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June 30, 2017

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CELA

VIA EMAIL & HAND DELIVERY

Jeff S. Jordan, Esq.
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
999 E Street NW
Washington, DC 20463

Re: MUR 7243 – 58th Presidential Inaugural Committee

Dear Mr. Jordan:

We represent the 58th Presidential Inaugural Committee ("PIC") in the above-captioned Matter Under Review ("MUR").

We have reviewed the complaint filed by Free Speech for People on April 26, 2017 (the "Complaint"). The Complaint alleges that PIC knowingly accepted a donation from a foreign national in violation of the Federal Election Campaign Act of 1971, as amended (the "Act" or "FECA"), and Federal Election Commission (the "Commission" or "FEC") regulations.

The Complaint rests entirely on erroneous and speculative allegations. As explained below, the Complaint fails to offer any credible evidence that PIC "knowingly" accepted a foreign national donation by accepting a donation from Citgo Petroleum Corporation ("Citgo"). It was PIC's practice to carefully screen potential corporate donations for legal compliance purposes. Consistent with this practice, PIC reviewed Citgo's donation, confirmed that Citgo was not a foreign national under the Act, and found no other facts that would lead a reasonable person to question the source and legality of the funds that Citgo used to make the donation. Moreover, the sworn declaration of Heather Martin, PIC's Director of Budget and Treasury, and documentation accompanying this submission directly refute the Complaint's specious allegation that PIC "knowingly" accepted a donation from a foreign national.

In light of the foregoing, the Commission should find no reason to believe PIC violated the Act or Commission regulations and should promptly dismiss this matter.



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FACTS

In November 2016, then President-elect Trump appointed PIC to serve as his inaugural committee. *See* PIC, Initial Letter-Filing (filed with the FEC on Nov. 29, 2016). PIC was responsible for planning the 58th Presidential inaugural ceremony held on January 20, 2017 as well as functions and activities connected with the inaugural ceremony, such as the inaugural parade, official inaugural balls, and welcome celebrations. *See* 36 U.S.C. § 501; 11 C.F.R. § 104.21(a)(1).

To finance these activities, PIC raised approximately \$106.7 million from private donations, inaugural ball ticket sales, and commemorative license plate sales. *See* PIC, Report of Donations Accepted for Inaugural Committees (filed with the FEC on Apr. 18, 2017). PIC's fundraising materials included a disclaimer stating "Contributions from foreign nationals, including foreign corporations are prohibited." *See, e.g.*, Exhibit A (PIC \$500,000 Underwriter Package Benefits Document); Exhibit B (Screenshot of PIC Ticketing Website); Exhibit C (Screenshot of PIC Commemorative License Plate Website).

It was PIC's practice to carefully screen potential corporate donations for legal compliance purposes. *See* Decl. of Heather Martin ¶ 3 ("Martin Decl.") (Exhibit D). Specifically, it was PIC's practice to confirm that: (1) the corporation was incorporated in the United States.; (2) the corporation maintained its principal place of business in the United States; (3) the corporation provided a United States address with the donation; and (4) the donation was drawn on a United States bank account. *Id.*

On December 22, 2016, PIC received a wire transfer in the amount of \$500,000 from Citgo. *Id.* ¶ 4; Exhibit E (PIC Bank Statement). Consistent with its policy of thoroughly vetting potential corporate donations, PIC screened Citgo's donation by reviewing the wire transfer information and conducting its own independent research. Martin Decl. ¶ 5. The wire transfer listed "Citgo Petroleum Corporation" at "1293 Eldridge Parkway, Suite 3040, Houston, Texas, 77077" as the transferor. *Id.*; Exhibit E. PIC also confirmed that "Citgo Petroleum Corporation" was incorporated in the United States and that its corporate headquarters was in Houston, Texas at the same address provided with the wire transfer. Martin Decl. ¶ 5; Exhibit F (Screenshot of Delaware Secretary of State Entity Database); Exhibit G (Screenshot of Citgo's Website). Finally, PIC confirmed with a representative from its bank that the wire transfer originated from an account at the Bank of Texas, which is a United States financial institution. Martin Decl. ¶ 5.



