

COPY

RECEIVED
FEDERAL ELECTION
COMMISSION

2011 APR 27 PM 2: 30

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

CELA

MUR 6377

DATE COMPLAINT FILED: September 16, 2010

DATE OF NOTIFICATION: September 23, 2010

LAST RESPONSE RECEIVED: October 14, 2010

DATE ACTIVATED: November 30, 2010

EXPIRATION OF SOL: August 24, 2015 (earliest)
October 19, 2015 (latest)

COMPLAINANT:

Sam Lieberman
Chair, Nevada State Democratic Party

RESPONDENTS:

Friends of Sharron Angle and Alan B. Mills, in his
official capacity as treasurer
Sharron E. Angle
Harry Reid Votes and Allison Van Over, in her
official capacity as treasurer
Daniel J. Tarkanian

RELEVANT STATUTES:

2 U.S.C. § 441a(a)(7)(B)(i)
2 U.S.C. § 441a(a)
2 U.S.C. § 441a(f)
2 U.S.C. § 441d
2 U.S.C. § 432(e)(4)
11 C.F.R. § 109.21
11 C.F.R. § 110.11

INTERNAL REPORTS CHECKED:

Disclosure Reports

FEDERAL AGENCIES CHECKED:

None

I. INTRODUCTION

The complaint alleges that during the 2010 campaign for Nevada's U.S. Senate seat,
Harry Reid Votes and Allison Van Over, in her official capacity as treasurer ("HRV"), made, and
Friends of Sharron Angle and Alan B. Mills, in his official capacity as treasurer ("the Angle
Committee"), and Sharron E. Angle, accepted through their purported agent, Daniel J. "Danny"

11044300669

1 Tarkanian, excessive in-kind contributions in the form of coordinated communications that
2 expressly advocated against Ms. Angle's general election opponent, Senator Harry Reid.¹ See
3 2 U.S.C. § 441a(a)(7)(B)(i). Mr. Tarkanian had previously lost the 2010 Republican Senate
4 primary in Nevada to Ms. Angle. After his loss, Mr. Tarkanian created and operated HRV. The
5 complaint further alleges that the title "Harry Reid Votes" violates 2 U.S.C. § 432(e)(4) of the
6 Federal Election Campaign Act of 1971, as amended, ("the Act"), which prohibits unauthorized
7 committees from using the name of a federal candidate in its title, and that public
8 communications HRV financed did not include the appropriate disclaimers. See 2 U.S.C.
9 § 441d.

10 For the reasons more fully discussed below, we recommend that the Commission find no
11 reason to believe that Friends of Sharron Angle and Alan B. Mills, in his official capacity as
12 treasurer, and Sharron E. Angle violated 2 U.S.C. § 441a(f) and no reason to believe that Harry
13 Reid Votes and Allison Van Over, in her official capacity as treasurer, and Daniel J. Tarkanian
14 violated 2 U.S.C. § 441a(a) in connection with the alleged coordinated communications because
15 the complaint does not provide sufficient facts to support the allegation, and the respondents
16 specifically deny it. We also recommend that the Commission find reason to believe that Harry
17 Reid Votes, and Allison Van Over, in her official capacity as treasurer, violated 2 U.S.C.
18 § 432(e)(4), because it registered as a non-connected political committee impermissibly using the
19 name of a candidate in its title, and violated 2 U.S.C. § 441d, in connection with its failure to
20 include "paid for" and authorization statements in its radio communication. We further
21 recommend that the Commission authorize conciliation prior to a finding of probable cause to

¹ Harry Reid Votes, Harry Reid Votes, Inc., and www.harryreidvotes.com are the same entity. "HRV" refers to all three designations, unless otherwise specified.

11044300670

believe with Harry Reid Votes and approve the attached proposed conciliation agreement

Finally, we recommend that the Commission close the file as to Sharron E. Angle and Friends of Sharron Angle and Alan B. Mills, in his official capacity as treasurer.

