

OFFICE OF
GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

2018 MAR 13 PM 4:37

COMMITTEE TO DEFEND
THE PRESIDENT
203 S. Union Street, Suite 300
Alexandria, VA 22314,

Complainant,

v.

CONOR LAMB
FEC ID Number H8PA18181
928 Washington Rd
Pittsburgh, PA 15228

CONOR LAMB FOR CONGRESS
FEC ID Number C00657411
P.O. Box 10381
Pittsburgh, PA 15234
Marco Attisano, Treasurer,

MARCO ATTISANO, in his official capacity
as Treasurer of Conor Lamb for Congress
P.O. Box 10381
Pittsburgh, PA 15234

END CITIZENS UNITED
FEC ID number C00573261
P.O. Box 66005
Washington, DC 20035
Deanna Nesburg, Treasurer,

DEANNA NESBURG, in her official capacity
as Treasurer of End Citizens United
P.O. Box 66005
Washington, DC 20035

ACTBLUE
P.O. Box 441146
Somerville, MA 02144-0031

Respondents.

MUR # 1347

VERIFIED COMPLAINT

Introduction

1. As one of the most hotly contested special elections of the decade draws to a close, Pennsylvania Democratic congressional candidate Conor Lamb has engaged in a desperate bid to bolster his flailing campaign through a last-minute fundraising appeal that blatantly violates federal campaign finance law.

2. Lamb's willingness to ignore federal law to fill his campaign coffers at all costs is all the more egregious since he touts his experience as a former Assistant United States Attorney as a qualification for public office. Lamb's dedication to law and order apparently ends when the law poses an obstacle to his campaign.

3. A fundraising e-mail sent on Friday March 9, 2017 purporting to be "From" Conor Lamb and is electronically signed by Conor Lamb, as well as the fundraising webpage to which it links, violates the Federal Election Campaign Act's limitations on contributions to candidates, solicitations of such contributions, and disclaimer requirements.

4. This Commission should take immediate action to deter federal candidates like Lamb from violating federal campaign finance law with impunity in the days before an election, when the temptation of illegally raising extra money may outweigh the perceived consequences.

PARTIES

5. Complainant COMMITTEE TO DEFEND THE PRESIDENT is a non-connected hybrid political committee registered with the Federal Election Commission ("FEC").

6. Respondent CONOR LAMB ("Lamb") is the 2018 Democratic candidate for the United States House of Representatives special election in Pennsylvania's 18th Congressional District. This Complaint is brought against Lamb in his capacity as a candidate.

7. Respondent CONOR LAMB FOR CONGRESS (“CLC”) is a federal principal campaign committee registered with the FEC and an authorized committee of Respondent CONOR LAMB. Its Treasurer is Respondent MARCO ATTISANO.

8. Respondent MARCO ATTISANO is Treasurer for Respondent CLC. This Complaint is brought against him in his official capacity as CLC’s Treasurer.

9. Respondent END CITIZENS UNITED (“ECU”) is a non-connected qualified multicandidate political committee registered with the FEC. Its Treasurer is Deanna Nesburg. ECU’s current Statement of Organization (Form 1) does not indicate it is registered as a hybrid political committee operating a *Carey* account.

10. Respondent DEANNA NESBURG is Treasurer for Respondent ECU. This Complaint is brought against her in her official capacity as ECU’s Treasurer.

11. Respondent ACTBLUE is a nonprofit organization.

RELEVANT CAMPAIGN FINANCE LAWS

12. Contribution Limits—52 U.S.C. § 30116(a)(1)(B), as adjusted for inflation,¹ permits a person to contribute no more than \$2,700 per election to a candidate committee and \$5,000 per year to a multicandidate or non-multicandidate political committee during the 2017-2018 election cycle. *Accord* 11 C.F.R. § 110.1(b)(1). Section 30116(f) further provides, “No candidate or political committee shall knowingly accept any contribution . . . in violation” of federal limits. *Accord* 11 C.F.R. § 110.9.

13. Fundraising by Federal Candidates—52 U.S.C. § 30125(e)(1)(A) provides a candidate shall not “solicit” or “receive . . . funds in connection with an election for Federal office

¹ See FEC, *Price Index Adjustments for Contribution and Expenditure Limitations and Lobbyist Bundling Disclosure Threshold*, 80 Fed. Reg. 5,750, 5,752 (Feb. 3, 2015).

. . . unless the funds are subject to the limitations, prohibitions, and reporting requirements of [the Federal Election Campaign] Act.”

