

From: [Bob Fealy](#)
To: [Joseph Wenzinger](#)
Cc: [Amy Rothstein](#)
Subject: Re: Advisory Opinion Request
Date: Wednesday, January 27, 2021 4:53:25 PM

Dear Mr. Wenzinger,

We have reviewed the statements made in your email and confirm that all are correct and consistent with our intent and intended use. Please contact me if you require additional information. Robert Fealy, President

On Wed, Jan 27, 2021 at 11:05 AM Joseph Wenzinger <JWenzinger@fec.gov> wrote:

Dear Mr. Fealy:

Thank you for speaking with me by telephone on January 26 about the request for an advisory opinion that you submitted on behalf of Aluminate, Inc.

I would like to verify our understanding of the information that you provided during that discussion. Please respond to this email to confirm the information below, or to clarify or correct any information as necessary. Your response may be posted on the Commission's website as a supplement to the advisory opinion request.

1. Through its proprietary algorithm, Aluminate assigns a numeric score to each individual that one of Aluminate's not-for-profit clients has identified as a potential target for further engagement because of the individual's demonstrated interest in, or pre-existing relationship with, that client.
2. Aluminate does not propose to use information derived from FEC reports in calculating any individual's numeric score.
3. Nor will Aluminate provide information contained in FEC reports to any of its clients.
4. Aluminate proposes to use information derived from FEC reports in two ways. The first is to flag potential areas for further exploration and discussion between an individual identified by an Aluminate client and that client.
5. An individual in a leadership position at an employer, for example, may be interested in

taking on a leadership position or advisory role or mentoring students at a university. Thus, Aluminate might flag for a university client that an individual is in a leadership position, but Aluminate will not identify the position. Similarly, an individual who has contributed to a political committee may be interested in a client's position on social or policy issues. Thus, Aluminate might flag that an individual has made a contribution but will not identify the date, amount, or recipient of the contribution.

6. The second way that Aluminate proposes to use information derived from FEC reports is by matching the names of individuals identified by its clients with contributors listed in FEC reports, as described in Purpose #1 on page 2 of the advisory opinion request. The purpose is to ensure that any subsequent flags by Aluminate of potential areas for further discussion pertain to the correct individual. This process is entirely internal to Aluminate.

Thank you for your cooperation.

Sincerely,

Joseph Wenzinger

Attorney, Policy Division

Office of General Counsel

Federal Election Commission

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