL STREET JOURNAL**

"The new book *Clinton Cash* is compelling reading on how Bill and
Hillary have mixed personal wealth, power, and influence peddling."
—**JEFFREY D. SACHS, DIRECTOR OF THE EARTH INSTITUTE,
COLUMBIA UNIVERSITY**

"On any fair reading, the pattern of behavior that Schweizer
has charged is corruption."
—**LAWRENCE LESSIG, HARVARD LAW SCHOOL**

ISBN 978-0-06-256936-3



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SECRET EMPIRES

How the American Political Class Hides
Corruption and Enriches Family and Friends

PETER SCHWEIZER



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An Imprint of HarperCollins Publishers

ACKNOWLEDGMENTS

Writing a book on a complex and important subject such as this requires a talented team to bring to successful completion. This book represents the culmination of many hours of diligent work by a diverse group of patriotic people.

I was blessed to have the assistance of the following researchers on this project: Brian Baugus, Daniel Boyle, David Brown, Seamus Bruner, Keegan Connolly, Jacob McLeod, Steve Stewart, and Peggy Sukhia. Thanks also go to interns Christina Armes and Hannah Cooperman. I also appreciate the help of Matthew Tyrmand, who helped us connect with researchers in Ukraine for that portion of this project, and David Lawrence, who offered keen legal insight into the remedies proposed in this book.

I cofounded the Government Accountability Institute (GAI) in 2012 with Stephen K. Bannon, who stepped down from the board in 2016 to pursue other notable goals. Today the organization enjoys the benefits of a tremendous board of directors including Chairman Rebekah Mercer, who has enthusiastically supported our work and provided thoughtful leadership. Thanks also go to board members Hunter Lewis, Ron Robinson, and Owen Smith for their insightful guidance.

At GAI we have a formidable band of professional staff who make us one of the most effective investigative organizations in the world. These include Stuart Christmas our general counsel, research director Eric Eggers, program director Steve Post, and

ACKNOWLEDGMENTS

data and technical director Chance Hendrix. Sandy Schulz helps us expertly navigate the world of media and communications. They all contributed mightily to this book. Some GAI employees who also contributed have asked to remain anonymous.

Over the course of the past ten years, I have benefited tremendously from my agents, Glen Hartley and Lynn Chu. I thank them for their continued wise counsel. This is my first book with editor Eric Nelson. Thanks, Eric, for your keen insights and helpful suggestions. You made the long editing process relatively painless.

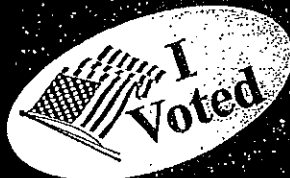
Finally, thanks to my wonderful wife, Rhonda, and to my entire family. Your encouragement and support over the years are much appreciated. I have dedicated this book to my son, Jack, and my daughter, Hannah.

The author alone is responsible for the contents of this book.

EXHIBIT 8

From the investigators who brought you *Clinton Cash*

How the Left Plans to Steal the Next Election



Eric Eggers

Foreword by Peter Schweizer

Foreword

By Peter Schweizer

Although we love to complain about the campaign ads, the long lines at the polls, and all the signs that litter the roadways like falling leaves, we Americans vote. We do it to teach our children how to be good citizens, to keep "them" from getting into office, and to feel a stronger connection with our town, state, and nation. We trudge to the polls in November and tap screens, flip levers, and fill in circles on paper ballots with our #2 pencils.

Voting is a duty, and a right, that men and women have died for. It is an accomplishment and a reminder that we are *consenting* to be governed by choosing our own leaders. Voting is a civil right and a solemn obligation not to take government of, by, and for the people for granted.

It also expresses our trust that our vote will count as much as anyone else's, and that it will be cast fairly, tabulated accurately,

and honored by everyone. As Americans, we're born or become citizens knowing all of that, and we guard it jealously. I once saw a t-shirt that read simply: "MY VOTE CANCELS OUT Y'ALLS."

So, when the subject of voter fraud arises, our jealousy should be aroused. Americans, like free people everywhere, believe in fair play and respect for the rules. We should get fired up when there are credible allegations of vote fraud or ballot tampering. But the truth is that voting in America has long been tainted by documented cases of fraud and other "irregularities." We all have nagging suspicions that some votes were not cast legally, or that scheming political operatives have figured out how to exploit the process and rig an election.