14. Prohibition on Fraudulent Solicitation of Funds—52 U.S.C. § 30124(b) provides, “No person shall fraudulently misrepresent the person as speaking, writing, or otherwise acting on behalf of any candidate . . . for the purpose of soliciting contributions or donations.” *Accord* 11 C.F.R. § 110.16(b).

15. Disclaimer Requirements—52 U.S.C. § 30120(a) provides any “general public political advertising” by a political committee or any solicitation by any person distributed through “general public political advertising” must contain a disclaimer. Commission regulations specify these requirements apply to “electronic email of more than 500 substantially similar communications when sent by a political committee; and all Internet websites of political committees available to the general public.” 11 C.F.R. § 110.11(a)(1).

a. If the communication “is paid for and authorized by a candidate, an authorized committee of a candidate, or its agents,” it must “clearly state the communication has been paid for by such authorized committee.” 52 U.S.C. § 30120(a)(1); *accord* 11 C.F.R. § 110.11(b)(1).

b. If the communication is authorized by a candidate, an authorized committee of a candidate, or its agents, but is “paid for by other persons,” it must “clearly state the communication is paid for by such other persons and authorized by such authorized political committee.” 52 U.S.C. § 30120(a)(2); *accord* 11 C.F.R. § 110.11(b)(2).

c. If the communication “is not authorized by a candidate, an authorized committee of a candidate, or its agents,” it must “state that the communication is not authorized by any candidate or candidate’s committee,” as well as the “name and permanent street address,

telephone number, or World Wide Web address of the person who paid for the communication.”
52 U.S.C. § 30120(a)(3); *accord* 11 C.F.R. § 110.11(b)(3).

CONOR LAMB’S ILLEGAL E-MAIL SOLICITATION

16. An email (hereafter, “E-mail Solicitation”) was distributed on Friday, March 9, 2018, purporting to be from Conor Lamb. The email’s header states it is “From: Conor Lamb” and the e-mail is signed “-Conor.” A true and complete copy of the E-mail Solicitation is attached to this Complaint as Exhibit A.

17. In addition to this identifying information, the context and use of first person language in the E-mail Solicitation would lead a reasonable reader to believe Lamb in fact sent the message. In particular, the E-mail Solicitation refers to “My Special Election” and notes, “End Citizens United members have been with me from the start of this campaign.” Exh. A.

18. The E-mail Solicitation does not specify the number or identities of its recipients. On information and belief, the E-mail Solicitation was sent to more than 500 distinct e-mail addresses and recipients.

19. The E-mail Solicitation contains an express solicitation for contributions. It states, “I still need 9,103 donations before tomorrow’s budget deadline.” It exhorts readers, “[P]lease rush an online donation now,” and contains a series of buttons containing hypertext links allowing readers to “Chip in” various dollar amounts ranging from \$5 to \$100, or an unspecified “Other Amount.” Exh. A.

20. The E-mail Solicitation ends by soliciting readers to “[u]se this link to donate every dollar you can,” and provides a unique link: <http://act.endcitizensunited.org/Elect-Lamb>. Neither the solicitation to “donate every dollar you can” nor the button specifying “Other Amount” makes

any mention of applicable contribution limits, but rather suggest a willingness to accept unlimited amounts of money. Exh. A.

21. The E-mail Solicitation's disclaimer states, "PAID FOR BY END CITIZENS UNITED PAC (ENDCITIZENSUNITED.ORG) AND NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE." Exh. A.

22. The E-mail Solicitation does not explain how it can be "From" Conor Lamb, signed by Lamb, and apparently written by Lamb in the first person, and yet "NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE." Exh. A.

23. A true and complete copy of ECU's Statement of Organization is attached to this Complaint as Exhibit C.

THE ILLEGAL SOLICITATION PAGE

24. The E-mail Solicitation contains a link that directs the reader to <http://act.endcitizensunited.org/Elect-Lamb> (hereafter, "the Webpage"). A true and complete copy of the Webpage is appended to this Complaint as Exhibit B.

25. The Webpage contains a header stating, "END CITIZENS UNITED / DEMOCRATS FIGHTING FOR REFORM" and specifies "SECURED BY ACTBLUE." Exh. B.

26. The Webpage states, "Rush \$5 or whatever you can afford directly to Conor Lamb's campaign." It further notes, "Your contribution will be evenly divided between Conor Lamb and End Citizens United," but gives contributors the option to "allocate amounts differently." Exh. B.

27. The Webpage contains a blank space in which contributors may manually enter the amount they wish to contribute. The Webpage will accept contributions of up to \$7,700. If a contributor enters an amount exceeding \$5,000, then clicks on the link to "allocate amounts

differently,” the contributor is permitted to allocate his or her entire contribution—including amounts in excess of \$2,700—to Conor Lamb.

