FIRST GENERAL COUNSEL'S REPORT

MUR: 6916
DATE COMPLAINT FILED: 2/18/2015
DAMES OF NOTIFICATION: 2/27/2015
DATE OF LAST RESPONSE: 5/21/2015
DATE ACTIVATED: 6/24/2015

ELECTION CYCLE: 2006 through 2016
EARLIEST SOL: 7/29/2010
LATEST SOL: 10/31/2020

COMPLAINANT: Foundation for Accountability and Civic Trust

RESPONDENTS: Democratic National Committee, et al.\(^2\)

RELEVANT STATUTES AND REGULATIONS:
- 52 U.S.C. § 30116\(^3\)
- 52 U.S.C. § 30118
- 52 U.S.C. § 30119
- 52 U.S.C. § 30125

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. INTRODUCTION

This matter concerns a complaint against the Democratic National Committee ("DNC"), the Democratic Senatorial Campaign Committee ("DSCC"), the Democratic Congressional

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1 Complainant alleges violations of the Act dating back to Catalist's founding. Compl. at 18 (Feb. 18, 2015). Records from the Delaware Division of Corporations list Catalist's date of formation as July 29, 2005.

2 See Appendix A for the complete list of respondents. As indicated in the Appendix, the Commission received numerous responses in this matter. Many responses were filed on behalf of a single entity, while others were filed jointly on behalf of numerous respondents.

3 On September 1, 2014, the Federal Election Campaign Act of 1971, as amended (the "Act"), was transferred from Title 2 to new Title 52 of the United States Code.
Campaign Committee ("DCCC"), 11 state and local Democratic Party committees (collectively, "Party Committee Respondents"); 384 authorized candidate committees (collectively, "Authorized Committee Respondents"); and 2 vendors, Catalist, LLC ("Catalist") and NGP VAN, LLC ("NGP VAN").

The Complaint alleges that, beginning in the 2006 election cycle and continuing to the present, Respondents violated the Federal Election Campaign Act, as amended, (the "Act"), in three ways. First, the Complaint alleges that Catalist, a limited liability company and government contractor, made excessive or prohibited in-kind contributions to the Respondent Committees by providing data and services at below-market rates. Second, the Complaint contends that Catalist and NGP VAN acted as "common vendors" and shared voter data they received from the Respondent Committees with other non-campaign clients making independent expenditures. As a result, these unnamed organizations allegedly made excessive or prohibited in-kind contributions to Respondent Committees in the form of coordinated communications. Third, the Complaint asserts that the DNC established, finances, maintains, or controls Catalist, and through Catalist, has accepted contributions in violation of the soft money ban.

None of the Respondents appear to have violated the Act. First, disclosure reports show that just 15 of the 398 Respondent Committees made disbursements to Catalist between 2010

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4 The Commission terminated 78 of the 384 Authorized Committee Respondents before the complaint was filed. As of the date of this report, the Commission has rejected termination requests from 35 additional Authorized Committee Respondents based on the pendency of this matter.

5 The Complaint names 400 respondents. All references in this report to "Respondents" are intended to include all 400 respondents; references to "Respondent Committees" include the 14 Party Committee Respondents and 384 Authorized Committee Respondents.

6 Pursuant to 52 U.S.C. § 30145(a), the statute of limitations has run with respect to activity that occurred more than five years ago.

7 Compl. at 18.
and the present. Thus, the allegation that Catalist provided its services to the Respondent Committees at below-market rates applies to only a small subset of the Respondents. Regarding that subset, sworn and specific information indicates that Catalist is a legitimate business with both political and non-political clients, and that Catalist uses the same fixed criteria to set prices for all of them. Thus, the available information is sufficiently persuasive to rebut the inferences drawn in the Complaint.

As to the allegation that Catalist and NGP VAN served as “common vendors” between Respondent Committees and other spenders, thus resulting in coordinated communications, there is no information to suggest that either vendor provides services to “create, produce, or distribute” communications, as required by the “common vendor” standard. Accordingly, this allegation fails to satisfy the conduct prong of the Commission’s coordination regulation.

Finally, the available information does not support the claim that the DNC established, finances, maintains, or controls Catalist and thereby accepted soft money. Although Catalist’s founders and several known investors have ties to the DNC and Democratic causes, other characteristics of their overall relationship indicate that the DNC did not establish and does not finance, maintain, or control Catalist. Moreover, we have no information suggesting that the funds Catalist receives are not provided in exchange for the goods and services it provides its clients or as part of a legitimate business venture on the part of its investors.

Accordingly, we recommend that the Commission find: (1) no reason to believe Respondents violated 52 U.S.C. §§ 30116, 30118, or 30119 by making or receiving excessive or prohibited in-kind contributions in the form of discounted data and services; (2) no reason to believe Respondent Committees violated 52 U.S.C. §§ 30116 or 30118 by receiving excessive or

* Unlike Catalist, nearly all of the Respondents Committees used NGP VAN's software services. See infra n. 39.
prohibited in-kind contributions in the form of communications coordinated through alleged common vendors Catalist and NGP VAN; and (3) no reason to believe the DNC or Catalist violated 52 U.S.C. § 30125 by soliciting, receiving, or directing funds that were not subject to the prohibitions, limitations, and reporting requirements of the Act.

II. FACTS

A. Catalist

1. Description of Catalist’s Business and Operations

Catalist is a limited liability company that “provide[s] progressive organizations with the data and services needed to better identify, understand, and communicate with the people they need to persuade and mobilize.” According to its website, Catalist sells access to current data on 280 million people, as well as web-based software and other data-mining tools that help customers profile and target specific individuals. The company has a variety of clients, including candidates, political committees, nonprofit organizations, colleges and universities, and media outlets. It is also a federal contractor, having received two awards from the Government Accountability Office in 2014 totaling $64,970. Harold Ickes and Laura Quinn founded Catalist in 2005. Both have ties to the Democratic Party. Ickes served as White House Deputy Chief of Staff under President Clinton and is a member of the DNC and the DNC’s Rules and Bylaws Committee, while Quinn served

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10 Id.
11 Id.; see also Catalist Resp. at 1 & n.1 (Apr. 9, 2015).
12 Compl. at 19 & Ex. A.
as Deputy Chief of Staff for Vice President Gore and consultant to various Democratic candidates and officeholders.¹³

According to Catalist, the company uses a subscription-based pricing model for its data sales.¹⁴ Under this model, clients pay a flat fee for year-long access to a particular “tier” of data and analytical tools.¹⁵ Catalist bases its prices on the tier a client selects and the geographic scope of the client’s needs.¹⁶

Catalist has provided a sworn affidavit from Quinn certifying that the company uses this same pricing model for all clients.¹⁷ Quinn affirms that “Catalist provides services based on each customer’s needs with a consistent market driven pricing schedule applied evenly to all customers. No favored deals are provided to any federal candidates or committees.”¹⁸ This assertion is supported by the terms of at least one Respondent Committee’s contract with Catalist. Specifically, Respondent Hillary Clinton for President (“HCFP”) provided a copy of its 2007 Data License and Services Agreement with Catalist, which warrants that the terms of Catalist’s service to HCFP were comparable to the terms available to Catalist’s non-campaign clients and not intended to result in a contribution to the committee.¹⁹ The contract states:

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¹³ Both Catalist and the DNC assert that the DNC did not authorize or play an active or significant role in establishing Catalist and does not have any authority to participate in or direct Catalist’s operations. DNC Resp. at 4-5 & Ex. A (Declaration of Brad Marshall, hereafter “Marshall Declaration”) (July 16, 2015). The DNC also notes that Ickes is 1 of 451 members of the DNC and 1 of 30 members of the Rules and Bylaws Committee. DNC Resp. at 5.

¹⁴ Catalist Resp. at 7 & Ex. A (Aff. of Laura Quinn, hereafter “Quinn Aff.”).

¹⁵ Id.

¹⁶ Id.

¹⁷ Quinn Aff. ¶ 8; see also Catalist Resp. at 3 (“Catalist has a consistent, usual and normal pricing structure within which all contracts fall. . . . No favored deals are provided to any federal candidates or committees.”).

¹⁸ Quinn Aff. ¶ 8.

[Catalist's] performance of the Services, and the terms and conditions contained herein, shall not knowingly be in violation of any applicable laws, rules, or regulation, in that these terms and provisions would be available to and required of non-campaign clients of Catalist and are no more or less favorable than offered to non-campaign clients, if any. Catalist intends to fully comply with all applicable Federal Election Commission regulations and has examined and structured this arrangement so as to prevent a contribution from resulting from either (a) Catalist to Customer or (b) another customer of Catalist to Customer. 20

No other Respondents supplied copies of their contracts with Catalist.