You will read about some of the historical examples of that here. Eric Eggers's book will take you into the world of party bosses who treat the ballot box like a cookie jar, prey on elderly Americans and recent immigrants, and conspire to make sure elections go their way. They succeeded for years, even for decades in some cases.

There is an uncomfortable side to talking about voter fraud. But not to joking about it. "Vote early, vote often" is an old one. So are all the cracks about dead people in Chicago being the real "swing voters" in any Windy City election. For decades, New Jersey Governor Brendan Byrne joked that he wanted to be buried in Hudson County "so that I can remain active in Democratic politics." Perhaps the jokes are a way of acknowledging what most of us already suspect is true: voter fraud really does happen today.

Recent news stories have alleged that Russian intelligence agents tried to hack voter information systems in several states. Sensational charges that spies from other countries may have tried to crack into electronic voting systems themselves have been cited by several states as one reason they are returning to paper ballots and scanners. These attempts are a reminder that our voting systems must be absolutely secure from foreign interference. But what about interference by domestic bad actors?

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This book exposes voter fraud that is all homegrown and has become routine in many parts of America. As you read Eric's findings, you will appreciate that there are many careers that owe their success to exploiting the vulnerabilities in the ways we vote. The techniques of fraud documented here are not hard to do, but they are hard to detect or investigate. That's by design. It's also why they are seldom prosecuted.

The problem is that these kinds of investigations take real effort, cooperation, objectivity, and determination. As you will see in this book, voter fraud can—and does—happen in many different ways. Whether it is done by stealing absentee ballots, inducing noncitizens to cast ballots illegally, voting in multiple states during the same election, or through other devious means, tracking down the perpetrators and proving the fraud is labor-intensive. As we discover at every turn, government agencies that are supposed to ensure the openness and integrity of our elections will throw up roadblocks to outsiders trying to look into these questions. Sometimes, politicians simply deny that a voter fraud problem even exists, or they minimize it, or they question the motives of those who seek the details. But few in government seem very eager to answer these basic questions: Is voter fraud widespread? What can we do to stop it?

Our organization, the Government Accountability Institute (GAI), was born in 2012 to do this kind of work, and ask these sorts of questions. We are a nonprofit group of investigative reporters, researchers, and writers who do our own research and publish our findings in reports, or as raw material shared with media organizations to pursue further, and as books like this one.

While many of the books we've written on government corruption and incompetence bear my name as the author, they all relied on our marvelous team at GAI. They are dogged, curious, skilled investigators who pose the questions, research the facts, and scrutinize the excuses of politicians of both parties. With the support

of our generous donors, we do the legwork that reporters and editors at the major networks and largest newspapers *used* to do, but no longer have the resources or the time to do themselves.

Previous GAI investigations have exposed corruption in Congress, in the vast federal bureaucracy, in political candidates who enrich themselves and their family members through sweetheart deals and subtler forms of bribery. Our most recent book, *Secret Empires*, became a number one bestseller on the *New York Times* list. It reveals the many ways that members of Congress and even a president have enriched their children and closest friends, legally, by taking advantage of loopholes in financial disclosure laws that govern how *they* can earn money, but don't place any restrictions on their family members.

Time will tell if that book leads to changes, but its predecessor certainly did. *Clinton Cash: The Untold Story of How and Why Foreign Governments and Businesses Helped Make Bill and Hillary Rich* dogged Hillary Clinton's 2016 campaign for president with its investigation of the ways Bill and Hillary Clinton leveraged their nonprofit foundation empire for personal gain and engaged in numerous quid pro quo schemes to enrich their friends and donors. That book too was a *New York Times* bestseller, and it was quoted and cited extensively during the presidential campaign. It also was credited with spurring several FBI investigations into the Clinton Foundation and any favors Secretary Clinton may have done on behalf of Foundation donors. GAI's team spent nearly two years researching the stories told in that book, and we're proud of its success.

Earlier efforts took on Congress in *Throw Them All Out*, which documented how congressmen traded their own stock portfolios based on confidential information they learned in supposedly closed hearings. This led to passage of the STOCK Act, outlawing the practice. Our book *Extortion* showed how the Obama Administration targeted industries for criminal investigation but chose

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not to pursue key political donors, slid open the door to then-Speaker John Boehner's "Tollbooth," and how lawmakers used campaign slush funds to bankroll their lavish lifestyles complete with limos, private jets, golf at five-star resorts, fine wines, and cash for family members.