28. If a person makes the maximum contribution permitted by the website of \$7,700 and does not manually reallocate the contribution between Lamb and ECU, it is evenly divided between the two, resulting in an illegal excessive contribution of \$3,850 to Lamb.

29. The Website contains a disclaimer stating, “Paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate’s committee.” Exh. B.

30. The Website further explains:

Contributions to End Citizens United are subject to the limits and prohibitions of federal law. Contributions that exceed \$5,000 in the aggregate in a calendar year will be deposited in End Citizens United's non-federal account. Some contributions set to recur monthly are held and segregated by End Citizens United PAC and may be used toward future donor matching programs to incentivize grassroots giving.

Exh. B.

31. The Website also fails to specify what, if anything, will be done with contributions to Lamb that exceed \$2,700 in the aggregate for the general election.

CAUSES OF ACTION

COUNT I AGAINST RESPONDENTS CONOR LAMB, CONOR LAMB FOR CONGRESS, AND MARCO ATTISANO **Solicitation of Excessive Contributions by Federal Candidate in Violation of 52 U.S.C. § 30125(e)(1)(A) and 11 C.F.R. § 300.61**

32. Complainant hereby re-alleges and incorporates by reference the preceding paragraphs as if fully set forth herein.

33. The E-mail Solicitation declared it was “From” Conor Lamb, was written in the first person as if by Lamb, and was electronically signed by Lamb. It exhorted contributors to “[u]se this link to donate every dollar you can” and provided a link to a webpage,

<http://act.endcitizensunited.org/Elect-Lamb>, that permits individuals to contribute up to \$7,700 to Lamb.

34. 52 U.S.C. § 30125(e)(1)(A) and 11 C.F.R. § 300.61 make it illegal for a federal candidate to solicit funds in excess of federal limits. Pursuant to 52 U.S.C. § 30116(a)(1)(B) and 11 C.F.R. § 110.1(b)(1), the limit on contributions from individuals to Lamb in connection with the special election is \$2,700.

35. Lamb and his campaign committee solicited contributions in excess of \$2,700.

WHEREFORE, Respondents violated 52 U.S.C. § 30125(e)(1)(A) and 11 C.F.R. § 300.61.

COUNT II
AGAINST RESPONDENTS CONOR LAMB, CONOR LAMB FOR
CONGRESS, AND MARCO ATTISANO
Acceptance of Excessive Contributions by Federal Candidate
in Violation of 52 U.S.C. § 30116(a)(1)(A), (f) and 11 CFR §§ 110.1(b)(1), 110.9

36. Complainant hereby re-alleges and incorporates by reference the preceding paragraphs as if fully set forth herein.

37. The website to which Lamb's e-mail directs readers, by default, accepts contributions to Lamb of up to \$3,850 and, depending on how users allocate their contributions, will accept contributions to Lamb of up to \$7,700.

38. Pursuant to 52 U.S.C. § 30116(a)(1)(A) and 11 C.F.R. § 110.1(b)(1), the limit on contributions from individuals to Lamb in connection with the special election is \$2,700.

39. 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9 make it illegal for federal candidates or political committees to "knowingly accept" contributions in excess of applicable limits.

40. On information and belief, through the Website, Lamb and his campaign committee accepted contributions in excess of \$2,700.

WHEREFORE, Respondents violated 52 U.S.C. § 30116(a)(1)(A), (f) and 11 C.F.R. § 110.1(b)(1), 110.9.

COUNT III
AGAINST RESPONDENT ECU
Fraudulent Solicitation of Funds
in Violation of 52 U.S.C. § 30124(b) and 11 CFR § 110.16(b)

41. Complainant hereby re-alleges and incorporates by reference the preceding paragraphs as if fully set forth herein.

42. The E-mail Solicitation declared it was “From” Conor Lamb, was written in the first person as if by Lamb, and was electronically signed by Lamb. The E-mail Solicitation also solicited readers to contribute to Lamb.

43. The disclaimer to the e-mail, however, stated it was PAID FOR BY END CITIZENS UNITED PAC (ENDCITIZENSUNITED.ORG) AND NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE’S COMMITTEE.”

44. Federal law provides, “No person shall fraudulently misrepresent the person as speaking, writing, or otherwise acting on behalf of any candidate . . . for the purpose of soliciting contributions or donations.” 52 U.S.C. § 30124(b); 11 C.F.R. § 110.16(b).

