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March 15, 2016

Via Electronic Mail

Mr. Jeff S. Jordan
 Federal Election Commission
 Office of Complaints Examination
 and Legal Administration
 999 E. Street, NW
 Washington, DC 20436

Re: MUR 7011

Dear Mr. Jordan:

I have been retained by Feel the Bern Committee, have reviewed the above-referenced complaint filed by Hillary for America ("HFA") and submit the following in response.

First, HFA begins by claiming that Hillary Clinton 4 President ("HC4P") is "falsely and fraudulently claim it is authorized by Secretary Clinton or Hillary for America." Just one paragraph later, HFA acknowledges that "HC4President registered with the Federal Election Commission "FEC") on January 19, 2016 as an *unauthorized presidential committee* supporting Secretary Clinton" noting the "FEC Committee ID: C00605204." (emphasis added). While these claims are obviously inconsistent, it seems most of HFA's complaints are directed not at Feel the Bern Committee, but at HC4P.

Feel the Bern was made aware of emails that went out to some individuals donating to HC4P. After an inquiry, Feel the Bern discovered that there was a glitch for a brief period of time that caused donations made to HC4P result in response emails originating from info@feelbern.org. This was not due to any action by Feel the Bern, and has since been corrected. When HC4P was formed, its website was designed and created by the same internet consultant that designed my client's website - feelbern.org. While the response email makes it appear that the donated funds were deposited with Feel the Bern, they were in fact deposited to HC4P. The error was in the email coding which was improperly copied from the consultant's earlier project; no funds were ever misapplied. The use of the same consultant also contributes to the similar look and feel of the website noted by HFA.

HFA next complains that the PayPal website claimed to be encouraging individuals to make a "Donation to [the] Hillary Clinton Campaign." This is not an issue that is applicable to Feel the Bern, and is more properly addressed to HC4P.

HFA alludes without specificity to the fact that HC4P appears "as the first and second potential link in the Google search results" as supporting its position of HC4P being fraudulent. Such ads do not require the full disclaimer as required by 11 CFR 110.11¹ and are not otherwise

¹ See AO 2010-19

Mr. Jeff Jordan
March 15, 2016
Page 2 of 2

prohibited. In fact, in HFA's Exhibit G, one can see that both HFA and berniesanders.com, the official website of his campaign, have similar advertisements. Again, it is unclear why HFA is directing these complaints, such as they are, toward Feel the Bern, and not HC4A.

Donations made to Feel the Bern have always been used as permitted. While several contractors made some mistakes when the website first launched, all mistakes have since been corrected. It is important to note that no funds donated to HC4P ever were mistakenly allocated to Feel the Bern; the mistake only effected the reply email for a brief period of time.

Please feel free to contact me if you have any questions.

Sincerely,



JOSEPH F. CENTRICH

JFC/yd

cc: Mrs. Grace Rogers