II. FACTUAL AND LEGAL ANALYSIS

A. Factual Background

According to the Nevada Secretary of State's website, HRV filed a Non Profit Articles of Incorporation on August 18, 2010, describing as its purpose "to provide public information on federal political races." See Attachment 1. On August 20, 2010, HRV filed a Notice of Section 527 Status with the Internal Revenue Service ("IRS"), describing its purpose the same way, and it has filed disclosure reports with the IRS under Section 527. See Attachment 2; *see also* 26 U.S.C. § 527. On August 24, 2010, HRV filed a Statement of Organization with the Commission, registering as a non-connected political committee with the purpose of opposing Senator Harry Reid. See http://query.nictusa.com/cgi-bin/fecimg/?_10030413054+0. After the Complaints Examination & Legal Administration ("CELA") notified HRV that the instant complaint had been filed against it, HRV submitted a letter to the Commission stating that it had filed the Statement of Organization in error, and that it is not a political action committee or independent expenditure committee. See HRV Letter to the Commission dated October 1, 2010. Due to the ongoing enforcement matter and consistent with usual practice, the October 1, 2010, letter was treated as a termination request and denied pending the resolution of the MUR. See CELA Letter to HRV dated October 20, 2010. Counsel for HRV then submitted a letter stating that HRV's previous letter was not a request to terminate, but rather was meant to inform

11044300671

1 the Commission that its Statement of Organization was "void" and that it would not therefore be
2 filing disclosure reports with the Commission. See HRV Letter dated October 29, 2010.

3 HRV has filed 24-Hour and 48-Hour Independent Expenditure Reports, and a 2010
4 October Quarterly Report with the Commission disclosing receipts of contributions and
5 independent expenditures covering the period of August 1, 2010, through October 19, 2010, as a
6 person or group other than a political committee. See 2 U.S.C. § 434(c). HRV has not filed any
7 disclosure reports of receipts and disbursements with the Commission as a political committee;
8 the Reports Analysis Division ("RAD") has sent notices concerning HRV's non-filed reports.
9 See http://query.nictusa.com/cgi-bin/fecimg/?_10030484425+0; see also
10 http://query.nictusa.com/cgi-bin/fecimg/?_11030574539+0.

11 The complaint alleges that Danny Tarkanian was "apparently an agent of the Angle
12 campaign, and yet has also registered and is operating a political committee, HRV, in order to
13 attack Angle's opponent [in Nevada's 2010 U.S. Senate race], Senator Harry Reid." Complaint
14 at 1-2. Therefore, the complaint alleges, HRV's expenditures for communications, including a
15 radio advertisement and "planned" television advertisements attacking Senator Reid, constitute
16 coordinated communications, and thus excessive contributions made to Ms. Angle and the Angle
17 Committee. *Id.* at 2-5. The complaint further alleges that the disclaimer on HRV's radio
18 advertisement was deficient, and that HRV impermissibly uses the name of a federal candidate in
19 its title. *Id.* at 5-6.

20 HRV and Mr. Tarkanian submitted a joint response ("HRV Response") denying that Mr.
21 Tarkanian was an "agent," as defined by the Commission's regulations, of the Angle Committee
22 because he did not possess actual authority to represent the Angle campaign within the meaning
23 of 11 C.F.R. § 109.3(b). HRV Response at 3. The HRV Response also states that HRV's radio

11044300672

1 advertisement contained an adequate disclaimer, *id.* at 4, and the presence of Harry Reid's name
2 in its title does not violate the prohibition against any unauthorized political committee using the
3 name of any candidate in its name because it is not a federal political committee. *Id.* Finally, the
4 joint response of the Angle Committee and Sharron E. Angle ("Angle Response") denies that
5 any of HRV's public communications were coordinated. Angle Response, at 1.

6 **B. Legal Analysis**

7 **1. Coordination Allegations**

8 Expenditures made by any person in cooperation, consultation, or concert, with, or at the
9 request or suggestion of, a candidate, his or her authorized political committees, or their agents,
10 shall be considered to be a contribution to such candidate. 2 U.S.C. § 441a(a)(7)(B)(i). The
11 Commission's regulations provide that any expenditure for a communication is considered an in-
12 kind contribution to a campaign if it is (1) paid for by an entity other than the campaign,
13 (2) meets certain content standards, including electioneering communications, public
14 communications that contain express advocacy, or public communications that clearly identify a
15 candidate for the Senate within 90 days of an election; and (3) meets certain conduct standards.²
16 See 11 C.F.R. §§ 109.20 and 109.21. For the purpose of coordinated communications, an
17 "agent" is defined as any person who has actual authority, either express or implied, to engage in
18 certain enumerated activities on behalf of a federal candidate, including, *inter alia*, to request or
19 suggest that a communication be created, produced, or distributed; to make or authorize a
20 communication that meets one or more of the content standards set forth in 11 C.F.R.