These GAI efforts all helped explain why our government is so dysfunctional: it's all about making money, not making law. *This* book, though, takes on political corruption of a different, related form. Where we have previously focused on how politicians enrich themselves once they get into office, Eric Eggers, Research Director at GAI, tackles the shady ways some of them get there. And stay there.

He will show you how some political operatives do all they can to open voting up to noncitizens living in their jurisdictions, and how they and their wealthy allies fight to block laws requiring voter ID. You will read stories of how *boleteros* and *politiqueros* broker the votes of senior citizens living in nursing homes in Florida and Texas. You'll come to understand that the fights over so-called Motor Voter bills and the current debate in Washington about whether the U.S. Census should ask if someone is a citizen are all about protecting the many strategies for perpetuating routine, reliable, tried-and-true methods of voter fraud.

There are hopeful signs that voter fraud in its many forms is being taken more seriously than in the past. In its first year in office, the Trump administration made one abortive attempt to study voter registration records from all fifty states. A bipartisan commission it created was rebuffed by opposition from many states, who still control this information and aren't eager to share it outside their borders, as we also found when we conducted our own analysis of the voting rolls of twenty-one states. Still, the connection of this issue to the immigration debate, and to the 2020 Census, will keep the questions and the demand for real answers coming. Eric's work, his first as an author, will make it harder to

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make excuses for avoiding honestly measuring the real extent of fraud in American elections. But, as any recovering alcoholic will tell you, the first step is admitting that you have a problem. Eric's book is a great way to start.

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Acknowledgments

There may be some people who are able to conceive, research, draft, and edit a book by themselves. I am not one of those people. This book exists only because of the efforts of an entire team with whom I was fortunate enough to work.

At the Government Accountability Institute, we are blessed with some of the brightest and hardest working researchers and staff in the country. Thanks to all of you for your help and support. Special thanks to Caleb Stephens, Christina Armes, Hannah Cooperman, David Brown, and Mark Hockenga for their help in researching many of the topics this book covers. Thanks also to Tarik Noriega, Steve Post, and Stuart Christmas, who each improved the book in their own way. Joe Duffus provided vital editing, fact checking, and an unyielding advocacy for the removal of any form of the word "impact" as a verb. And this book wouldn't

exist without the research and passion of Will Patrick, who discerned and helped develop many of the themes in these pages.

I wouldn't have the chance to work with the incredible team at GAI if I hadn't met Peter Schweizer, whose remarkable talent is exceeded only by his gracious humility. I am deeply indebted to Peter, as well as Wynton Hall for their mentorship and guidance from beginning to end of this process. Thanks also to publicist extraordinaire Sandy Schulz for her advice and help in turning this book into a reality.

Thank you also to the supreme editing talents of Harry Crocker and Nancy Feuerborn, whose work helped refine and sharpen the key points of this book.

Michael Thielen, Jefferson Knight, and J. Christian Adams all have devoted much of their careers to fighting to expose the reality of voter fraud, and took time to educate me on their efforts and experiences.

I'd also like to thank my wife, Dr. Katie Flanagan, for her steadfast support. She was, as she likes to remind me, my first editor when we worked for the Florida State student newspaper, and I continue to benefit from her editorial judgment. Massive thanks also to my young children Elijah, Ashlynne, and Emerson for not destroying Daddy's computer. Good job, guys—you can eat tonight.

In exploring the plight of immigrants who get caught up unexpectedly into the wide voids of voter registration oversight, immigration attorney Elizabeth Ricci was incredibly helpful and gracious with her time and expertise. Thanks also to David and Joanna Tweedie, who shared their experience as immigrants struggling to navigate the country's confusing laws and guidelines.

Lastly, I have dedicated this book to my grandmother, Fran Thompson, who has worked diligently in her own way to protect the sanctity of American democracy by volunteering as a poll

worker in Charleston, South Carolina, for decades' worth of elec-
tions.

EXHIBIT 9

FOREWORD BY PETER SCHWEIZER

**HOW MONEY AND POLITICS
DRIVE FBI CORRUPTION**

SEAMUS BRUNER
GOVERNMENT ACCOUNTABILITY INSTITUTE

ABOUT THE AUTHOR

Seamus Bruner is the Associate Director of Research at the Government Accountability Institute (GAI). Seamus has worked with GAI since 2013 providing research and support for numerous *New York Times* bestsellers and *60 Minutes* exposés.

Visit SeamusBruner.com to learn more, provide whistleblower tips, and access primary source documents.