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June 5, 2018

General Counsel's Office  
Office of Complaints Examination and Legal  
Administration  
Federal Election Commission  
999 E. Street, NW  
Washington DC, 20463

To Whom it May Concern:

I am contacting you today regarding the above referenced Matter Under Review (MUR) 7333. Please accept this letter as my response and representation for Amy for the People and Josiah McKinney, Treasurer for Amy for the People. Enclosed please find Amy For The People's Statement of Designation of Counsel.

My name is Gregory Lance Coburn, Esq. I am an attorney practicing in Las Vegas, Nevada, NV Bar No.: 6604. My Firm name is Procopio, Cory, Hargreaves & Savtich, LLP, located at 390 Howard Hughes Pkwy, Suite 500 in Las Vegas, 89169. My telephone number is 702-216-2687, my fax number is 619-788-5500 and my email address is [lance.coburn@procopio.com](mailto:lance.coburn@procopio.com).

Our client received the Commissions notice and Complaint filed regarding Amy for the People's alleged violation of the Federal Election Campaign Act of 1971 on May 25, 2018. We request that no action should be taken against Amy for the People and Josiah McKinney in his official capacity as Treasurer for Amy for the People for the following reasons:

- Payment of \$2000.00 was recorded on amended filing - wasn't originally filed as complainants withheld bank statements and check copies. The filing was amended as soon as bank records were received.

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- Payment of \$3,263.88 was recorded on QTR1 2018 - wasn't recorded on QTR4 2017 as the complainants withheld bank statements and check copies. An amended filing can be prepared to remedy this issue if required.
- Accounts payable of \$19,538 was recorded as a payable in the amount we feel is what is owed. This matter is in litigation.

(See Declaration of Amy Vilela ("Vilela Decl.") enclosed herewith, ¶ 4-11).

The People's Project, LLC opened two bank accounts for Amy for the People outside of my congressional district, which I was never provided access to. Bank statements and check copies were intentionally withheld by the People's Project, LLC, thus contributing to the need for delayed or amended filings. (Vilela Decl., ¶ 8.) I requested numerous times to be added to the bank account and was denied each time. I did not have log-in information or access to checks or debit cards. The bank statements were mailed to a PO box that was set up for the campaign in Boulder City. I had no access to the PO Box. The People's Project, LLC did not act in good faith or in a professional manner that would be expected. The People's Project, LLC would not answer any written or verbal requests to communicate and put the campaign in a very precarious situation. (Vilela Decl., ¶ 9.)

After The People's Project, LLC refused to provide the requested information, I immediately began petitioning the bank for the bank statements but such process took time as I had to present information to the satisfaction of the bank and obtain permission from bank management before the statements would be released. Once I received the bank statements, I filed amended returns to the extent necessary. (Vilela Decl., ¶ 11.)

Pursuant to 52 U.S.C. § 30109(a)(4)(B) and § 30109(a)(12)(A) this matter is to remain strictly confidential and we respectfully request the Commission not to disclose any information regarding this or any Commission investigation to the public.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lance Coburn", written in a cursive style.

Lance Coburn

GLC

## DECLARATION OF AMY VILELA

I, Amy Vilela, declare as follows:

1. I am the District 4 Congressional Candidate for Amy for the People. I have personal knowledge of the facts set forth herein and, if called upon, I could and would competently testify thereto.
2. I submit this declaration in support of the response to Matter Under Review (MUR) No. 7333 submitted concurrently herewith.
3. I am familiar with the accounting practice employed by Amy for the People's campaign.
4. MUR No. 7333 references three items that were allegedly not listed on FEC Form 3 for the period ending December 31, 2017. Those three items are as follows:
  - a. Payment of \$2,000 on October 26, 2017 to People's Project, LLC for campaign consulting services;
  - b. Payment of \$3,263.88 on December 19, 2017 to People's Project, LLC for campaign consulting services; and
  - c. Accounts payable of \$19,538 to People's Project, LLC for campaign consulting services.
5. With respect to the payment of \$2,000 on October 26, 2017, said payment was recorded on an amended filing. Bank statements and check copies were intentionally withheld by the People's Project, LLC and the filing was amended as soon as the bank records were received.
6. With respect to the payment of \$3,263.88 on December 19, 2017 was recorded on Quarter 1 of 2018 rather than Quarter 4 of 2017 as bank statements and check copies were intentionally withheld by the People's Project, LLC. An amended filing can be prepared to remedy this issue if required.
7. With respect to the accounts payable of \$19,538 to People's Project, LLC, the amount recorded reflects the amount reasonably believed to be owed as a dispute exists regarding this payment which is currently the subject of litigation.
8. The People's Project, LLC opened two bank accounts for Amy for the People outside of my congressional district, which I was never provided access to. Bank statements and check copies were intentionally withheld by the People's Project, LLC, thus contributing to

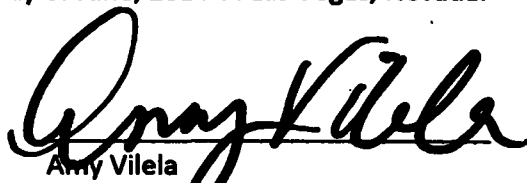
the need for delayed or amended filings.

9. I requested numerous times to be added to the bank account and was denied each time. I did not have log-in information or access to checks or debit cards. The bank statements were mailed to a PO Box that was set up for the campaign in Boulder City. I had no access to the PO Box. The People's Project, LLC did not act in good faith or in a professional manner that would be expected. The People's Project, LLC would not answer any written or verbal requests to communicate and put the campaign in a very precarious situation.

10. For over a month numerous attempts were made to contact People's Project, LLC by myself and their managing partner, Keenan Korth. Meetings were continually requested to discuss the path forward but no attempts were responded to and The People's Project, LLC refused to communicate on any level.

11. After The People's Project, LLC refused to provide the requested information, I immediately began petitioning the bank for the bank statements but such process took time as I had to present information to the satisfaction of the bank and obtain permission from bank management before the statements would be released. Once I received the bank statements, I filed amended returns to the extent necessary.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct. Executed this 5<sup>th</sup> day of June, 2018 at Las Vegas, Nevada.

  
Amy Vilela  
District 4 Congressional Candidate  
Amy for the People