² The Commission recently revised its coordination communications content prong (11 C.F.R. § 109.24(c)(3) and (c)(5)) in response to the Circuit Court's decision in *Shays v. FEC*, 528 F.3d 914 (D.C. Cir. 2008). The new regulations were effective December 1, 2010. See Explanation and Justification, *Coordinated Communications*, 75 Fed. Reg. 55947 and 55952 (September 15, 2010). Because the activity in this matter occurred prior to December 1, 2010, we are applying the prior regulation, but our coordination analysis includes only 11 C.F.R. § 109.21(c)(4)(i), not the revised subsections.

1 § 109.21(c); to request or suggest that any other person create, produce, or distribute any
2 communication; or to be materially involved in decisions regarding the communication's
3 content, intended audience, means or mode, specific media outlet, timing or frequency, or size or
4 prominence of printed communication, or duration of a communication by means of broadcast,
5 cable or satellite. 11 C.F.R. § 109.3(b)(1)-(6).

6 HRV filed FEC Form 5, Reports of Independent Expenditures Made and Contributions
7 Received, disclosing contributions from individuals and corporations in the amount of \$46,550
8 and independent expenditures of \$39,826.24, all of which were described as opposing candidate
9 Harry Reid. Included in those expenditures were payments of \$2,135 to Red Clay
10 Communications, Inc. for a radio advertisement on September 1, 2010. It does not appear that
11 HRV ran any of the television advertisements it allegedly planned to run at the time of the
12 complaint.

13 The radio advertisement meets the payment and content prongs of the coordination
14 regulations because it was paid for by HRV, an entity other than the campaign, and consisted of
15 a public communication referring to a clearly identified Senate candidate publicly disseminated
16 in the candidate's jurisdiction 90 days or fewer before the general election. *See* 11 C.F.R.
17 §§ 109.21(c)(4)(i), and 109.26. However, based on the complaint and the responses and as
18 explained below, HRV's expenditure for the radio advertisement does not appear to meet the
19 conduct prong. In addition, the costs associated with the radio advertisement, \$2,135, do not
20 exceed the Act's \$5,000 contribution limit to political committees, and HRV did not make any
21 other contributions to the Angle committee that would make this alleged in-kind contribution
22 excessive. 2 U.S.C. §§ 441a(a)(1)(C) and 441a(f).

11044300674

1 Even if the cost of the alleged communications exceeded \$5,000, there is insufficient
2 information that they were coordinated with the Angle campaign. The complaint's allegation that
3 the radio advertisement was coordinated because Mr. Tarkanian was apparently an agent of the
4 Angle Committee rests in part on Tarkanian's appearance at an event called "Gun Rights Night in
5 Nevada," which was paid for and authorized by the Angle Committee, and at which both he and
6 Ms. Angle spoke. See Complaint at Attachment A. The advertisement for the event lists Mr.
7 Tarkanian as a guest speaker on the topic "Is Harry really for gun rights?" and lists key note
8 speaker Angle as the "US Senate Candidate that will defeat Harry Reid." *Id.* The allegation also
9 relies on Mr. Tarkanian's hosting of "Tark Week," which consisted of seven days of campaigning
10 for the Republican Party, including joining volunteers in calling people to ask them to support
11 Reid's opponent, Ms. Angle. Complaint at 2. According to the complaint, "[e]ven apart from
12 Tarkanian technically acting as an agent of Angle's campaign, HRV's communications are
13 probably still 'coordinated communications'" because "Angle or her campaign have probably
14 requested or suggested that HRV create its ads, been materially involved or had substantial
15 discussions about the creation of their ads, or otherwise coordinated their activities." *Id.* at 5.