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THE LAW

I. FEC Regulation of Inaugural Committees

An “inaugural committee” is “the committee appointed by the President-elect to be in charge of the Presidential inaugural ceremony and functions and activities connected with the ceremony.” 36 U.S.C. § 501; 11 C.F.R. § 104.21(a)(1). Although referred to as a “committee,” an inaugural committee is not a “political committee” under the Act or Commission regulations because it does not raise or spend funds in connection with federal elections. *See* Advisory Opinion 1980-144 (Presidential Inaugural Committee) at 2 (Jan. 9, 1981) (“Funds received and expended by the Committee are used to finance inaugural activities rather than any Federal election. Accordingly, because the Committee does not and will not receive any ‘contribution’ or make any ‘expenditure’ it is not a political committee for purposes of the Act and Commission regulations . . .”).

Prior to the Bipartisan Campaign Reform Act of 2002 (“BCRA”), which amended FECA, inaugural committees were “not subject to the limitations, prohibitions, and reporting requirements of the Act.” *See id.* BCRA section 308 established limited reporting requirements for inaugural committees and, as discussed below, also created a narrowly tailored prohibition against inaugural committees accepting donations from foreign nationals. *See* 36 U.S.C. § 510. Post-BCRA, inaugural committees continue to be permitted to accept unlimited donations from individuals, corporations, labor organizations, national banks, and federal government contractors. *See* Advisory Opinion 1980-144 at 2.

II. Prohibition on Foreign National Donations to Inaugural Committees

BCRA section 308 provides that an inaugural committee “shall not accept any donation from a foreign national.”¹ 36 U.S.C. § 510(c). Commission regulations,

¹ A “foreign national” is “an individual who is not a citizen of the United States or a national of the United States . . . and who is not lawfully admitted for permanent residence.” 52 U.S.C. § 30121(b)(2). The term “foreign national” also includes “a government of a foreign country” as well as “a partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country.” 22 U.S.C. § 611(b)(1), (3); 52 U.S.C. § 30121(b)(1). Thus, as a matter of law, a U.S. corporation that is owned or controlled by a foreign national is not itself a foreign national, provided the corporation is organized under the laws of the United States and has its principal place of business within the United States. *See id.*; *see also* Advisory Opinions 2009-14 (Mercedes-Benz USA/Sterling), 2006-15 (TransCanada), 2004-42 (Pharmavite), 2000-17 (Extendicare), 1999-28 (Bacardi-Martin), 1995-



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in turn, provide that “[n]o person shall knowingly accept from a foreign national any donation to an inaugural committee.” 11 C.F.R. § 110.20(j).

“[A]lthough BCRA section 308 does not expressly include a ‘knowingly’ standard for inaugural committees’ acceptance of donations from foreign nationals,” Commission regulations “prohibit[] only *knowing* acceptance of a donation from a foreign national.” *Presidential Inaugural Committee Reporting and Prohibition on Accepting Donations from Foreign Nationals*, 69 Fed. Reg. 59,775, 59,778 (Oct. 6, 2004) [hereinafter “*Presidential Inaugural Committees*”] (emphasis in original). The Commission inserted a “knowingly” standard into the regulation implementing BCRA section 308 because it “ha[d] previously read a ‘knowingly’ standard into other statutory provisions banning acceptance of foreign national contributions and donations by other persons” and chose “to provide inaugural committees with the same protection.” *Id.* The Commission’s rationale for doing so was that “it would be fundamentally unjust to assess liability on the part of a fundraiser or recipient committee that solicits or receives a contribution if the contribution in fact appears to be from a legal source, especially if initial screen efforts resulted in specific assurances of the contribution’s legality.” MUR 4530 (Democratic National Committee, *et al.*), Statement of Reasons of Commissioner Scott E. Thomas at 3 (Sept. 18, 2002) (cited in *Contribution Limitations and Prohibitions*, 67 Fed. Reg. 69,928, 69,940-41 (Nov. 19, 2002) and MUR 6078 (Obama for America), Factual & Legal Analysis at 11 n.6 (Sept. 7, 2010)).

A person “knowingly” accepts a foreign national donation if one of three knowledge standards are satisfied: (1) actual knowledge; (2) reason to know; or (3) willful blindness. *See* 11 C.F.R. § 110.20(a)(4); *Contribution Limitations and Prohibitions*, 67 Fed. Reg. at 69,941. Each of these three knowledge standards “focus on the source of the funds at issue.” *Id.* “The source of the funds may or may not be the putative . . . donor who provides a check or other negotiable instrument to a . . . committee; rather, the source would be the person or persons who originated the . . . donation, even if it passed through the hands or accounts of a U.S. citizen or permanent resident.” *Id.*

(Continued . . .)