The Complaint questions the pricing model, alleging that the resulting prices are below the usual and normal charge for such goods. As support, the Complaint cites statements from the 2012 book, The Victory Lab, by reporter Sasha Issenberg, which chronicles the growing role of statistical modeling in political campaigns. 21 Issenberg writes that Catalist has "little interest in profit," and "pay[s] attention to revenue but [is] more interested in keeping its prices down to help partisan and ideological allies win elections." 22 These statements are not attributed to any source.

With the exception of HCFP, neither the Complainant nor the Respondents present information about the specific rates that Catalist charged its clients or the other terms of their contracts. However, the Commission's disclosure database shows that since 2010, only 15 of the 398 Respondent Committees reported disbursements to Catalist, ranging from the Monterey County Democratic Central Committee Federal's disbursement of $250 in 2012 to the DSCC's total payment of $247,750 in 2010. Below is a complete list of the Respondent Committees that have reported disbursements to Catalist since 2010:

20 Id. at 5 & Ex. A at 8.
22 Id. at 176, 179.
1 None of the remaining Respondent Committees have disclosed disbursements to Catalist since 2010, and, in fact, many Respondent Committees deny having ever contracted with

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<table>
<thead>
<tr>
<th>Respondent</th>
<th>Years Contracted</th>
<th>Amount(s) Paid to Catalist</th>
</tr>
</thead>
<tbody>
<tr>
<td>DNC</td>
<td>2011</td>
<td>$12,000.00</td>
</tr>
<tr>
<td></td>
<td>2010</td>
<td>$76,333.93</td>
</tr>
<tr>
<td>DSCC</td>
<td>2014</td>
<td>$53,337.00</td>
</tr>
<tr>
<td></td>
<td>2011</td>
<td>$9,000.00</td>
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<tr>
<td></td>
<td>2010</td>
<td>$240,300.00</td>
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<tr>
<td>DCCC</td>
<td>2012</td>
<td>$153,300.00</td>
</tr>
<tr>
<td></td>
<td>2010</td>
<td>$171,000.00</td>
</tr>
<tr>
<td>Committee to Elect Alan Grayson</td>
<td>2014</td>
<td>$30,750.00</td>
</tr>
<tr>
<td></td>
<td>2012</td>
<td>$21,000.00</td>
</tr>
<tr>
<td>Garamendi for Congress</td>
<td>2012</td>
<td>$3,040.00</td>
</tr>
<tr>
<td>Ami Bera for Congress</td>
<td>2012</td>
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</tr>
<tr>
<td>Becerra for Congress</td>
<td>2012</td>
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<td>Texans for Henry Cuellar Congressional Committee</td>
<td>2010</td>
<td>$1,019.71</td>
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<tr>
<td>Arizona State Democratic Central Executive Committee</td>
<td>2011</td>
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<tr>
<td>Democratic Executive Committee of Florida</td>
<td>2015</td>
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<tr>
<td></td>
<td>2013</td>
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<tr>
<td>Monterey County Democratic Central Committee Federal</td>
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<tr>
<td>Ohio Democratic Party</td>
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<td>$19,998.00</td>
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<tr>
<td>Vermont State Democratic Federal</td>
<td>2011</td>
<td>$500.00</td>
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<tr>
<td></td>
<td>2010</td>
<td>$2,250.00</td>
</tr>
</tbody>
</table>

Catalist.\(^{24}\) We have no information that suggests the Respondent Committees used Catalist’s
data services without a contract or payments to Catalist.

In addition to the statements regarding Catalist’s motives, the Complaint alleges that
Catalist uses investments from wealthy donors to keep costs low for political clients and
maintain a price structure that is below the usual and normal charge.\(^{25}\) Catalist acknowledges
that, in addition to its customer subscriptions, the company raises revenue through private
offerings.\(^{26}\) By the end of 2006, the company initiated two private offerings for investors,\(^{27}\) and
in 2013, it announced another major fundraising effort, with a lead investment of $2.25 million
by billionaire George Soros.\(^{28}\) In 2014, the Democracy Alliance, a network of supporters of
liberal causes and candidates, also appears to have encouraged its members to invest in
Catalist.\(^{29}\) Although we do not know what Soros and others may have received in return for their
investments, Catalist asserts that “the provision of data and information services is a legitimate
business opportunity in the political arena and elsewhere.”\(^{30}\) In support of this claim, Catalist
cites several news articles regarding the business opportunities associated with data brokering,

\(^{24}\) See, e.g., Resp. of DCCC et al. at 2 (Apr. 27, 2015); Friends of Michelle Resp. (Apr. 12, 2015); Walsh for
(Apr. 24, 2015).

\(^{25}\) Compl. at 21-22.

\(^{26}\) Catalist Resp. at 2 & Quinn Aff. at 1; see also Compl. at 19, 21.

\(^{27}\) Catalist Resp. at 2.

\(^{28}\) Press Release, Catalist, Soros to Lead New Investment in Progressive Data Company Catalist (Nov. 14,

\(^{29}\) Compl. at Ex. B (DEMOCRACY ALLIANCE, SPRING 2014 INVESTMENT RECOMMENDATIONS at 17-18 (2014)
(urge Democracy Alliance partners to provide “baseline support for Catalist of at least $500,000....”).

\(^{30}\) Catalist Resp. at 6-7.
including one article stating that data brokering is a $300 billion-a-year industry. The company also points to its nonpolitical customers, such as AOL, Pandora, Yahoo!, the Pew Charitable Trusts, and many major educational institutions, to demonstrate that it is a legitimate data service provider.

2. Data Sharing Between Catalist and Respondent Committees

The Complaint contends that, as part of their agreements with Catalist, Respondent Committees share their internal voter files with the company on an ongoing basis. It asserts that if a Catalist customer obtains new information about a voter — for example, from a voter registration card it collects — Catalist receives that information in a regular “syncing” of the customer’s list with Catalist’s servers. This regular merging, the Complaint argues, folds customers’ data into the Catalist database and makes the information immediately available to other Catalist customers. As an example, the Complaint quotes the following passage from The Victory Lab, in which Issenberg provides an account of the relationship that President Obama’s 2008 campaign had with Catalist and NGP VAN:

Being one client among many in Catalist’s portfolio of progressive institutions allowed the [Obama] campaign to create seamless links across the activist left, including with outside groups with whom candidates were legally prohibited from coordinating directly. When Democracia USA collected a new voter’s registration form in Florida, Obama’s targeting team often knew about it before the local board of elections. Democracia would create a record in its databases, which synced daily with Catalist’s servers. When the Obama campaign conducted its daily download from

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32 Catalist Resp. at 3, 6-7 & n.2

33 Id. (citing THE VICTORY LAB).

34 Id.
Catalist’s database, per its contract with the information vendor, the new record would show up in the VAN. The campaign could start treating the person as a voter — assigning model scores, canvassing her, communicating by mail and phone, or getting her an absentee ballot — even before the registration had been officially processed.\textsuperscript{35}

Issenberg does not identify sources for this account. Catalist disputes Issenberg’s account, stating that Catalist customers retain ownership of the data and information they provide to Catalist, and that, pursuant to Catalist’s Data Services and Licensing Agreement, Catalist shares data between clients only pursuant to “legally sufficient written list exchange or purchase agreement[s], executed by both exchanging parties.”\textsuperscript{36}

**B. NGP VAN**

NGP VAN is a technology provider that primarily sells web-based software to facilitate fundraising, compliance, field organizing, new media, and social networking.\textsuperscript{37} According to its website, NGP VAN’s clients include “all the national Democratic committees, thousands of Democratic campaigns, and hundreds of labor unions, progressive and non-partisan PACs, and other organizations.”\textsuperscript{38} The Commission’s disclosure data shows that all but 4 of the 398 Respondent Committees reported disbursements to NGP VAN between 2010 and the present.\textsuperscript{39}

The Complaint alleges that NGP VAN has “joined forces” with Catalist to “create a seamless link across the activist left” to facilitate the sharing of customer data.\textsuperscript{40} The implication appears to be that Catalist customers use NGP VAN software to compile voter data and maintain

\textsuperscript{35} THE VICTORY LAB at 299; \textit{see also} Compl. at 22.

\textsuperscript{36} Catalist Resp. at 8 & Quinn Aff. ¶ 10.


\textsuperscript{38} \textit{Id}.


\textsuperscript{40} Compl. at 22 (quoting THE VICTORY LAB at 299).
internal lists, and a partnership between NGP VAN and Catalist allows the easy merging of
customer lists with the Catalist database. NGP VAN denies the allegation that it facilitates coordination. Press releases available
on both the NGP VAN and Catalist web sites show that the two companies have collaborated at
times. However, we have no additional information on the extent of the relationship between
the two companies or the entities with which Catalist and NGP VAN may have allegedly
coordinated.