16 To support its position that there was no coordination, the HRV Response attaches a
17 sworn declaration from Mr. Tarkanian in which he avers that he does not hold, nor has he ever
18 held a position within the Angle campaign. See Declaration of Daniel J. Tarkanian, at ¶ 5. He
19 further avers that he does not possess any authority from the Angle campaign to request or
20 suggest that a communication be created, produced, or distributed; make or authorize any
21 communication; or be materially involved in decisions or hold substantial discussions regarding
22 communications. *Id.* at ¶ 6. He further avers that he has not received any non-public
23 information about the plans, projects, activities, or needs of the Angle campaign; and, to his

11044300675

1 knowledge, no agent of the Angle campaign has requested, suggested, or assented to any
2 communication sponsored by HRV, nor had any material involvement in the creation,
3 production, or distribution of any communication sponsored by HRV. *Id.* at ¶¶ 7-9. See 11
4 C.F.R. § 109.3(b).

5 HRV and Mr. Tarkanian contend that campaigning for the Republican Party, joining
6 volunteers at a phone bank, and serving as a guest speaker at an event do not prove that Mr.
7 Tarkanian was an "agent" of the Angle campaign. HRV Response at 2-3. They further maintain
8 that the conduct standards of 11 C.F.R. § 109.21(d) have not otherwise been met, because the
9 expenditures for the radio advertisement were not made at the request or suggestion of the Angle
10 campaign, nor was there any material involvement, or substantial discussion regarding the
11 advertisements between Mr. Tarkanian and the Angle Committee. *Id.* and Declaration of Daniel
12 J. Tarkanian, at ¶¶ 5-9. See 11 C.F.R. § 109.3(b). The Angle Response also denies that there
13 was any coordination involving the HRV communications, and contends that Mr. Tarkanian's
14 appearance as a guest speaker at a campaign event does not meet the conduct prong's evidentiary
15 standard under 11 C.F.R. § 109.21(d). Angle Response at 1.

16 Based on the complaint's reasons for alleging that Mr. Tarkanian was an "agent" for
17 coordination purposes, and Mr. Tarkanian's sworn declaration, it does not appear that he meets
18 the definition of "agent" set forth at 11 C.F.R. § 109.3(b). Mr. Tarkanian's volunteering at a
19 phone bank in support of Angle, speaking at an event also featuring the candidate, and
20 registering a political committee to oppose Senator Reid do not, by themselves or in conjunction,
21 show that he had actual authority to create or distribute communications on behalf of the Angle
22 campaign. Further, these activities do not provide a sufficient nexus to support the allegation
23 that the Angle Committee "probably" made requests or suggestions, was materially involved in,

11044300676

1 or had substantial discussions about HRV's communications, an allegation specifically denied by
2 both Mr. Tarkanian and the Angle Committee. Complaint at 5; HRV Response at 2-3 and at
3 Tarkanian Declaration at ¶¶ 5-9; Angle Response at 1. Given that Mr. Tarkanian was a 2010
4 Republican primary candidate, it is not surprising that he would oppose Senator Reid in the
5 general election. Accordingly, we recommend that the Commission find no reason to believe
6 that Friends of Sharron Angle and Alan B. Mills, in his official capacity as treasurer, and Sharron
7 E. Angle violated 2 U.S.C. § 441a(f), and that Harry Reid Violated, and Allison Van Over in her
8 official capacity as treasurer, and Daniel J. Tarkanian violated 2 U.S.C. § 441a(a).

9 **2. Alleged Prohibited Use of Candidate's Name**

10 The complaint alleges that HRV, a non-connected political committee, impermissibly
11 included the name of a federal candidate, Senator Harry Reid, in its official title. Complaint at
12 5-6. The Act and the Commission's regulations prohibit the use of a candidate's name in the
13 officially registered name of an unauthorized committee. See 2 U.S.C. § 432(e)(4) and 11 C.F.R.
14 § 102.14(a). There are regulatory exceptions that apply to 1) delegate committees; 2) draft
15 committees; and 3) special projects and other communications of unauthorized committees, if the
16 title clearly and unambiguously shows opposition to the named candidate. 11 C.F.R.
17 102.14(b)(1)-(3); *Explanation and Justification, Special Fundraising Projects and Other Use of*
18 *Candidate Names by Unauthorized Committees*, 59 Fed. Reg. 17267 (April 12, 1994).