15 (Allison Engine PAC), 1992-16 (Nansay Hawaii), 1990-08 (CIT), 1989-29 (GEM), 1989-20 (Kuulima), 1985-3 (Diridon), 1983-31 (Syntex), 1983-19 (AMAX), 1982-34 (Sonat), 1982-10 (Syntex), 1980-100 (Revere Sugar), 1978-21 (Budd Citizenship Committee).



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Under the first knowledge standard, a person must have "actual knowledge that the source of the funds solicited, accepted, or received is a foreign national." 11 C.F.R. § 110.20(a)(4)(i).

Under the second knowledge standard, a person must "[b]e aware of facts that would lead a reasonable person to conclude that there is a substantial probability that the source of the funds solicited, accepted, or received is a foreign national." *Id.* § 110.20(a)(4)(ii). "Substantial probability means that there is a considerable likelihood that the donor is a foreign national. . . . This is, in effect, a 'reason to know' standard under which a person should have acted as though a fact existed until it could be proven otherwise." *Contribution Limitations and Prohibitions*, 67 Fed. Reg. at 69,941 (citing Restatement (Second) of Agency, sec. 9, cmt. d (1958)).

Under the third knowledge standard, a person must "[b]e aware of facts that would lead a reasonable person to inquire whether the source of the funds solicited, accepted, or received is a foreign national, but the person failed to conduct a reasonable inquiry." 11 C.F.R. § 110.20(a)(4)(iii). "This third standard is in effect willful blindness, which is applicable to situations in which a known fact should have prompted a reasonable inquiry, but did not." *Contribution Limitations and Prohibitions*, 67 Fed. Reg. at 69,941.

"[C]ategories of facts that are . . . illustrative of the types of information that should lead a recipient to question the origin of a contribution or donation under" the reason to know and willful blindness knowledge standards include:

- The donor uses a foreign passport or passport number for identification purposes;
- The donor provides a foreign address;
- The donor makes a donation by means of a check or other written instrument drawn on a foreign bank account or by a wire transfer from a foreign bank; or
- The donor resides abroad.

Id.; 11 C.F.R. § 110.20(a)(5). "Failure to conduct a reasonable inquiry in the face of any of these facts constitutes evidence of a knowing violation of the Act." *Contribution Limitations and Prohibitions*, 67 Fed. Reg. at 69,941.



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DISCUSSION

The Complaint concocts an elaborate conspiracy theory to justify its claim that PIC “knowingly” accepted a foreign national donation from Citgo. Relying only on three asserted facts—Citgo is the subsidiary of a foreign parent corporation, foreign nationals sit on Citgo’s board of directors, and historical news articles reporting that foreign nationals may have been involved in certain Citgo charitable and public relations activities in the past—the Complaint blithely presumes that PIC *must* have “knowingly” accepted a donation from a foreign national. *See* Compl. ¶¶ 36-38. The Complaint does not offer any facts specifically related to PIC’s acceptance of Citgo’s donation, let alone any facts specifically related to Citgo’s decision to donate to PIC. The Complaint thereby falls far short of the “reason to believe” threshold and should be dismissed on this basis alone.

In any event, the sworn declaration and documentation accompanying this submission directly refute the Complaint’s allegation that PIC “knowingly” accepted a foreign national donation under FECA and Commission regulations. PIC’s acceptance of a donation from a United States subsidiary of a foreign parent corporation followed not only the practices of prior inaugural committees,² but also the provisions of federal campaign finance law. In adherence with Commission regulations, PIC carefully screened potential corporate donations, including Citgo’s donation, for “red flags” that would prompt a reasonable person to inquire about the source of the corporate donor’s funds. Although not required by Commission regulations, PIC also took the necessary steps to confirm that corporate donors, including Citgo, were not foreign nationals. Following PIC’s internal due diligence, there was no indication that Citgo’s donation originated from a foreign national and PIC, therefore, appropriately accepted the donation. In light of the foregoing, there is no evidence that PIC “knowingly” accepted a donation from a foreign national and, accordingly, the Complaint should be dismissed.