Two Respondent Committees supplied copies of their contracts with NGP VAN, one of
which appears relevant to this allegation. Cooper for Congress Committee ("Cooper"), the
principal campaign committee of Rep. Jim Cooper (TN-05), provided a copy of a licensing
agreement for NGP VAN's "contribution web package," which gave Cooper access to NGP
VAN's web-based software for managing campaign data and filing campaign finance reports, as
well as a lease to use space on NGP VAN's servers. Section 7(b) of the agreement provides
that "[a]ny data placed in the Software by Licensee and any data specific to Licensee e-mail list
or volunteer sign-ups or online contributions are the property of the Licensee and shall not be

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41 Id.
42 NGP VAN Resp. at 1 (Apr. 12, 2015).
43 In 2014, the two companies announced a partnership on a project called the "Activist Continuum," which
used NGP VAN tools to better synthesize and organize the Catalist's data and analytics. Press Release, Catalist,
NGPVAN and Catalist Partner on Innovative "Activist Continuum" Project for the National Education Association
44 The other NGP VAN contract, submitted by Jeff Holmes for Congress, the principal campaign committee
of an unsuccessful candidate for Michigan's Fourth District, was a contract for website design, and did not appear to
involve the exchange of any voter data. See Jeff Holmes for Congress Resp. (Mar. 13, 2015).
45 Cooper Resp. at 2-3 & Ex. 1 (Apr. 21, 2015).
used by NGP VAN for any purpose other than in connection with the performance of this
Agreement."\textsuperscript{46} We do not have any other agreements between the Respondents and NGP VAN.

C. Respondent Committees

The remaining 398 Respondents are party and authorized candidate committees that are
alleged to have contracted with Catalist, NGP VAN, or both.\textsuperscript{47} The list includes the DNC, the
DSCC, the DCCC, 10 state party committees, and the authorized committees of 2 former
presidential candidates, 43 Senate candidates, and 339 House candidates.

III. LEGAL ANALYSIS

A. Respondents Did Not Make or Receive Excessive or Prohibited
Contributions in the Form of Goods Provided at Less Than the "Usual and
Normal Charge"

The Act defines "contribution" as "any gift, subscription, loan, advance, or deposit of
money or anything of value made by any person for the purpose of influencing any election for
Federal office."\textsuperscript{48} Under the Commission's regulations, the provision of any goods or services
without charge or at a charge that is "less than the usual and normal charge" for such goods or
services is a contribution.\textsuperscript{49} The "usual and normal charge" for goods is "the price of those
goods in the market from which they ordinarily would have been purchased at the time of the
contribution."\textsuperscript{50} The "usual and normal charge" for non-volunteer services is "the hourly or
piecework charge for the services at a commercially reasonable rate prevailing at the time the

\textsuperscript{46} \textit{Id.} at Ex. 1.

\textsuperscript{47} As indicated above, 15 of the Respondent Committees appear to have contracted with Catalist between
2010 and the present, and 394 of the Respondent Committees appear to have contracted with NGP VAN during the
same period.


\textsuperscript{49} 11 C.F.R. § 100.52(d)(1).

\textsuperscript{50} \textit{Id.} at § 100.52(d)(2).
services were rendered. The Commission has previously opined that entities may establish the "usual and normal charge" of goods or services by reference to the "fair market price" of goods or services, "commercial considerations," or the fee provided to "similarly situated persons in the general public."

Under the Act, a federal contractor may not make contributions to political parties or candidates. A limited liability company that is not a federal contractor may make contributions to parties and candidates under certain circumstances, but such contributions are subject to the Act's limits. Correspondingly, federal candidates, their authorized committees, and political party committees may not knowingly accept a prohibited or excessive contribution.

See MUR 5682 (Bachmann for Congress) (finding that the respondent assigned an appropriate valuation to a mailing list where the respondent had consulted with a "reputable list broker" regarding the "proper fair market value" of the list); see also AO 2010-30 (Citizens United) ("Because the 'fair market price' is the price of the list in the market in which lists are ordinarily rented at the time of the rental, the 'fair market price' is the usual and normal charge for renting the list [of email contacts].").

AO 2012-31 (AT&T) (opining that AT&T's proposed rate structure for text-message fundraising was not a contribution because, although rates would be lower than those AT&T usually charges to use its text message platform, the proposed rates would cover the company's costs as well as profit and would be offered on the same terms to all political customers).

AO 2004-6 (Meetup) (concluding that a fee is usual and normal if the charge is "set in accordance with the fixed set of fee criteria" and "applied equally between the various classes of candidates... and other members of the general public who are similarly situated with respect to the respective classes of candidates and political committees."); see also AO 2014-09 (Reed Marketing).


11 C.F.R. § 110.1(g)(2) (permitting limited liability companies to make contributions pursuant to 11 C.F.R. § 110.1(e) (regarding contributions by partnerships) when the limited liability company has elected to be treated as a partnership for IRS purposes and when the LLC has not made an election to be treated as either a partnership or a corporation). We do not know whether Catalist has elected to be treated as a partnership by the Internal Revenue Service.

See 11 C.F.R. § 110.1(e).

According to the Complaint, Catalist has provided goods and services to the Respondent Committees at rates below "the usual and normal charge" since 2006. The Complaint does not present any information about how much Catalist charges the Respondent Committees or the extent to which those prices differed from prevailing market rates. Instead, the Complaint infers that the Respondent Committees received discounted rates from statements in The Victory Lab that Catalist lacked a profit motive and information showing that Catalist receives significant investments from wealthy Democratic backers.

In contrast to the Complaint's general and inferential support, Respondents present specific and sworn information to refute the allegation. According to Quinn and several of the Respondent Committees that have contracted with Catalist, the respective contracts were arm's-length commercial transactions, for which the Respondent Committees paid significant sums. Moreover, Quinn affirms that Catalist uses fixed criteria to determine how much it charges its clients, and that these criteria are applied equally to similarly-situated political and non-political clients. Other than the unattributed statements in The Victory Lab, we have no information

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59 Compl. at 20-21.  
60 See Part II.A.1.  
61 Catalist Resp. at Quinn Aff. ¶ 9 ("All contracts are negotiated at arms [sic] length between Catalist and its customers."); Resp. of DCCC et al. at 2; HCFP Resp. at 4-5; Resp. of Democratic Exec. Comm. of Fla., et al. (Apr. 24, 2015); see also supra Part II.A.1.  
62 Catalist Resp. at 6-7. This fact alone may suffice to show that Catalist's rates are "usual and normal." We currently lack information — such as the number of names or data points purchased by particular Respondent Committees — that would typically establish whether lists were purchased at market value. However, the Commission has previously opined that a vendor does not make a contribution to a political committee when the vendor uses fixed criteria to determine its price structure and applies those criteria equally to similarly-situated political and non-political clients. AO 2004-6 (Meetup). Here, the available information suggests that Catalist uses fixed criteria (namely, the types of data and analytics required and geographic scope of a contract) to determine its prices. The company claims to apply these criteria to all clients, whether political or not, a claim which is consistent with the terms of the 2007 HCFP-Catalist contract. See Part II.A.2. Admittedly, without details about the tiers and geographic areas selected by particular Respondent Committees or information about the rates Catalist offers to other similarly-situated clients, we cannot conclusively establish that Catalist's rates satisfy the Meetup standard; however, the company's sworn statements and the HCFP contract suggest that they do.
suggesting that Quinn’s averments are not true. Further, Catalist has a long list of non-political clients, including AOL, Pandora, Yahoo!, the Pew Charitable Trusts, major universities such as Harvard, Stanford, Duke and Yale, and the federal government. And although Catalist’s founders and prominent investors are noted Democratic supporters, the company has presented information to show that data brokering in general — and Catalist in particular — is a legitimate business that serves a wide range of clients and can produce significant profits and other opportunities. In light of this information, the Complaint’s suggestion that investments in Catalist were motivated by anything other than business considerations is speculative and unsupported by the available facts.

Although no party presents clearly dispositive information to show that Catalist’s rates are usual and normal, Catalist’s sworn affidavit and the information that the Respondent Committees present are sufficiently persuasive to rebut the inferences the Complaint draws. Purely speculative charges or charges based on unverifiable assertions are not considered adequate grounds to proceed with an administrative inquiry, especially when rebutted by contrary information. Accordingly, we recommend that the Commission find no reason to believe that Catalist or the Respondent Committees violated 52 U.S.C. §§ 30116, 30118, or 30119.

