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2016 NOV -7 PM 2:44

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November 7, 2016

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Raymond Hulser
Chief, Public Integrity Section
Department of Justice, Criminal Division
Bond Building, 12th Floor
1400 New York Avenue, NW
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MUR # 7194

Joseph Gonzalez
Federal Bureau of Investigation, Public Corruption Unit
935 Pennsylvania Ave, NW, Room 3973D
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RECEIVED
FEDERAL ELECTION
COMMISSION
2016 NOV -7 PM 4:03
OFFICE OF GENERAL
COUNSEL

Lisa J. Stevenson
Acting General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463
lstevenson@fec.gov

Re: Fraudulent Campaign Solicitations

Dear Messrs. Hulser & Gonzalez, and Ms. Stevenson:

We serve as General Counsel to Hillary for America (the "Committee"), the authorized presidential campaign of Secretary Hillary Clinton. It has recently come to the attention of the Committee that the operator(s) of a website, www.votehillaryonline.com, are engaged in a massive, nationwide effort to undermine the integrity of the electoral process and confuse voters into believing that they are casting valid ballots for Secretary Clinton through the website. The operator(s) are also committing fraud by collecting money for themselves while claiming to raise money for Secretary Clinton's campaign in clear violation of 52 U.S.C. § 30124 and 18 U.S.C. § 1343. We request that you investigate this matter and take all appropriate action as soon as possible.

The fraudulent website falsely informs supporters that they may cast a ballot in support of Secretary Clinton through the website. By clicking on the "I'm with her" button at the top of the website, a visitor to the site is brought to a form that indicates that:

November 7, 2016

Page 2

Submitting this form will place your vote for the Hillary Clinton - Tim Kaine ticket. Please check your details carefully as incorrect details will not create a warning and your vote will be counted, the votes collected here are passed directly to the state for verification and counting.

The form asks individuals to provide their first and last name, state, address, state ID or driver's license number, and email. A button at the bottom of this page states "Place vote for Hillary Clinton." The unmistakable purpose of this page is to suggest that supporters have cast a valid ballot by submitting this information online, and that no further action (e.g., visiting a polling place on election day or submitting an absentee ballot) is required in order to vote. This is a pernicious attempt to confuse voters and undermine the integrity of the electoral process. The sophistication of this page and its significant degree of resemblance to the Committee's actual website leaves the distinct impression that the website's operator(s) are attempting to suppress the number of voters that cast ballots for Secretary Clinton.

The website referenced above is a sophisticated reproduction of the Committee's actual website, www.hillaryclinton.com/. The fraudulent website displays campaign imagery, the Committee's logo, and the Committee's disclaimer. The font and color scheme are identical to that of the Committee website. Yet, the Committee did not create the fraudulent website or authorize any other person or entity to create it. Of particular concern is the fundraising function of the fraudulent website; it is unclear where contributions made through this website will be routed. The Committee has never authorized the sponsor(s) of www.votehillaryonline.com to raise funds on its behalf, contracted with the website to perform any type of service, or received funds raised through this portal. The Committee is also concerned about the prospect that the operator(s) of the fraudulent website will obtain personal information of website visitors. The sponsor(s) of the website are engaged in a blatantly illegal attempt to defraud supporters by masquerading as the Committee.

Pursuant to 52 U.S. C. § 30124(b), "[n]o person shall (1) fraudulently misrepresent the person as speaking, writing, or otherwise acting for or on behalf of any candidate or political party or employee or agent thereof for the purpose of soliciting contributions or donations; or (2) willfully and knowingly participating in or conspire to participate in any plan, scheme, or design to violate paragraph (1)." It is plain that the operators of this website are willfully engaged in fraudulently misrepresenting themselves to solicit funds in violation of law. Further, the activity clearly constitutes a "scheme or artifice to defraud [] by means of false or fraudulent pretenses, representations, or promises" by wire in interstate commerce, in violation of Section 1343 of the federal criminal code.

In order to safeguard the integrity of the electoral process and protect supporters from fraud, we respectfully request that you take steps to put an end to these crimes, undertake a full investigation of this matter, and promptly take all other steps to seek appropriate judicial relief to prevent future harm to the Committee and the credibility of the electoral process.

November 7, 2016

Page 3

Please do not hesitate to contact us if you have any questions or need further information.

Very truly yours,



Marc Erik Elias
Graham M. Wilson
David J. Lazarus
Counsel to Hillary for America

DISTRICT OF COLUMBIA

Subscribed and sworn to before me
this 7th day of November, 2016.



Notary Public

My Commission Expires: Dec. 14, 2019



JUDITH LEIGH CASEY
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires December 14, 2019