19 In its response to the complaint, HRV maintains that the prohibition against using a
20 federal candidate's name in the title of an unauthorized committee does not apply to it, because it
21 is not a political committee. HRV Response at 4. HRV's response further maintains that even if
22 it were a political committee, its title would be lawful, because the possibility of "confusion" and
23 "abuse" is not present here, given that "[a]ll materials that feature HRV's name 'clearly and

11044300677

unambiguously show opposition' to candidates like Senator Harry Reid, and make plain that HRV combats policies those candidates would enact." *Id.*

The Act's prohibition on the use of candidate names applies to unauthorized "political committees." 2 U.S.C. § 432(e)(4). HRV, an unauthorized committee, registered with the Commission with the name "Harry Reid Votes," and during the next five weeks, while so registered, received contributions and made expenditures, including the radio advertisement disclosed above. *See* HRV FEC Form 1 Statement of Organization, filed August 24, 2010. HRV did not seek to change its status until a complaint had been filed against it, and giving effect to an attempt to terminate or to void a political committee's registration in these circumstances would create the possibility of abuse. Moreover, a registered political committee may only terminate by following the procedures of 11 C.F.R. §§ 102.3 (termination of registration) or by operation of 102.4 (administrative termination), neither of which has taken place. Even then, based on long-time Commission practice, a registered political committee may not terminate if it is involved in an enforcement action (MUR), an audit, or litigation with the Commission. In the case of a committee involved in an unresolved MUR, this prohibition maintains an extant entity with

HRV does not allege that it is a delegate committee or draft committee. Therefore, the regulatory exceptions at 11 C.F.R. § 102.14(b)(1) and (2) do not apply. The regulatory exception at 11 C.F.R. § 102.14(b)(3) provides that an unauthorized committee may use a candidate's name in a special project if the title clearly and unambiguously shows opposition to the named candidate. Not only is the title "Harry Reid Votes" not clearly and unambiguously in opposition

11044300678

1 to Senator Reid, but HRV does not contend that it is a special project name. While HRV
2 maintains that the content of its materials that feature Harry Reid's name show opposition to the
3 named candidate, the exception applies to the titles of special projects or other communications
4 by unauthorized committees, without reference to the content. 11 C.F.R. § 102.14(b)(3);
5 Explanation and Justification, *Special Fundraising Projects and Other Use of Candidate Names*
6 *by Unauthorized Committees*, 59 Fed. Reg. 17267 (April 12, 1994). Therefore, HRV violated
7 the Act and the Commission's regulations by registering as an unauthorized political committee
8 that used a candidate's name in its official title.³ See Advisory Opinion 1995-09 (NewtWatch)
9 (the Commission advised an unauthorized committee opposed to then-Speaker of the House of
10 Representatives Newt Gingrich that "the term 'NewtWatch' may not be used as part of the
11 Committee's name). Given the foregoing, we recommend that the Commission find reason to
12 believe Harry Reid Votes and Allison Van Over, in her official capacity as treasurer, violated
13 2 U.S.C. § 432(e)(4) and enter into pre-probable cause to believe conciliation with them.

14 3. Alleged Disclaimer Violation

15 The complaint alleges that HRV's radio advertisement that aired on September 1, 2010,
16 did not include the appropriate disclaimer because it is a public communication and did not state
17 that it was "Paid for by Harry Reid Votes," did not include its address, phone number, or web
18 address, nor a statement whether it was authorized by any candidate. Complaint at 6. All public

³ In MUR 6213(DUMPREID), the Commission exercised its prosecutorial discretion and dismissed the complaint with a caution against an unauthorized committee for, *inter alia*, using the name of a federal candidate in an acronym in the committee's title, that otherwise used its full name (which did not include a candidate's name). In that MUR, the committee filed an amended Form 1 stating that its name was "Decidedly Unhappy Mainstream Patriots Rejecting Evil-mongering Incompetent Democrats (DUMPREID PAC)." See MUR 6213. The Commission determined that the committee may have violated 2 U.S.C. § 432(e)(4) and 11 C.F.R. § 102.14(a) by including Senator Reid's name as part of the committee's official name in its initial Form 1 filing, but the committee's use of Reid's name in its website, www.dumpreid.com, was permissible because the website was a special project whose title was clearly and unambiguously in opposition to Senator Reid. See MUR 6213 (DUMPREID PAC) Factual and Legal Analysis at 3 - 5.