45. If Lamb neither sent nor authorized ECU’s e-mail, ECU fraudulently represented itself as acting on Lamb’s behalf for the purpose of soliciting contributions.

WHEREFORE, Respondent ECU violated 52 U.S.C. § 30124(b) and 11 CFR §110.16(b).

COUNT IV
AGAINST RESPONDENT ECU
Improper Disclaimer
in Violation of 52 U.S.C. § 30120(a)(3) and 11 C.F.R. § 110.11(b)(3)

46. Complainant hereby re-alleges and incorporates by reference the preceding paragraphs as if fully set forth herein.

47. Federal law provides if a political committee makes a disbursement for general public political advertising, or any person solicits a contribution through general public political advertising, it must contain a disclaimer. The exact nature of the disclaimer depends on whether the communication is authorized and/or paid for by a candidate:

48. These requirements apply to “electronic email of more than 500 substantially similar communications when sent by a political committee.” 11 C.F.R. § 110.11(a)(1).

a. If the communication “is paid for and authorized by a candidate, an authorized committee of a candidate, or its agents,” it must “clearly state the communication has been paid for by such authorized committee.” 52 U.S.C. § 30120(a)(1); *accord* 11 C.F.R. § 110.11(b)(1).

b. If the communication is authorized by a candidate, an authorized committee of a candidate, or its agents, but is “paid for by other persons,” it must “clearly state that the communication is paid for by such other persons and authorized by such authorized political committee.” 52 U.S.C. § 30120(a)(2); *accord* 11 C.F.R. § 110.11(b)(2).

49. The E-mail Solicitation declared it was “From” Conor Lamb, was written in the first person as if by Lamb, and electronically signed by Lamb. It exhorts contributors to “[u]se this link to donate every dollar you can” and links to a webpage, <http://act.endcitizensunited.org/Elect-Lamb>, that permits individuals to contribute up to \$7,700 to Lamb.

50. The disclaimer for the E-mail Solicitation nevertheless states, "PAID FOR BY END CITIZENS UNITED PAC (ENDCITIZENSUNITED.ORG) AND NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE."

51. Since the E-mail Solicitation suggests, at a minimum, it was authorized by Conor Lamb, the disclaimer is both fraudulent and illegal.

WHEREFORE, Respondent ECU has violated 52 U.S.C. § 30120(a) and 11 C.F.R. § 110.11(b).

CONCLUSION

For these reasons, Complainant CDP respectfully requests the Federal Election Commission commence enforcement proceedings against Respondents.

Respectfully submitted,

Petra A. Mangini
Petra A. Mangini, Esq.
POLITICAL.LAW
203 South Union Street, Suite 300
Alexandria, VA 22314
(202) 210-5431
petra@political.law
*Counsel for Complainant Committee
to Defend the President*

VERIFICATION

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

Alexandria, VA 3/12/18
my comm exp 4/30/2020
347285

Petra A. Mangini
Petra A. Mangini, Esq.
*Counsel for Complainant Committee
to Defend the President*



Exhibit A

[REDACTED]

[REDACTED]

[REDACTED]

From: Conor Lamb [mailto:admin@endcitizensunited.org]

Sent: Friday, March 9, 2018 10:06 AM

To: [REDACTED]

Subject: apologies

Sorry, but I need to reach out again. **It's important:**

- My Special Election is virtually tied.
- But Republicans are outspending us 17-to-1.
- **And I still need 9,103 donations before tomorrow's budget deadline.**

If we fall short, we'll lose.

This is it! So please rush an online donation now:

Chip in \$5 immediately →
Chip in \$15 immediately →
Chip in \$35 immediately →
Chip in \$50 immediately →
Chip in \$100 immediately →
Other Amount →

End Citizens United members have been with me from the start of this campaign. Will you help us finish strong?

Use your link to donate every dollar you can:

<http://act.endcitizensunited.org/Elect-Lamb>

-Conor

This message was sent to: [REDACTED]
[Click here to receive fewer emails.](#) | [Click here to unsubscribe.](#)

END CITIZEN

WE'RE FIGHTING

GOP SUPERPACS

SO WE CAN

ELECT REFORMERS

End Citizens United PAC
P.O. Box 66005
Washington D.C. 20035

PAID FOR BY END CITIZENS UNITED PAC (ENDCITIZENSUNITED.ORG) AND NOT
AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE

This message was sent to: [REDACTED] Change or update your email address by [clicking here.](#)

Thank you for supporting the End Citizens United PAC. We're proud to be funded exclusively by grassroots donors. Your support is critical to helping us counter the disastrous effects of *Citizens United* and reform our campaign finance system.