² For example, Presidential Inaugural Committee 2013 accepted several donations from United States subsidiaries of foreign parent companies (*e.g.*, Azteca America, Genentech, Strax Americas, TracFone Wireless) as did the 55th Presidential Inaugural Committee (*e.g.*, DaimlerChrysler, HSBC USA, GlaxoSmithKline, Novartis Finance Corporation, Teva Pharmaceuticals).



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I. The Complaint fails to meet the “reason to believe” threshold and should be dismissed on this basis alone.

The Complaint alleges that PIC “knowingly accept[ed] a donation made by a foreign national,” Compl. ¶¶ 36-38, but fails to “set[] forth specific facts, which, if proven true, would constitute such a violation” of the Act, MUR 4960 (Hillary Rodham Clinton for U.S. Senate Exploratory Committee), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, and Bradley A. Smith at 1 (Dec. 21, 2000). As such, the Complaint consists of nothing more than “[u]nwarranted legal conclusions from asserted facts” and “mere speculation,” which the Commission has explained “will not be accepted as true.” *Id.* at 2.

First, the Complaint does not identify any specific facts which, if proven true, would transform an otherwise lawful donation from Citgo into a donation from a foreign national. The Complaint claims that Citgo’s donation to PIC is unlawful because, “[o]n information and belief, at least part of the decisions concerning [Citgo’s] donation and disbursement were made by” foreign nationals.³ Compl. ¶ 34. According to the Complaint, foreign nationals *must* have been involved in Citgo’s decision to donate to PIC because Citgo is ultimately owned by a foreign national corporation, foreign nationals sit on Citgo’s board of directors, and news stories have reported that certain charitable and public relations activities undertaken by Citgo years ago may have involved foreign nationals. *Id.* ¶¶ 8-10, 16-19. None of these alleged facts, however, provide any evidence of the involvement of foreign nationals in Citgo’s decision to donate to PIC.⁴ The

³ Significantly, the Complaint does not even attempt to allege that the source of the funds Citgo used to donate to PIC originated from a foreign national.

⁴ The Commission has routinely dismissed complaints, such the current complaint, that relied on general observations or speculation about an entity’s internal operations, but did not set forth specific facts about the particular activities or transactions at issue. *See, e.g.*, MUR 7070 (Congressional Leadership Fund), Factual & Legal Analysis (Dec. 19, 2016) (explaining that an ambiguous statement in a news article about a political committee’s internal operations was insufficient to find reason to believe that a federal officeholder established, financed, maintained or controlled the political committee); MUR 6959 (Democratic National Committee), Factual & Legal Analysis (Oct. 26, 2016) (finding no reason to believe that a foreign national intern participated in the Democratic National Committee’s decision-making processes when the complaint relied on “news articles [that] do not describe the substance of her work with any particularity”); MUR 5866 (Conrad Burns), Factual & Legal Analysis (June 27, 2007) (dismissing a complaint’s allegations as “tenuous,” “unconvincing,” and “based wholly on speculation” because the complaint “contain[ed] no first-hand information” and “[did] not identify any contributors . . . that may have been reimbursed” by their employer); MUR 5830 (U.S.-Cuba Democracy PAC), Factual & Legal



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Complaint thus fails to set forth *any* facts demonstrating that Citgo's donation was "from a foreign national."⁵

Second, even if the Complaint had sufficiently alleged that Citgo's donation was from a foreign national, the Complaint does not identify any specific facts which, if proven true, would establish that PIC "knowingly" accepted such a donation. The Complaint speculates that, "[o]n information and belief, key personnel of [PIC] understood that Citgo is generally known to be controlled by the Venezuelan government in political matters." Compl. ¶ 38. The Complaint does not identify any sources to support this assertion.⁶ Instead, the Complaint appears to impute such knowledge to PIC based solely on press reports that certain charitable and public relations activities undertaken by Citgo years ago might have involved foreign nationals. Needless to say, the mere existence of press reports concerning possible foreign national involvement in certain charitable and public relations activities previously undertaken by Citgo is not at all probative to the question of whether PIC "knowingly" accepted a foreign national donation from Citgo under FEC regulations.

(Continued . . .)