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63 Catalist Resp. at 2 & n.2.
64 Catalist Resp. at 7; see also supra Part II.A.1.
65 Factual and Legal Analysis at 6, MUR 5845 (Citizens for Truth) ("On balance, while the Responses do not delve into great detail to support their denials [of the allegation], the allegations in the complaint lack sufficient facts to warrant an investigation.").
66 Id. at 5 ("[P]urported information from 'several anonymous sources on the campaign trail'... can and should be afforded no weight as no details are provided and there is no way to verify the information"); Statement of Reasons of Comm’rs Mason, Sandstrom, Smith, & Thomas at 1-2, MUR 4960 (Hillary Rodham Clinton for U.S. Senate Exploratory Comm.) ("[C]omplaints not based upon personal knowledge should identify a source of information that reasonably gives rise to a belief in the truth of the allegations presented.").
B. **Respondent Committees Did Not Receive Excessive or Prohibited Contributions in the Form of Coordinated Communications Through Common Vendors**

According to the Complaint, the Respondent Committees coordinated with unnamed third-party organizations on unspecified communications made between 2006 and the present by sharing strategic data through common vendors, Catalist and NGP VAN. The Complaint alleges that these coordinated communications constitute excessive, prohibited, or unreported in-kind contributions from the third-party organizations to the Respondent Committees.

The Act considers any expenditure made by a person "in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, authorized political committee, or a national or state party committee" to be an in-kind contribution. These are considered "coordinated expenditures." An expenditure for a communication is coordinated when the communication: (1) is paid for, in whole or part, by a person other than the candidate, committee, or party; (2) satisfies at least one of the content standards described in 11 C.F.R. § 109.21(c); and (3) satisfies at least one of the conduct standards described in 11 C.F.R. § 109.21(d).

The Complaint generally alleges that the payment and content standards may be satisfied by the fact that non-campaign clients of Catalist and NGP VAN "spent upwards of $100 million on public communications that advocate the election of Democrat [sic] candidates or defeat of

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67 Compl. at 25-26.
68 Id.
70 11 C.F.R. § 109.20.
71 Id. § 109.21(a)(1)-(3).
Republicans" in the 2014 election cycle. It goes on to list a "sample" of Catalist and NGP VAN clients that reported independent expenditures during the 2014 election cycle. However, the information before the Commission does not satisfy the conduct prong. The Complaint argues that this case satisfies the conduct requirements because Catalist and NGP VAN acted as "common vendors" between the Respondent Committees and the groups making the alleged communications. The "common vendor" standard is satisfied if all of the following are true: (1) the person paying for the communication employs a commercial vendor to "create, produce, or distribute" the communication; (2) the vendor has provided certain delineated services to the recipient of the contribution during the 120 days preceding the communication; and (3) the vendor conveys non-public information about the campaign's "plans, projects, activities, or needs," or services previously provided to the campaign by the vendor, and that information is material to the creation, production, or distribution of the communication.

Here, the "common vendor" standard is not met because no information suggests that either Catalist or NGP VAN provide services to "create, produce, or distribute" communications. Catalist sells access to data files and analytical tools and clients may then, at their own

72 Compl. at 23 (citing a general search page on OpenSecrets.org permitting a user to search by "viewpoint" of the spender).

73 Id. at 23. ("A sample of [Catalist's] soft-money outside groups include America Votes, EMILY's List, Ready for Hillary, AFL-CIO Workers' Voices, NARAL, League of Conservation Voters, Planned Parenthood, and SEIU's federal committee. [citation omitted] Combined with the reported independent expenditures of the DSCC and DCCC, these and other Catalist client outside groups spent over $100 million in public communications and other reportable 'independent expenditures' this cycle."); see also id. at 26 ("[O]utside groups, such as EMILY's List, have access to the Democratic political party and federal candidate client lists and voter data files through the 'seamless links across the activist left' created by Catalist.").

74 Id. at 25-27.

75 "Commercial vendor" means any persons providing goods or services to a candidate or political committee whose usual and normal business involves the sale, rental, lease or provision of those goods or services. 11 C.F.R. § 116.1(c).

discretion, use the selected data and tools to carry out campaign activities. Similarly, NGP VAN sells licenses to use its software, which licensees may then use to carry out various campaign activities. The available information does not indicate that either Catalist or NGP VAN help clients select data or use selected data to achieve particular ends. Accordingly, neither Catalist nor NGP VAN appears to be a commercial vendor employed to "create, produce, or distribute" communications for their clients under the "common vendor" standard. Because all three factors must be satisfied in order to meet the definition of a "common vendor," it is unnecessary to analyze the second or third factors. And because the information before the Commission is insufficient to satisfy the conduct prong, it is unnecessary to analyze the payment and content prongs. Accordingly, we recommend that the Commission find no reason to believe Respondent Committees violated 52 U.S.C. §§ 30116 or 30118 by receiving excessive or prohibited in-kind contributions in the form of communications coordinated through alleged common vendors Catalist and NGP VAN.

77 11 C.F.R. § 109.21(d)(4)(i); Coordinated and Independent Expenditures, 68 Fed. Reg. 421, 436 (Jan. 3, 2003) ("Thus, this standard only applies to a vendor whose usual and normal business includes the creation, production, or distribution of communications, and does not apply to the activities of persons who do not create, produce, or distribute communications as a commercial venture."); see also MUR 6077 (Norm Coleman) (finding that no coordination occurred where a vendor did not participate in creating, producing or distributing advertisements); MUR 6038 (Doug Lamborn, et al.) (dismissing as a matter of prosecutorial discretion allegations of coordination arising out of groups sharing voter lists through a vendor).

78 Even if Catalist were to satisfy all three factors of the "common vendor" standard, the company appears to qualify for the firewall "safe harbor" of the coordination standard. See 11 C.F.R. § 109.21(h)(1)-(2). According to the regulations, the conduct prong of the coordination standard is not met if a vendor has established and implemented a written firewall policy that is designed and implemented to prohibit the flow of information between employees providing services for a person paying for a communication and the employees providing services to a candidate identified in the communication or his committee, an opponent, or a political party. Id. Catalist has supplied a copy of its firewall policy, which appears to meet the requirements of the safe harbor, see Catalist Resp. at 9 & Ex. B, and Complainant has presented no information suggesting that the firewall is insufficient or ineffective.
C. The DNC and Catalist Did Not Solicit, Receive, or Direct Soft Money

Finally, the Complaint alleges that the DNC established, finances, maintains, or controls Catalist and through Catalist has accepted contributions in violation of the soft money ban.\(^{79}\)

The Complaint specifically points to the investments that Catalist has received as examples of such contributions not subject to the limits and prohibitions of the Act.\(^{80}\)

As amended by the Bipartisan Campaign Reform Act ("BCRA"), the Act prohibits national party committees from soliciting, receiving, or directing another person to make a contribution, donation, or transfer of funds, or any other thing of value, that is not subject to the prohibitions, limitations, and reporting requirements of the Act.\(^{81}\) This "soft-money ban" also applies to entities that are directly or indirectly established, financed, maintained, or controlled by a national party committee.\(^{82}\) Ten non-exclusive factors (collectively, "EFMC factors") set out in 11 C.F.R. § 300.2(c)(2) determine whether a person or entity ("sponsor") "directly or indirectly established, financed, maintained or controlled" another person or entity under 52 U.S.C. § 30125. These factors must be examined in the context of the overall relationship between the sponsor and the entity to determine whether the presence of any factor or factors is evidence that the sponsor "directly or indirectly established, financed, maintained or controlled" the entity.\(^{83}\)

Here, the DNC and Catalist do not appear to have violated these provisions of the Act. The Complaint focuses on two EFMC factors that it believes demonstrate the relationship.
between the DNC and Catalist. First, the Complaint contends that Harold Ickes's overlapping
membership in Catalist and the DNC indicates a formal or ongoing relationship between the two
organizations. Second, the Complaint argues that Ickes's role and the investments by
prominent Democratic donors demonstrate that the DNC had an active or significant role in the
formation of Catalist.

Although neither Catalist nor the DNC disputes that Ickes is a DNC member or that two
of Catalist's investors have also supported Democratic candidates and causes, the totality of
evidence does not support a finding that the DNC established, financed, maintained, or
controlled Catalist. As affirmed in the Quinn Affidavit, and the declaration of DNC CFO and
Custodian of Records, Brad Marshall, the DNC does not own any Catalist voting stock or
securities; have voting power or other decision-making authority over Catalist and does not
participate in its governance; have the authority or ability to hire, appoint, demote, or otherwise
control the officers, or other decision-making employees of Catalist, or provide funds or goods
to Catalist other than those it has paid for services rendered. Moreover, even though Ickes is a
DNC member, he is only 1 of 451 DNC members, and 1 of 30 members of the DNC's Rules and
Bylaws Committee, and the mere involvement of one DNC member in Catalist, a private
venture, does not establish that Catalist is controlled by the DNC or acts at its behest.