11044300679

11044300680

1 communications, as defined by 11 C.F.R. § 100.26, made by a political committee must include
2 a disclaimer. 2 U.S.C. § 441d(a) and 11 C.F.R. § 110.11(a)(1). If the communication is not
3 authorized by a candidate, an authorized political committee of a candidate, or its agents, it must
4 clearly state the name and permanent street address, telephone number, or World Wide Web
5 address of the person who paid for the communication, and that the communication is not
6 authorized by any candidate or candidate's committee. 2 U.S.C. § 441d(a)(3) and 11 C.F.R.
7 § 110.11(b)(3). A radio communication that is not authorized by a candidate or the candidate's
8 authorized committee must also include an audio statement that "_____ is responsible for
9 the content of this advertising" with the name of the political committee or other person paying
10 for the communication in the blank. See 2 U.S.C. § 441d(d)(2) and 11 C.F.R. § 110.11(c)(4)(i).

11 According to HRV's response, the disclaimer rules do not apply to the radio
12 advertisement because it is not an electioneering communication given that it aired more than 60
13 days before the 2010 general election. HRV Response at 4, n.16; see also 11 C.F.R.
14 §§ 100.29, 110.11(a)(4). HRV's response also states that even if the disclaimer rules do apply,
15 they were not violated because the radio advertisement contained the statement "Harry Reid
16 Votes is responsible for the content of this advertising" and included HRV's website address. *Id.*

17 A transcript of the radio advertisement is as follows:

18 SPOT ONE: WAGING WAR

19
20 Right now, a war is being waged in Nevada. Liberals are funneling
21 millions into our state to reelect their puppet Harry Reid. What Does
22 Nevada say? NO MORE.
23 NO MORE to Senator Reid's uncontrolled spending.
24 NO MORE to his secret backroom meetings that will bankrupt future
25 generations.
26 NO MORE to his taxes on hardworking families and businesses.
27 Protect Nevada today by visiting HarryReidVotes.com to learn 1001
28 reasons to fire Harry Reid.
29 Harry Reid Votes is responsible for the content of this advertisement.

1 See [http://www.advocacyink.com/posts/independent-political-committee-launches-statewide-](http://www.advocacyink.com/posts/independent-political-committee-launches-statewide-radio-buy-harryreidvotescom-to-run-1st-in-s.com)
2 [radio-buy-harryreidvotescom-to-run-1st-in-s.com](http://www.advocacyink.com/posts/independent-political-committee-launches-statewide-radio-buy-harryreidvotescom-to-run-1st-in-s.com) (last accessed March 16, 2011).

3 The disclaimer for this radio advertisement, which is a public communication, does not
4 fully comply with the Act and the Commission's regulations. Because HRV was a registered
5 non-connected political committee when it ran this advertisement (which was before it notified
6 the Commission that it considered its registration an error), the disclaimer should have included
7 its permanent street address, that it paid for the communication, and that the communication was
8 not authorized by any candidate or candidate's committee. See 2 U.S.C. § 441d(a)(3) and
9 11 C.F.R. § 110.11(b)(3). It apparently complied with the audio statement required for radio
10 communications, and included its name and website address. See 2 U.S.C. § 441d(d)(2) and
11 11 C.F.R. § 110.11(c)(4)(i). Therefore, we recommend that the Commission find reason to
12 believe Harry Reid Votes and Allison Van Over, in her official capacity as treasurer violated
13 2 U.S.C. § 441d(a) and authorize pre-probable cause to believe conciliation with them.