Analysis (June 13, 2007) (rejecting as "purely speculative" a complaint's allegation that "[i]t strains credulity beyond the breaking point to believe" that a foreign national who founded a nonprofit organization "played no role whatsoever in the decision to establish" a related PAC "and has had no role whatsoever in the contribution and administrative decisions of the [PAC] since it was established").

⁵ Citing three press articles published shortly after PIC filed its disclosure report with the FEC, the Complaint claims that it was "widely understood by the U.S. media" that Citgo's "donation was directed from Venezuela, by PDVSA management and perhaps Venezuelan government officials." Compl. ¶ 27. However, the cited press articles are essentially editorials that characterize Citgo's donation as being from the Venezuelan government simply because Citgo is a subsidiary of Venezuela's state oil company. The press articles do not actually state that anyone from Venezuela directed Citgo to donate to PIC. As multiple commissioners have observed in the past, "allegations based upon unsworn news reports, anonymous sources, and an author's summary conclusions and paraphrases provide questionable legal basis to substantiate a reason to believe finding." MUR 6661 (Robert E. Murray, *et al.*), Statement of Reasons of Chairman Matthew S. Peterson and Commissioners Caroline C. Hunter and Lee E. Goodman at 7 (June 2, 2016).

⁶ "Statements which are not based on personal knowledge should be accompanied by an identification of the source of information which gives rise to the complainant[']s belief in the truth of such statements." 11 C.F.R. § 111.4(d)(2).



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Because the Complaint consists of nothing more than the type of rank speculation and specious claims that the Commission has previously concluded fail to meet the "reason to believe" threshold, the Commission should dismiss the Complaint on this basis alone.

II. PIC did not "knowingly" accept a foreign national donation.

The Complaint urges the Commission to find reason to believe that PIC knowingly accepted a foreign national donation from Citgo. Compl. ¶¶ 36-38. However, the Complaint fails to address the definition of "knowingly" in Commission regulations.⁷

The three knowledge standards set forth in 11 C.F.R. § 110.20(a)(4) "focus on the source of the funds at issue," not on potential behind-the-scenes involvement of foreign nationals. *Contribution Limitations and Prohibitions*, 67 Fed. Reg. at 69,941. The Commission has never required recipients to investigate or inquire about a donor's decision-making process before deciding whether to accept a contribution or donation. But even if there were such a duty, the facts surrounding Citgo's donation would not have prompted such additional scrutiny by PIC. A corporate donor's status as a domestic subsidiary of a foreign parent company, the presence of foreign nationals on a corporate donor's board of directors, and the lawful involvement of foreign nationals in a subsidiary's charitable and public relations activities conducted years ago are not *prima facie* evidence that a potential donation from the corporation is unlawful under FECA. Over the past four decades, the Commission has repeatedly affirmed that U.S. subsidiaries are not automatically barred from participating in elections simply because they are owned or controlled by foreign nationals. See, e.g., *Contribution Limitations and Prohibitions*, 67 Fed. Reg. at 69,943-44; see also *supra* note 1.

Moreover, as the declaration and documentation accompanying this submission demonstrate, PIC did not "knowingly" accept a foreign national donation under Commission regulations. Specifically, PIC did not "[h]ave actual knowledge that the source of the funds . . . accepted . . . is a foreign national." 11 C.F.R.

⁷ The Complaint incorrectly states that, in the context of 11 C.F.R. § 110.20(j), "knowingly" is defined by case law. Compl. ¶ 28 n.20. However, the Commission specifically defined "knowingly" at 11 C.F.R. § 110.20(a)(4) to apply to FECA's various foreign national restrictions, including 11 C.F.R. § 110.20(j). *Presidential Inaugural Committees*, 69 Fed. Reg. at 59,778 ("[P]aragraph (j) prohibits only *knowing* acceptance of a donation from a foreign national. 'Knowingly' is defined in 11 CFR 110.20(a)." (emphasis in original)).