84 Id. at § 300.2(c)(2)(iv).
85 Id. at § 300.2(c)(2)(ix).
86 Catalist Resp. at Ex. A; DNC Resp. at Ex. A; see 11 C.F.R. § 300.2(c)(2)(i).
87 Catalist Resp. at Ex. A; DNC Resp. at Ex. A; see 11 C.F.R. § 300.2(c)(2)(ii).
88 Catalist Resp. at Ex. A; DNC Resp. at Ex. A; see 11 C.F.R. § 300.2(c)(2)(iii).
89 Catalist Resp. at Ex. A; DNC Resp. at Ex. A; see 11 C.F.R. § 300.2(c)(2)(vii)-(viii).
Moreover, even if the Commission were to assume that the DNC established Catalist, a
violation of section 30125 exists only if the DNC or Catalist accepted contributions, donations,
or transfers of funds, or any other thing of value that is not subject to the Act's source and
amount limitations.90 We are aware of no information, however, that suggests that any funds
Catalist receives are not provided in exchange for the goods and services it provides its clients or
as part of a legitimate business venture on the part of its investors, as Catalist contends.
Accordingly, we recommend that the Commission find no reason to believe that Catalist and the
DNC violated 52 U.S.C. § 30125 by soliciting, receiving, or directing contributions, donations,
transfers of funds, or any other thing of value, that is not subject to the prohibitions, limitations,
and reporting requirements of the Act.

IV. RECOMMENDATIONS

1. Find no reason to believe that Catalist and the Respondent Committees violated
52 U.S.C. §§ 30116, 30118, or 30119 by making or receiving prohibited in-kind
contributions in the form of data and analytical tools.

2. Find no reason to believe that Catalist, NGP VAN, and the Respondent
Committees violated 52 U.S.C. §§ 30116 or 30118 by making or receiving
prohibited or excessive in-kind contributions in the form of coordinated
communications.

3. Find no reason to believe that Catalist or the DNC violated 52 U.S.C. § 30125 by
soliciting, receiving, or directing funds that were not subject to the prohibitions,
limitations, and reporting requirements of the Act.

4. Approve the attached Factual and Legal Analysis.

5. Approve the appropriate letters.


52 U.S.C. § 30125; see 11 C.F.R. § 300.10(a)(1).
4 4

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2

1

Kathleen Guith
Acting Associate General Counsel for
Enforcement

Stephen J. Fine
Deputy Associate General Counsel for
Enforcement

Peter G. Blumberg
Assistant General Counsel

Meredith K. McCoy
Attorney
FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL’S REPORT
APPENDIX A

RESPONDENTS:*

Democratic National Committee and Andrew Tobias in his official capacity as treasurer

Democratic Senatorial Campaign Committee and Deanna Nesburg in her official capacity as treasurer

Democratic Congressional Campaign Committee and Kelly C. Ward in her official capacity as treasurer

Catalist, LLC

NGP VAN, LLC

State & Local Party Committee

Arizona State Democratic Central Executive Committee and Rick McGuire in his official capacity as treasurer

Democratic Executive Committee of Florida and Judy Mount in her official capacity as treasurer


† Respondents denoted by this symbol submitted a joint response.

‡ Respondents denoted by this symbol submitted a joint response.
Authorized Committee Respondents:

Maine Democratic State Committee and Betty Johnson in her official capacity as treasurer

Mississippi Democratic Party PAC and Ryan Brown in his official capacity as treasurer

Monterey County Democratic Central Committee Federal and Thomas Montgomery in his official capacity as treasurer

New Jersey Democratic State Committee and Kelly Stewart Maer in her official capacity as treasurer

Democratic Party of New Mexico and Robert Lara in his official capacity as treasurer

Ohio Democratic Party and Fran Alberty in her official capacity as treasurer

Tennessee Democratic Party and Wade Munday in his official capacity as treasurer

Texas Democratic Party and Gilberto Hinojosa in his official capacity as treasurer

Vermont State Democratic Committee Federal Account and James Ashley in his official capacity as treasurer

A Whole Lot of People for Grijalva Congressional Committee and Maya Castillo in her official capacity as treasurer

Aaron Woolf for Congress and Sue Montgomery Corey in her official capacity as treasurer

Adam Clayton Powell for Congress and Mark Jay Weinstein in his official capacity as treasurer

Adam Smith for Congress Committee and Jay Petterson in his official capacity as treasurer

Respondents denoted by this symbol submitted a joint response.

Respondents denoted by this symbol submitted a joint response.
Aimee Belgard for Congress and Sander Friedman in his official capacity as treasurer

Al Franken for Senate 2014 and Thomas H. Borman in his official capacity as treasurer

Alaskans for Begich 2014 and Connie Sanders in her official capacity as treasurer

Alex Sink for Congress and Jennifer May in her official capacity as treasurer

Alison for Kentucky and Robert C. Stilz III in his official capacity as treasurer

Amanda Curtis for Senate and Mary Sexton in her official capacity as treasurer

Américan for Gabriel Rothblatt and Taj Alice Jones Rothblatt in her official capacity as treasurer

Ami Bera for Congress and Jennifer May in her official capacity as treasurer

Andre Carson for Congress and Timothy J. Moriarty in his official capacity as treasurer

Anesa for Iowa and Eric Bearbower in his official capacity as treasurer

Ann Callis for Congress and Jennifer May in her official capacity as treasurer

Appel for Iowa, Inc. and Sally Pedersen in her official capacity as treasurer

Barbara Lee for Congress and Loraine Binion in her official capacity as treasurer

Barbara Mulvaney for Congress and Jana Mulvaney in her official capacity as treasurer

Battle for Congress and Gil Baird in his official capacity as treasurer

Beale for Congress and Steven R. Burris in his official capacity as treasurer
Beatty for Congress and Jeffrey A. Ruppert in his official capacity as treasurer

Becerra for Congress and Robert Herrera in his official capacity as treasurer

Bellows for Senate and Daniel Hildreth in his official capacity as treasurer

Ben Nelson 2012 and Jessica Lathrop in her official capacity as treasurer

Beto O'Rourke for Congress Committee and Susannah Byrd in her official capacity as treasurer

Bill Foster for Congress and Aesook Byon in his official capacity as treasurer

Blumenauer for Congress and Henry Hewitt in his official capacity as treasurer

Bobby for Michigan and Daniel Pydyn in his official capacity as treasurer

Bock for Congress and Steven Goldberg in his official capacity as treasurer

Bonamici for Congress and Elise Greene in her official capacity as treasurer

Bonnie Watson Coleman for Congress and Donna Genges Watson in her official capacity as treasurer

Brad Ashford for Congress and Frank Barrett in his official capacity as treasurer

Braley for Iowa and Theresa L. Kehoe in her official capacity as treasurer

Brenda Lawrence for Congress and Lindsay Angerholzer in her official capacity as treasurer

Brian Higgins for Congress and Gary Kanaley in his official capacity as treasurer

Bruce Davis for Congress and Glenda Denise Clark in her official capacity as treasurer
Bruce Elder for Congress and Larry Hoover in his official capacity as treasurer

Butterfield for Congress and Scott R. Falmlen in his official capacity as treasurer

Cain for Congress and Jeremy Fischer in his official capacity as treasurer

Cannon for Congress and Jennifer May in her official capacity as treasurer

Carl Sciortino Committee and Francis Pemberton Brown in her official capacity as treasurer

Carol Shea-Porter for Congress and Mary Dimodica-Kulju in her official capacity as treasurer

Cartwright for Congress and Jennifer May in her official capacity as treasurer

Castor for Congress and Amy Diamond in her official capacity as treasurer

Castro for Congress and Jose H. Villarcal in his official capacity as treasurer

Childers for Senate Inc. and Marylin Jones in her official capacity as treasurer

Chris Coons for Delaware and Judith Zamore in her official capacity as treasurer

Cicilline Committee and Nancy L. Benoit in her official capacity as treasurer

Citizens for Boyle and Lindsay Angerholzer in her official capacity as treasurer

Citizens for Michael Wager and Peggy Gries Wager in her official capacity as treasurer

Clarke for Congress and Ray L. Trotman in his official capacity as treasurer

Clay Aiken for North Carolina and Eugene Conti in his official capacity as treasurer
Cohn for Congress and Bob Friedman in his official capacity as treasurer

Cole for Congress and Nicholas Finc in his official capacity as treasurer

Committee to Elect Alan Grayson and Dustin Andersen in his official capacity as treasurer

Committee to Elect Abel J Tapia and Keith Carpenter in his official capacity as treasurer

Committee to Elect Gary L. Ackerman, Inc. and Robert Barnett in his official capacity as treasurer

Committee to Elect Keith Ruehl and Anthony Joseph Delmonte in his official capacity as treasurer

Committee to Elect Leslie to Congress and Judy Pingel in her official capacity as treasurer

Committee to Elect Martha Robertson Enid Littman in her official capacity as treasurer

Committee to Elect Paul Clements and Allen Webb in his official capacity as treasurer

Committee to Re-Elect Henry “Hank” Johnson and Malcolm A. Cunningham in his official capacity as treasurer

Committee to Re-Elect Linda Sanchez and Jennifer May in her official capacity as treasurer