14 **III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY**

15
16
17
18
19
20
21

11044300681

11044300682

IV. RECOMMENDATIONS

1. Find no reason to believe Friends of Sharron Angle and Alan B. Mills, in his official capacity as treasurer, and Sharron E. Angle violated 2 U.S.C. § 441a(f).
2. Find no reason to believe Harry Reid Votes and Allison Van Over, in her official capacity as treasurer, and Daniel J. Tarkanian violated 2 U.S.C. § 441a(a).
3. Find reason to believe Harry Reid Votes and Allison Van Over, in her official capacity as treasurer, violated 2 U.S.C. § 432(e)(4).
4. Find reason to believe Harry Reid Votes and Allison Van Over, in her official capacity as treasurer, violated 2 U.S.C. § 441d(a).
5. Enter into pre-probable cause to believe conciliation with Harry Reid Votes and Allison Van Over, in her official capacity as treasurer.
6. Approve the Attached Factual and Legal Analyses.
7. Approve the attached conciliation agreement.
8. Approve the appropriate letters.

9. Close the file as to Friends of Sharron Angle and Alan B. Mills, in his official capacity as treasurer, Sharron E. Angle, and Daniel L. Tarkamian.

4/27/11
Date

Christopher Hughey
Acting General Counsel

BY:

Stephen A. Gura
Stephen A. Gura
Deputy Associate General Counsel for
Enforcement

Susan L. Lebeaux
Susan L. Lebeaux
Acting Deputy Associate General Counsel
for Enforcement

Christine C. Gallagher
Christine C. Gallagher
Attorney

Attachments:

1. Articles of Incorporation for Harry Reid Votes
2. Political Organization Notice for Section 527 Status for Harry Reid Votes

11044300683

**Political Organization
Notice of Section 527 Status**

OMB No. 1545-1693

Part I General Information

1 Name of organization
HARRY REID VOTES

Employer identification number
27-3285024

2 Mailing address (P.O. box or number, street, and room or suite number)

3008 CAMPBELL CIRCLE

City or town, state, and ZIP code
LAS VEGAS, NV 89107

3 Check applicable box: ☒ Initial notice ☐ Amended notice ☐ Final notice

4a Date established
08/18/2010

4b Date of material change

5 E-mail address of organization
no@gmail

6a Name of custodian of records
DANNY TARKANIAN

6b Custodian's address
3008 CAMPBELL CIRCLE
LAS VEGAS, NV 89107

7a Name of contact person
DANNY TARKANIAN

7b Contact person's address
3008 CAMPBELL CIRCLE
LAS VEGAS, NV 89107

8 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
3008 CAMPBELL CIRCLE

City or town, state, and ZIP code
LAS VEGAS, NV 89107

9a Election authority

9b Election authority identification number

NONE

Part II Notification of Claim of Exemption From Filing Certain Forms (see instructions)

10a Is this organization claiming exemption from filing Form 8872, Political Organization Report of Contributions and Expenditures, as a qualified state or local political organization? Yes ☐ No ☒

10b If "Yes," list the state where the organization files reports:

11 Is this organization claiming exemption from filing Form 990 (or 990-EZ), Return of Organization Exempt from Income Tax, as a caucus or association of state or local officials? Yes ☐ No ☒

Part III Purpose

12 Describe the purpose of the organization

Provide public information on federal political races.

Attachment 2
Page 1 of 2

11044300684

Part IV List of All Related Entities (see instructions)

13 Check if the organization has no related entities ☒

14a Name of related entity	14b Relationship	14c Address
----------------------------	------------------	-------------

Part V List of All Officers, Directors, and Highly Compensated Employees (see instructions)

15a Name	15b Title	15c Address
----------	-----------	-------------

ALLISON VAN OVER

Officer

3008 CAMPBELL CIRCLE

LAS VEGAS, NV 89107

Under penalties of perjury, I declare that the organization named in Part I is to be treated as a tax-exempt organization described in section 527 of the Internal Revenue Code, and that I have examined this notice, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. I further declare that I am the official authorized to sign this report, and I am signing by entering my name below.

ALLISON VAN OVER

08/20/2010

**Sign
Here**

Name of authorized official

Date

Attachment

Page

2

of

2

11044300685