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§ 110.20(a)(4)(i). During its due diligence screening process, PIC rightly concluded that Citgo was not a “foreign national.” *See* Martin Decl. ¶ 5. In addition, the “reason to know” and “willful blindness” standards were not triggered because PIC was not “aware of facts that would lead a reasonable person to conclude there is a substantial probability that the source of the funds . . . accepted . . . is a foreign national” or “would lead a reasonable person to inquire whether the source of the funds . . . accepted . . . is a foreign national.” 11 C.F.R. § 110.20(a)(4)(ii), (iii). PIC screened all potential corporate donations, including Citgo’s donation, for the presence of “red flags” that Commission regulations state should prompt a reasonable inquiry into the source of the funds used to make the donation. *See id.* § 110.20(a)(5); Martin Decl. ¶¶ 3, 5. None of those facts was present with respect to Citgo’s donation. Citgo provided a U.S. address with its donation, the donation was drawn on a U.S. bank account, and Citgo’s corporate headquarters is located in Houston, Texas. Martin Decl. ¶ 5. PIC’s corporate donation vetting policies exceeded the minimum due diligence requirements in Commission regulations, as PIC also proactively confirmed that corporate donors were not foreign nationals. *Id.* ¶ 3. Here, PIC duly confirmed that Citgo was not a foreign national because the company was incorporated in the United States and maintained its principal place of business in Houston, Texas. *Id.* ¶ 5.

As detailed above, PIC carefully screened Citgo’s donation in compliance with FEC regulations, and there was no indication that Citgo’s donation originated from a foreign national. In light of the foregoing, there is no reason to believe that PIC “knowingly” accepted a foreign national donation under FECA and Commission regulations.

CONCLUSION

For all of the reasons set forth above, the Commission should find there is no reason to believe a violation occurred and should promptly dismiss this matter.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Michael E. Toner".

Michael E. Toner
Brandis L. Zehr

Exhibit A



58TH PRESIDENTIAL INAUGURAL COMMITTEE UNDERWRITER BENEFITS TUESDAY, JANUARY 17 – SATURDAY, JANUARY 21, 2017

Priority Booking at Select Inaugural Hotel(s)

You and your designees will receive priority booking for up to four hotel rooms. Rooms will be at your own expense, require a four-night minimum stay, and reserved on a first-come, first-served basis.

Exclusive Inaugural Event for \$500,000+ Underwriters

You and your designees will receive the following allotment of tickets to a special inaugural event:

- Vice President's Dinner – 2 Tickets
An intimate dinner with Vice President-elect Mike Pence and Mrs. Karen Pence

Tickets to Official Inaugural Events

You and your designees will receive the following allotment of tickets to official inaugural events:

- Victory Reception – 4 Tickets
An entertainment-filled welcome reception
- Candlelight Dinner – 4 Tickets
An elegant dinner in Washington, DC with special appearances by President-elect Donald J. Trump, Mrs. Melania Trump, Vice President-elect Mike Pence, and Mrs. Karen Pence
- Inaugural Concert and Fireworks – 4 Tickets
An exciting musical celebration on the National Mall
- Parade – 4 VIP Tickets
A celebration of our nation stretching from the Capitol to the White House on historic Pennsylvania Avenue
- Inaugural Ball Premier Access – 4 Tickets
A black-tie affair with special appearances by President-elect Donald J. Trump, Mrs. Melania Trump, Vice President-elect Mike Pence, and Mrs. Karen Pence, premier access tickets allow entrance to the VIP ballroom.

Presidential Swearing-In Ceremony – 4 Tickets

This Congressional Ceremony is not part of our official package; however, Presidential Inaugural Committee (PIC) will have access to tickets.

Hospitality and Transportation

You and your designees will receive access to daytime and evening hospitality and our official shuttle system.

Recognition on All Printed Materials

You or your corporation will be recognized on select printed materials, if desired.

\$500,000 UNDERWRITER PACKAGE BENEFITS

Contributions to the 58th Presidential Inaugural Committee are not tax deductible as charitable contributions for federal income tax purposes. The 58th Presidential Inaugural Committee is organized as a 501(C)(4) organization. The Federal Election Campaign Act, as amended, requires the 58th Presidential Inaugural Committee to publicly report the name, address, and amount of contribution of all donors whose contributions to the Inaugural Committee aggregate \$200 or more. Contributions from foreign nationals, including foreign corporations are prohibited.

All funds solicited in connection with this event are by the Presidential Inaugural Committee and not by any federal candidates or officeholders.

Paid for by the 58th Presidential Inaugural Committee

Exhibit B



Redeem Tickets

Please enter the username and password that you received.