Committee to Re-Elect Loretta Sanchez and Katharine Meyer Borst in her official capacity as treasurer

Committee to Re-Elect Nydia M. Velazquez and Betty Diana Arce in her official capacity as treasurer

Connie Johnson for Oklahoma and Linda J. Huggins in her official capacity as treasurer

Connolly for Congress and John Jennison in his official capacity as treasurer
Cooper for Congress and Robert A. Davidson in his official capacity as treasurer

Corry Westbrook for Congress and Catherine E. Wenzing in her official capacity as treasurer

Cory Booker for Senate and Scott Kobler in his official capacity as treasurer

Courtney for Congress and Tim Poloski in his official capacity as treasurer

Crisco for Congress and Keith Crisco in his official capacity as treasurer

Crowley for Congress and Scott G. Kaufman in his official capacity as treasurer

Dan Lipinski for Congress and Jerome R. Hurckes in his official capacity as treasurer

David M. Alameel for United States Senate and David Pulling in his official capacity as treasurer

Daylin for Congress and Christopher Massicotte in his official capacity as treasurer

Debbie Dingell for Congress and Martha Darling in her official capacity as treasurer

Debbie Wasserman Schultz for Congress and Lawrence Wasserman in his official capacity as treasurer

Defazio for Congress and Jef A. Green in his official capacity as treasurer

Delbene for Congress and Jay Pettersson in his official capacity as treasurer

Denney for Congress and Wayne Harrison in his official capacity as treasurer

Denny Heck for Congress and Jay Pettersson in his official capacity as treasurer

Diana Degette for Congress and Edgar Neel in his official capacity as treasurer
Dilan for New York and Christian Espinal in his official capacity as treasurer

Doiggett for Congress and James E. Cousar in his official capacity as treasurer

Domina for Nebraska Inc. and Fred A. Lockwood in his official capacity as treasurer

Donald M. Payne Jr. for Congress and H. O'Neil Williams in his official capacity as treasurer

Donna Edwards for Congress and Janice Edwards in her official capacity as treasurer

Dr. Raul Ruiz for Congress and John Pinkney in his official capacity as treasurer

Duckworth for Congress and Keith D. Lowey in his official capacity as treasurer

Dutch Ruppersberger for Congress and David C. Deger in his official capacity as treasurer

Ebbin for Congress and Patsy Ticer in her official capacity as treasurer

Ed Jany for Congress and Jennifer May in her official capacity as treasurer

Eggman for Congress 2014 and Jay Petterson in his official capacity as treasurer

Ehrlich for Congress and Kirsten L. Koester in her official capacity as treasurer

Elect April Freeman and Betty Kostrach in her official capacity as treasurer

Elisabeth Jensen for Congress and Laura Anne D'Angelo in her official capacity as treasurer

Elizabeth Colbert Busch for Congress and Claus Busch in his official capacity as treasurer

Ellison for Congress and Carla Kjellberg in her official capacity as treasurer
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<th>Number</th>
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<td>1</td>
<td>Eloise Gomez Reyes for Congress and William P. Smith in his official capacity as treasurer</td>
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<td>Enyart for Congress and Brent M. Gaines in his official capacity as treasurer</td>
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<td>Erin Bilbray for Congress and William Stanley in his official capacity as treasurer</td>
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<td>Erin McClelland for Congress and Douglas Campbell in his official capacity as treasurer</td>
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<td>Espaillat for Congress and Rafael Lantigua in his official capacity as treasurer</td>
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<td>Filemon Vela for Congress and Mary Jo Vela in her official capacity as treasurer</td>
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<td>Fred Kundra for Congress Committee and William M. Bristol in his official capacity as treasurer</td>
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<td>Frederica S. Wilson for Congress and Larry Handfield in his official capacity as treasurer</td>
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<td>Friends for Gregory Meeks and Patsy A. Simmons in her official capacity as treasurer</td>
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<td>Friends for Jim McDermott and Philip Lloyd in his official capacity as treasurer</td>
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<td>Friends of Alexandra and Alexandra Eidenberg in her official capacity as treasurer</td>
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Friends of Amy Tavio and Sarah Hyder in her official capacity as treasurer

Friends of Bill Tilghman and Christian D. Tilghman in his official capacity as treasurer

Friends of Cheri Bustos and Jeanette Hunter in her official capacity as treasurer

Friends of Corrine Brown and Gloria Simmons in her official capacity as treasurer

Friends of Curtis C. Osborne and Christopher Eugene Carter in his official capacity as treasurer

Friends of Dan Kildee and Jeff Tippett in his official capacity as treasurer

Friends of Dan Maffei and Herbert Millane in his official capacity as treasurer

Friends of Dick Durbin and Anne Dougherty in her official capacity as treasurer

Friends of Don Beyer and Mary Margaret Whipple in her official capacity as treasurer

Friends of Elizabeth Esty and Patti Flynn-Harris in her official capacity as treasurer

Friends of Estakio and Jay Petterson in his official capacity as treasurer

Friends of Farr and Sidney Slade in her official capacity as treasurer

Friends of Forrest Dunbar and Joe Samaniego in his official capacity as treasurer

Friends of Houghton for Congress and Gregory Paulson in his official capacity as treasurer

Friends of Jared Polis Committee and Edith R. Hooton in her official capacity as treasurer

Friends of Joe Baca 2014 and Joe Baca in his official capacity as treasurer
Friends of John Barrow and Tom Bordeaux in his official capacity as treasurer

Friends of John Delaney and April McClain Delaney in her official capacity as treasurer

Friends of John Sarbanes and Meghan Stumpf in her official capacity as treasurer

Friends of Lois Capps and Andrew Siegel in his official capacity as treasurer

Friends of Mark Sickles and Charles R. Chambers, Jr. in his official capacity as treasurer

Friends of Mark Warner and Gerald S. McGowan in his official capacity as treasurer

Friends of Mary Landrieu, Inc. and Nancy Marsiglia in her official capacity as treasurer

Friends of Michelle and Deborah A. Armstrong in her official capacity as treasurer

Friends of Patrick Murphy and Brian Foucart in his official capacity as treasurer

Friends of Pete Gallego and Anthony Gutierrez in his official capacity as treasurer

Friends of Raj Kittappa and Jesse Fluck in his official capacity as treasurer

Friends of Renteria and Jay Petterson in his official capacity as treasurer

Friends of Rosa Delauro and Patrick Charmel in his official capacity as treasurer

Friends of Roy Cho Inc. and Diane Wexler in her official capacity as treasurer

Friends of Shaughnessy Naughton and Erinn Larkin in her official capacity as treasurer

Friends of Tate MacQueen and Lori Murphy in her official capacity as treasurer
Friends of Terry Adams and Robert D. Tuke in his official capacity as treasurer

Friends of Val Arkoosh and Margaret Sager in her official capacity as treasurer

Friends of Warren Christopher and Leticia Carroll Smith in her official capacity as treasurer

Friends of Wesley Reed and Teresa Klein in her official capacity as treasurer

Fry for Congress and Peggy Stalder in her official capacity as treasurer

Gallardo for Congress and Steve M. Gallardo in his official capacity as treasurer

Gallego for Arizona and Rebecca Wininger in her official capacity as treasurer

Garamendi for Congress and Janica Kyriacopoulos in her official capacity as treasurer

Gaughan for Congress and Lawrence Denis Gaughan in her official capacity as treasurer

Glen Gainer for Congress and Jennifer May in her official capacity as treasurer

Gloria Bromell Tinubu for Congress and Donald L. Fowler in his official capacity as treasurer

Greenstein for Congress and Jennifer May in her official capacity as treasurer

Gutierrez for Congress and Soraida Gutierrez in her official capacity as treasurer

Hagan for US Senate Inc. and Dwight M. Davidson III in his official capacity as treasurer

Halter for Congress and Richard Klumpp in his official capacity as treasurer

Halvorson for Congress and Jim Bush in his official capacity as treasurer
Hanabusa for Hawaii and George S. Yamamoto in his official capacity as treasurer

Hansen Clarke for Congress and Choi Palms-Cohen in her official capacity as treasurer

Harris for Wisconsin and Susan E. Harris in her official capacity as treasurer

Headrick for Congress and Sunny Jewel Murray in her official capacity as treasurer

Herring for Congress and Shaunica Pridgen in her official capacity as treasurer

Hillary Clinton for President and Shelly R. Moskwa in her official capacity as treasurer

Himes for Congress and Kathleen Digennaro Warner in her official capacity as treasurer

Hodges for Congress and Cynthia Nowell in her official capacity as treasurer

Hope for Congress and Elizabeth L. Wildhack in her official capacity as treasurer

Horsford for Congress and Piper Overstreet in her official capacity as treasurer

Houston Barnes for Congress Committee and Brice Barnes in his official capacity as treasurer