Emails are a crucial way to stay in touch with our top supporters. If we're going to pass a Constitutional Amendment to overturn this decision, we need you with us every step of the way.

If you'd still like to unsubscribe from our emails, [click here](#). If you'd like to receive fewer emails, you can [click here](#). If you'd like to donate to help fund our efforts to fix America's broken campaign finance system, please [click here](#).

From the entire *End Citizens United* team, thanks for your support!

Exhibit B

END CITIZENS UNITED

DEMOCRATS FIGHTING FOR REFORM

SECURED BY ActBlue

4X MATCH ACTIVE!

Mike Pence and Donald Trump are trying to ruin
Conor's Democratic campaign.

Rush \$5 or whatever you can afford directly to
Conor Lamb's campaign:

1 Your contribution

NOTE: Your contribution will be divided evenly between Conor Lamb and End
Citizens United. [Click here to activate automatic payments.](#)

\$15

\$35

\$50

\$100

\$250

\$500

\$1,000

\$

Continue

Contribution rules

1. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.
2. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
3. I am not a federal contractor.
4. I am at least eighteen years old.
5. I am a (U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).

Contributions or gifts to End Citizens United are not tax deductible. Federal law prohibits contributions from corporations, labor organizations and national banks; from any person contributing another person's funds; from foreign nationals who lack permanent residence status; and from federal government employees. All contributions must be made from personal funds and may not be reimbursed by any other person. Contributions to End Citizens United are subject to the limits and provisions of Federal law. Contributions that exceed \$2,000 in the aggregate in a calendar year will be deposited in End Citizens United's non-federal account. Some contributions will be held and aggregated by End Citizens United until they are used toward future donor matching programs to incentivize grassroots giving.

Paid for by ActBlue (actblue.com) and not authorized
by any candidate or candidate's committee.

Contributions or gifts to ActBlue are not deductible as
charitable contributions for Federal income tax
purposes.

FEC FORM 1

STATEMENT OF ORGANIZATION

Office Use Only

1. NAME OF COMMITTEE (in full) (Check if name is changed) Example: If typing, type over the lines. 12FE4M5
End Citizens United

ADDRESS (number and street) P.O. Box 66005
(Check if address is changed)
Washington DC 20035
CITY STATE ZIP CODE

COMMITTEE'S E-MAIL ADDRESS
X (Check if address is changed) compliance@endcitizensunited.org
Optional Second E-Mail Address

COMMITTEE'S WEB PAGE ADDRESS (URL)
(Check if address is changed) endcitizensunited.org

2. DATE 02 / 07 / 2018

3. FEC IDENTIFICATION NUMBER C C00573261

4. IS THIS STATEMENT NEW (N) OR X AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Nesburg, Deanna, . .

Signature of Treasurer Nesburg, Deanna, . . [Electronically Filed] Date 02 / 07 / 2018

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

5. TYPE OF COMMITTEE

Candidate Committee:

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate _____

Candidate Party Affiliation Office Sought: House Senate President State District

- (c) This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate _____

Party Committee:

- (d) This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

- (e) This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

- Corporation Corporation w/o Capital Stock Labor Organization
- Membership Organization Trade Association Cooperative

In addition, this committee is a Lobbyist/Registrant PAC.

- (f) This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

In addition, this committee is a Lobbyist/Registrant PAC.

In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

- (g) This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1. _____ FEC ID number C _____
2. _____ FEC ID number C _____
3. _____ FEC ID number C _____
4. _____ FEC ID number C _____

Write or Type Committee Name

End Citizens United

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

NONE

Mailing Address

CITY

STATE

ZIP CODE

Relationship: Connected Organization Affiliated Committee Joint Fundraising Representative Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name Nesburg, Deanna, , ,

Mailing Address P.O. Box 66005

Washington DC 20035

Title or Position CITY STATE ZIP CODE

Treasurer Telephone number 202 798 5253

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer Nesburg, Deanna, , ,

Mailing Address P.O. Box 66005

Washington DC 20035

Title or Position CITY STATE ZIP CODE

Treasurer Telephone number 202 798 5253

Full Name of Designated Agent Muller, Tiffany, , ,

Mailing Address P.O. Box 66005

Washington DC 20035 -

CITY STATE ZIP CODE

Title or Position President Telephone number 202 - 798 - 5253

9. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Bank of America

Mailing Address 1801 K Street, NW

Washinton DC 20006 -

CITY STATE ZIP CODE

Name of Bank, Depository, etc.

Amalgamated Bank

Mailing Address 1825 K Street, NW

Washington DC 20006 -

CITY STATE ZIP CODE