Username*

Password*

Login

[I don't have a login](#)

Resources

[Home](#)
[Ticketing](#)
[Press Inquiries](#)
[Terms & Conditions](#)
[Contact](#)
[Press Releases](#)
[Volunteer](#)

[FAQ](#)
[Calendar](#)
[Biography](#)
[Privacy Policy](#)
[Accessibility \(ADA\)](#)
[JECIC](#)

Stay Informed

Stay up to date with events

Email Address



Follow Us

Follow us on Social Media



CONTRIBUTIONS TO THE 58TH PRESIDENTIAL INAUGURAL COMMITTEE ARE NOT TAX DEDUCTIBLE AS CHARITABLE CONTRIBUTIONS FOR FEDERAL INCOME TAX PURPOSES. THE 58TH PRESIDENTIAL INAUGURAL COMMITTEE IS ORGANIZED AS A 501(C)(4) ORGANIZATION. THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED, REQUIRES THE 58TH PRESIDENTIAL INAUGURAL COMMITTEE TO PUBLICLY REPORT THE NAME, ADDRESS, AND AMOUNT OF CONTRIBUTION OF ALL DONORS WHOSE CONTRIBUTIONS TO THE INAUGURAL COMMITTEE AGGREGATE \$200 OR MORE. CONTRIBUTIONS FROM FOREIGN NATIONALS, INCLUDING FOREIGN CORPORATIONS ARE PROHIBITED.

ALL FUNDS SOLICITED IN CONNECTION WITH THIS EVENT ARE BY THE PRESIDENTIAL INAUGURAL COMMITTEE AND NOT BY ANY FEDERAL CANDIDATES OR OFFICEHOLDERS.

PAID FOR BY THE 58TH PRESIDENTIAL INAUGURAL COMMITTEE

Exhibit C



Shop



Commemorative License Plate

The Official 58th Presidential Inaugural License Plate

Product

\$50.00

Qty.

1

Plate Description

The perfect piece of inaugural memorabilia, our exclusive, limited edition commemorative license plate is a perfect collector's item, and a great way to celebrate President-elect Trump and his commitment to Make America Great Again!

Contribute Now

Contributions to the 58th Presidential Inaugural Committee are not tax deductible as charitable contributions for federal income tax purposes. The 58th Presidential Inaugural Committee is organized as a 501(C)(4) organization. The Federal Election Campaign Act, as amended, requires the 58th Presidential Inaugural Committee to publicly report the name, address, and amount of contribution of all donors whose contributions to the Inaugural Committee aggregate \$200 or more. Contributions from foreign nationals, including foreign corporations are prohibited.

All funds solicited in connection with this event are by the Presidential Inaugural Committee and not by any federal candidates or officeholders.

Paid for by the 58th Presidential Inaugural Committee

Exhibit D

**BEFORE THE
FEDERAL ELECTION COMMISSION**

WASHINGTON)

DISTRICT OF COLUMBIA)

MUR 7243

DECLARATION OF HEATHER MARTIN

I, Heather Martin, hereby declare as follows:

1. I am over 21 years of age, of sound mind, and I have personal knowledge of the facts stated below.

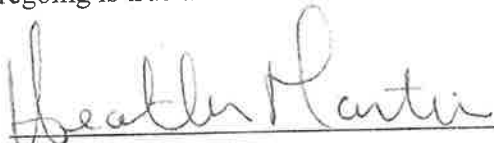
2. I was the Director of Budget & Treasury for the 58th Presidential Inaugural Committee ("PIC") from November 2016 through January 2017. My primary responsibilities as the Director of Budget & Treasury for the PIC were to manage PIC's day-to-day compliance activities, including the processing of incoming donations.

3. It was PIC's practice to screen corporate donations for legal compliance purposes. Specifically, it was PIC's practice to confirm that: the corporation was incorporated in the United States; the corporation maintained its principal place of business in the United States; the corporation provided a United States address with the donation; and the donation was drawn on a United States bank account.

4. On December 22, 2016, PIC received a wire transfer in the amount of \$500,000 from Citgo Petroleum Corporation ("Citgo").

5. PIC screened the donation from Citgo. Specifically, PIC reviewed the wire transfer information, which listed "Citgo Petroleum Corporation" at "1293 Eldridge Parkway, Suite 3040, Houston, Texas, 77077" as the transferor. PIC also confirmed that Citgo was incorporated in the United States and maintained its headquarters in Houston, Texas at the same address provided with the wire transfer. In addition, PIC confirmed with a representative of PIC's bank that Citgo's wire transfer originated from an account with the Bank of Texas, which is a United States financial institution.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.