Hoyer for Congress and Amy Pritchard in her official capacity as treasurer

Huffman for Congress 2014 and Stacy E. Owens in her official capacity as treasurer

Hughes for Congress and Mark A. Fiore in his official capacity as treasurer

Hutto for US Senate and Rebekah F. Durr in her official capacity as treasurer

Ikaika for Hawaii and Stacey Edralin in her official capacity as treasurer
Jackie McPherson for Congress and Mary Anne Salmon in her official capacity as treasurer

Jackie Speier for Congress and Russell Miller in his official capacity as treasurer

James Lee Witt for Congress and Bob Nash in his official capacity as treasurer

James Mitchell for Congress and Ronnie Devine in his official capacity as treasurer

Janice Hahn for Congress and James Cross official capacity as treasurer

Janice Kovach for Congress and Peter D. Nichols in his official capacity as treasurer

Janis Kent Percefull for Congress and Faith Samantha Sherman in her official capacity as treasurer

Jeff Holmes for Congress and Greg S. Mapes in his official capacity as treasurer

Jeff Merkley for Oregon and Elise Greene in her official capacity as treasurer

Jeffries for Congress and Lenue H. Singletary III in his official capacity as treasurer

Jennifer Garrison for Congress and Russell Garrison in his official capacity as treasurer

Jessica McCall for Congress and Emerson Merkerson in his official capacity as treasurer

Jim Graves for Congress and Peter Donohue in his official capacity as treasurer

Jim Read for Congress and Christi Siver in her official capacity as treasurer

Joanne Dowdell for Congress and Joanne Dowdell in her official capacity as treasurer

Joe Garcia for Congress and Roland Sanchez-Medina in his official capacity as treasurer
Joe Kennedy for Congress and David N. Martin in his official capacity as treasurer

Joe Palumbo for Congress and Keith Buckhout in his official capacity as treasurer

John Carney for Congress and Charles J. Durante in his official capacity as treasurer

John Foust for Congress and Sue Boucher in her official capacity as treasurer

John Lewis for Congress and Michael Collins in his official capacity as treasurer

John Tierney for Congress and George Atkins in his official capacity as treasurer

Julia Brownley for Congress and Jennifer May in her official capacity as treasurer

Kanuth for Congress and Robert Courtney in his official capacity as treasurer

Kaptur for Congress and Thomas Jaffee in his official capacity as treasurer

Karen Bass for Congress and Stephen J. Kaufman in his official capacity as treasurer

Karen Spilka for Congress Committee and Judy Sandra Kalisker in her official capacity as treasurer

Katherine Clark for Congress and Gemma W. Martin in her official capacity as treasurer

Kathleen Rice for Congress and Margaret May in her official capacity as treasurer

Keep Nick Rahall in Congress Committee and Edward Rahall in his official capacity as treasurer

Kelly Westlund for Congress and Larry MacDonald in his official capacity as treasurer

Kevin Strouse for Congress and Ronald L Fader in his official capacity as treasurer
Kind for Congress Committee and Brent Smith in his official capacity as treasurer

Kirkpatrick for Arizona and Daniel A. Flores in his official capacity as treasurer

Korpe for Congress and Satish W. Korpe in his official capacity as treasurer

Koutoujian for Congress and Barbara Foley in her official capacity as treasurer

Kultala for Congress and Carol Marinovich in her official capacity as treasurer

Kurt Schrader for Congress and Jeff A. Green in his official capacity as treasurer

Kuster for Congress, Inc. and Charles Willing in his official capacity as treasurer

Kyrsten Sinema for Congress and Judith Allen in her official capacity as treasurer

Laferla for Congress and Frances Miller in her official capacity as treasurer

Langevin for Congress and Edward A. Giroux in his official capacity as treasurer

Lara for New Mexico and Jennifer May in her official capacity as treasurer

Larson for Congress and Barry Feldman in his official capacity as treasurer

Laura Fjeld for Congress Committee and Deborah Hylton in her official capacity as treasurer

Lavellee for Congress and Ruth Lavallee in her official capacity as treasurer

Lavern Chatman for Congress and Angela Moody in her official capacity as treasurer

Lenda Sherrell for Congress and Richard F. Laroche in his official capacity as treasurer
Levin for Congress and Jeremy Mahrle in his official capacity as treasurer

Loebsack for Congress and Ian J. Russell in his official capacity as treasurer

Lofgren for Congress and Mark B. Fredkin in his official capacity as treasurer

Lois Frankel for Congress and Janica Kyriacopoulos in her official capacity as treasurer

Lopez for Congress and Amy Lewis in her official capacity as treasurer

Louie Minor for Congress and Anna Vazquez in her official capacity as treasurer

Louise Slaughter Re-Election Committee and Nora E. Tuthill in her official capacity as treasurer

Lucille Roybal-Allard for Congress and A. Christian Hart in his official capacity as treasurer

Maguire for Us and Lisa Sciancalepore in her official capacity as treasurer

Malcolm Graham for Congress and Donnie T. Simmons in his official capacity as treasurer

Maloney for Congress and Melissa A. Mendez in her official capacity as treasurer

Marc Veasey Congressional Campaign Committee and Charles G. Langham, III in his official capacity as treasurer

Marcus Brandon for Congress and Cecil Antonio Brockman in his official capacity as treasurer

Margie Wakefield for Congress and Doni Mooberry Slough in his official capacity as treasurer

Marianne Williamson for Congress and Kevin Heneghan in his official capacity as treasurer

Marjorie 2014 and Jennifer May in her official capacity as treasurer
Mark Levine for Congress Inc. and Samson March in his official capacity as treasurer

Mark Pocan for Congress and Sondy Pope in her official capacity as treasurer

Mark Pryor for U.S. Senate and Bob Edwards in his official capacity as treasurer

Mark Takai for Congress and Edward Dion Kaimihana in his official capacity as treasurer

Mark Takano for Congress and Jennifer May in her official capacity as treasurer

Martin Skelly for Congress and Kelly Skelly in her official capacity as treasurer

Mary Ellen Balchunis for Congress and Elizabeth A. Parziale in her official capacity as treasurer

Mary M. Headrick for Congress and Phyllis Brown in her official capacity as treasurer

Mary Rose Wilcox for Congress and Aaron Kizer in his official capacity as treasurer

Matsui for Congress and David K. Murphy in his official capacity as treasurer

Matt for Oklahoma and Erica Silverstein in her official capacity as treasurer

Matt Miller for Congress 2014 and Shelly R. Moskwa in her official capacity as treasurer

Maxey Scherr for US Senate and Silvestre Reyes in his official capacity as treasurer

McAffrey for Congress and John David Stinson in his official capacity as treasurer

McCollum for Congress and Mary Pat Lee in her official capacity as treasurer

McNerney for Congress and Sue Staley in her official capacity as treasurer
<table>
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<tr>
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<th>Name and Office</th>
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<tr>
<td>1</td>
<td>Mike Honda for Congress and Vicki Day in her official capacity as treasurer</td>
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<td>2</td>
<td>Mike Thompson for Congress and Tom Hannigan in his official capacity as treasurer</td>
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<td>3</td>
<td>Monica Vernon for Congress and Robert Rush in his official capacity as treasurer</td>
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<td>Montanans for Lewis and Holly Giarraputo in her official capacity as treasurer</td>
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<td>5</td>
<td>Moore for Alaska and Carolyn H. Covington in her official capacity as treasurer</td>
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<td>6</td>
<td>Moore for Congress and Ellen Bravo in her official capacity as treasurer</td>
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<td>7</td>
<td>Morton for Congress and Linda A. Ward in her official capacity as treasurer</td>
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<td>8</td>
<td>Moulton for Congress and Aaron Bartnick in his official capacity as treasurer</td>
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<td>9</td>
<td>Mowrer for Iowa and Dennis Skinner in her official capacity as treasurer</td>
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<td>10</td>
<td>Nadler for Congress and Lewis Weissman in his official capacity as treasurer</td>
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<td>11</td>
<td>Nancy Najarian for Congress and Michael Stimson in his official capacity as treasurer</td>
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<td>12</td>
<td>Nancy Pelosi for Congress and Steven Swig in his official capacity as treasurer</td>
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<td>13</td>
<td>Natalie Tennant for Senate and Arden J. Curry II in his official capacity as treasurer</td>
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<td>14</td>
<td>Nels Mitchell for Idaho and Susan Eastlake in her official capacity as treasurer</td>
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<td>15</td>
<td>Nick Casey for Congress and Martin Glasser in his official capacity as treasurer</td>
</tr>
<tr>
<td>16</td>
<td>Nita Lowey for Congress and Richard Melnikoff in his official capacity as treasurer</td>
</tr>
</tbody>
</table>
Nolan for Congress Volunteer Committee and James A. Dechaine in his official capacity as treasurer

Norm Mosher for Congress and Samantha Carol Van Saun in her official capacity as treasurer

Nunn for Senate and James S. Grien in his official capacity as treasurer

Obama for America and Martin H. Nesbitt in his official capacity as treasurer

Obermueller for Congress and Joanne Obermueller in her official capacity as treasurer

O'Brien for Iowa and H. Daniel Holm Jr. in his official capacity as treasurer

Orman for U.S. Senate Inc. and Wynne Royce Jennings in his official capacity as treasurer

Pallone for Congress and Warren Goode in his official capacity as treasurer

Pallone for Senate and Peter D. Nichols in his official capacity as treasurer

Pam Byrnes for Congress and Vicki Hopper in her official capacity as treasurer

Parrish for Congress and William F. Schoell in his official capacity as treasurer

Pascrell for Congress and Bernadette McPherson in her official capacity as treasurer

Pat Murphy for Iowa and Vicki Krug in her official capacity as treasurer

Patrick Henry Hays for Congress and Mike Hays in his official capacity as treasurer

Paul Tonko for Congress and Patrick J. Bulgaro in his official capacity as treasurer

Peiser for Congress and Patricia Cratty in her official capacity as treasurer
People for Ben and Carmen Lujan in her official capacity as treasurer

People for Derek Kilmer and Jay Petterson in his official capacity as treasurer

People for Rick Weiland and Beverly Casey in her official capacity as treasurer

Perlmutter for Congress and Karen J. Rokala in her official capacity as treasurer

Pete Aguilar for Congress and Jennifer May in her official capacity as treasurer

Peter Clemens for Congress and Tammy Clemens in her official capacity as treasurer

Peters for Michigan and Geraldine Buckles in her official capacity as treasurer

Peterson for Congress and Elliott A. Peterson in his official capacity as treasurer

Pingree for Congress and Anne Rand in her official capacity as treasurer

Poetter for Congress and Kelly A. Marks in her official capacity as treasurer

Quigley for Congress and Erica Kelly in her official capacity as treasurer

Rangel for Congress and David A. Paterson in his official capacity as treasurer

Reed Committee and Elizabeth R. Young in her official capacity as treasurer

Re-Elect McGovern Committee and William T. Talcott in his official capacity as treasurer

Richard Bolger for Congress and James B. Veltri in his official capacity as treasurer

Richmond for Congress and Maple Gaines in her official capacity as treasurer
Rick Wade for Senate and G. Hubbard Smalls in his official capacity as treasurer

Ringo for Congress - Idaho Congressional District 1 and Ron Beitelspacher in his official capacity as treasurer

Ritchie for Congress and Abbot Taylor in his official capacity as treasurer

Ro for Congress Inc. and Reena Roa in her official capacity as treasurer

Rob Joswiak for Congress and Zack Byrnes in his official capacity as treasurer

Rob Zerban for Congress 2014 and Randy Bryce in his official capacity as treasurer

Robin Kelly for Congress and Ryan Vanmeter in his official capacity as treasurer

Robles for Congress and Silvia Castro in her official capacity as treasurer

Romanoff for Congress and Michael Hamrick in his official capacity as treasurer

Ron Barber for Congress and Laura T. Almquist in her official capacity as treasurer

Ron Leach for Congress Committee and Theresa Drake in her official capacity as treasurer

Ruben Hinojosa for Congress and Vickie Winpisinger in her official capacity as treasurer

Rudy Hobbs for Congress and Brandon Asberry in his official capacity as treasurer

Rush Holt for Senate and Robert J. Del Tufo in his official capacity as treasurer

Russ for Congress and Carol S. Warner in her official capacity as treasurer

Sanford Bishop for Congress and Evelyn Turner Pugh in her official capacity as treasurer
| 1 | Schatz for Senate and Keith Amemiya in his official capacity as treasurer |
| 2 | Schertzing for Congress and Mary Ruttan in her official capacity as treasurer |
| 3 | Schiff for Congress and Stephen Kaufman in his official capacity as treasurer |
| 4 | Schneider for Congress and Mark A. Levy in his official capacity as treasurer |
| 5 | Schwartz for Congress and Daniel Ciccarello in his official capacity as treasurer |
| 6 | Scott Brion for Congress and Eric J. Loudenslager in his official capacity as treasurer |
| 7 | Scott for Congress and Sean M. Williamson in his official capacity as treasurer |
| 8 | Scott Peters for Congress and Nicholas R. Femia in his official capacity as treasurer |
| 9 | Sean Eldridge for Congress and Michael Oates in his official capacity as treasurer |
| 10 | Sean Patrick Maloney for Congress and Holly Giarraputo in her official capacity as treasurer |
| 11 | Shaheen for Senate and Kathleen H. Goode in her official capacity as treasurer |
| 12 | Sharon Sund for Congress and Eugene Roberson in his official capacity as treasurer |
| 13 | Sheila Oliver for US Senate and Jennie Oliver in her official capacity as treasurer |
| 14 | Sherman for Congress and Stephen J. Kaufman in his official capacity as treasurer |
| 15 | Sherzan for Iowa and Susan Sherzan in her official capacity as treasurer |
| 16 | Sinner for Congress and Jon Ewen in his official capacity as treasurer |
1 Skinner for Congress '14 and Charles Joseph
2 Skinner in his official capacity as treasurer
3 Sona Mehring for Congress and Shawn Hunter in
4 his official capacity as treasurer
5 Stallings for Idaho and Cary Jones in his official
6 capacity as treasurer
7 Stanley Chang for Congress and Nathan Okubo in
8 his official capacity as treasurer
9 Stephen Lynch for Congress and Brian Miller in his
10 official capacity as treasurer
11 Stephen Lynch for Senate and Brian Miller in his
12 official capacity as treasurer
13 Steve Cohen for Congress and Henry M. Turley in
14 his official capacity as treasurer
15 Steve Israel for Congress Committee and Harris
16 Wiener in his official capacity as treasurer
17 Stocker in Congress and Chuck Banks in his official
18 capacity as treasurer
19 Supporters of Shayan for Congress and Shayan H.
20 Modarres in his official capacity as treasurer
21 Susan Grettenberger for Congress and Isaac
22 Francisco in his official capacity as treasurer
23 Suzanne Patrick for Congress and Suzanne Patrick
24 in her official capacity as treasurer
25 Swalwell for Congress and Shannon Fuller in her
26 official capacity as treasurer
27 Swati Dandekar for Congress and Dennis J.
28 Naugthon in his official capacity as treasurer
29 Taylor for US Senate and Victor Russell Petty III in
30 his official capacity as treasurer
31 Ted Deutch for Congress Committee and Jeffrey
32 Weinstock in his official capacity as treasurer
Terri Sewell for Congress and Edward A. Hosp in his official capacity as treasurer

Texans for Henry Cuellar Congressional Campaign and Rosendo Carranco in his official capacity as treasurer

The Bill Keating Committee and David A. Doucette in his official capacity as treasurer

The Markey Committee and Marie C. Carbone in her official capacity as treasurer

The Niki Tsongas Committee and Zoila Gomez in her official capacity as treasurer

Tim Bishop for Congress and Molly Bishop in her official capacity as treasurer

Tim Ryan for Congress and Allen Ryan in his official capacity as treasurer

Tim Walz for US Congress and Gerald Maschka in his official capacity as treasurer

Titus for Congress and Jennifer May in her official capacity as treasurer

Toi for Illinois and Susan Jenkins in her official capacity as treasurer

Tony Cardenas for Congress and David Gould in his official capacity as treasurer

Trammell for Congress and David J. Irving in his official capacity as treasurer

Trivedi for Congress and Bret Binder in his official capacity as treasurer

Troy Jackson for Congress and Alan Lindquist in his official capacity as treasurer

Tulsi for Hawai‘i and Talia Tamayo Khurana in her official capacity as treasurer

Udall for Colorado and Ellen Marshall in her official capacity as treasurer
Udall for Us All and Carolyn Gonzales in her official capacity as treasurer

Van Hollen for Congress and Stacey Maud in her official capacity as treasurer

Vanderstelt for Congress and Deanna Taylor in her official capacity as treasurer

Vincent Gregory for Congress and Harold M. Montgomery in his official capacity as treasurer

Visclosky for Congress and Michael Malczewski in his official capacity as treasurer

Walrond for Congress and Torian J. Robinson in his official capacity as treasurer

Walsh for Montana and Holly Giarraputo in her official capacity as treasurer

Welch for Congress and John C. Candon in his official capacity as treasurer

Weldon Russell for Congress Campaign Committee and Bridget Herbert in her official capacity as treasurer

Wendy Greuel for Congress and Stephen J. Kaufman in his official capacity as treasurer

Wes Neuman for Congress and Linda Neuman in her official capacity as treasurer

Will Brownsberger for Congress and David Merfeld in his official capacity as treasurer

Yarmuth for Congress and Sarah J. Martin in her official capacity as treasurer