Heather Martin


Date

Exhibit E

Date 12/30/16
Account
Enclosures

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Commercial Analysis

(Continued)

Activity in Date Order
Date Description

Amount

Balance

12/22 Wire Transfer Credit
CITGO PETROLEUM CORPORATION
1293 ELDRIDGE PKWY STE 3040
HOUSTON, TX 77077-

500,000.00

Exhibit F



Department of State: Division of Corporations

[Allowable Characters](#)[View Search Results](#)

Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

<u>File Number</u>	2005114	<u>Incorporation Date / Formation Date</u>	3/18/1983 (mm/dd/yyyy)
<u>Entity Name</u>	CITGO PETROLEUM CORPORATION		
<u>Entity Kind</u>	Corporation	<u>Entity Type</u>	General
<u>Residency</u>	Domestic	<u>State</u>	DELAWARE

REGISTERED AGENT INFORMATION

<u>Name</u>	THE CORPORATION TRUST COMPANY		
<u>Address</u>	CORPORATION TRUST CENTER 1209 ORANGE ST		
<u>City</u>	WILMINGTON	<u>County</u>	New Castle
<u>State</u>	DE	<u>Postal Code</u>	19801
<u>Phone</u>	302-658-7581		

Additional Information is available for a fee. You can retrieve Status for a fee of \$10.00 or more detailed Information including current franchise tax assessment, current filing history and more for a fee of \$20.00

Would you like ☐ Status ☐ Status, Tax & History Information

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Exhibit G



CITGO for You

CITGO for Your Business

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Contact Us

CITGO is fueling good, an American icon providing a good deal on good fuel, good lubricants and everything else.



Contact Us

Have a question or comment about CITGO products or programs? Here's how to reach us:

CITGO Customer Service

Light Oils Customer Service: Retail Locations, Gasoline, Diesel and Heating Oil - 1-800-423-8434

Northeast - CT, DE, MA, MD, ME, NH, NJ, NY, PA, RI, VA, VT, WV

Central - AR, IL, IN, LA, MI, TX, WI

Southern - AL, FL, GA, KY, MS, NC, SC, TN

Give us feedback by searching the [locator page](#) and clicking the individual store location website link. The feedback form is located on the bottom right.

Media Relations *(For news media calls only.)*

Corporate
Press Room
[1-800-34-CITGO](tel:1-800-34-CITGO)
press@citgo.com

CITGO Lake Charles
Dana Keel
1-337-708-8039
dankeel@citgo.com

CITGO Corpus Christi
Lisa Hinojosa
1-361-844-5243
lhinojo@citgo.com

CITGO Lemont
Pete Colarelli
1-630-257-4531
pcolare@citgo.com

CITGO Addresses

CITGO Petroleum Corporation

Mailing Address:
CITGO Petroleum Corporation
P.O. Box 4689
Houston, TX 77210-4689

Shipping Address:
1293 Eldridge Parkway
Houston, TX 77077-1670

Phone:
1-800-992-4846

Any other comments or questions?
Please write info@CITGO.com.

CITGO Credit Card Services

To contact us about CITGO credit cards, please call the appropriate number:

- CITGO Rewards[®] Card:
1-855-598-4879
- CITGO Fleet card:
1-866-926-5615

Club CITGO Customer Service Center

1-888-2-GO-CLUB (1-888-246-2582)

clubcitgo@citgo.com

Lubricants Product Information

Lubricants Customer Service: 1-800-331-4068, option 2

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CITGO lubrication engineers are available to answer your questions concerning specific lubricant applications. Please e-mail any questions to lubeshelp@citgo.com.

Safety Data Sheets

Click for access to all [Safety Data Sheets](#) (SDS). If you do not find a particular SDS sheet, please call the [CITGO Lubricants Product Answer Line](#) at 1-800-248-4684 or [Lubricants Customer Service](#) at 1-800-331-4068 (U.S.A.).

Note:

- If you have a MEDICAL EMERGENCY that involves a CITGO Product call 1-832-486-4700.
- If you have a transportation SPILL EMERGENCY, call CHEMTREC at 1-800-424-9300 (U.S.A.).