KAUFMAN LEGAL GROUP A PROFESSIONAL CORPORATION

OFFICE OF GENERAL COUNSEL

2018 1104 -1 AM 11: 4:

September 27, 2018

Direct: (213) 452-6550

VIA U.S. MAIL AND E-MAIL

Jeff S. Jordan
Assistant General Counsel
Office of Complaints Examination and Legal Administration
Federal Election Commission
1050 First Street, NE
Washington, DC 20436
Email: CELA@fec.gov

FEC MUR 7448

Dear Mr. Jordan:

We are writing as counsel to the California Democratic Party and its Treasurer, Katherine Moret, in response to the complaint filed by the National Legal and Policy Center on or about August 1, 2018 ("the "Complaint"), in MUR 7448.

Introduction

The Complaint was filed against the California Democratic Party ("CDP") and its Treasurer, Katherine Moret; Citizens for Waters and its Treasurer, David L. Gould; and Kamala Harris for Senate and its Treasurer, Stephen J. Kaufman, alleging violations of the contribution limits set forth in Sections 431(8)(A)(i), 432(e)(3) and 441a(a)(2)(A) of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 CFR 100.52. The Complaint alleges that a \$35,000 payment made by the CDP to Citizens for Waters for a slate mailer featuring Kamala Harris was an illegal "coordinated" contribution exceeding the Party's \$5,000 contribution limit.

However, the Complaint completely overlooks and fails to acknowledge the existence of the CDP's separate "coordinated party expenditure" limit, which allowed the CDP to make the payment to Citizens for Waters on behalf of Kamala Harris for Senate in connection with the November 8, 2016 General Election. (See 52 U.S.C. 30116(d) and 11 C.F.R. 109.30, 109.32-109.34.) The payment was within the CDP's coordinated expenditure limit for the 2016 General Election, and was timely and properly disclosed by the CDP and Citizens for Waters on their campaign reports. Therefore, the Complaint does not provide any basis for asserting a violation of the Act or Commission regulations, and the Commission should immediately dismiss the complaint as to all respondents.

The Complaint refers to the prior statutory provisions. These sections have been renumbered as 52 U.S.C. §§ 30101(8)(A)(i), 30102(e)(3) and 30116(a)(2)(A).

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Analysis

The CDP (FEC ID#C00105668) is the federally registered state party committee of the Democratic Party in California. A state party committee may contribute up to \$5,000 per election to a U.S. Senate candidate. Separate and in addition to this contribution limit, a state party committee may make "coordinated party expenditures" in connection with the general election of a federal candidate. (52 U.S.C. 30116(d); 11 C.F.R. 109.30, 109.32-109.34.) A state party committee may pay for goods or services (including communications) on behalf of a federal candidate, up to the applicable "coordinated party expenditure" limit.

The Commission has provided guidance explaining the difference between the party's use of its contribution limit and its coordinated party spending authority, as follows: "In making a coordinated party expenditure, the party committee pays for goods or services in coordination with a candidate but does not give the money directly to the candidate or candidate committee. For example, the payment of a campaign bill could be treated and reported as a coordinated party expenditure . . ." Accordingly, the Act, FEC regulations and Commission guidance are all clear that a state party can use its coordinated spending authority outside of its \$5,000 per election contribution limit, to pay a bill on behalf of a general election candidate for U.S. Senate in the state.

The coordinated party expenditure limit for a Senate candidate is calculated as follows: state voting age population x 2 cents, increased by the COLA; or \$20,000 increased by the COLA, whichever is greater. (52 U.S.C. 30116(d); 11 C.F.R. 109.32.) Based on the statutory formula, the CDP's "coordinated party expenditure" limit during the 2016 election cycle applicable to a candidate for United States Senate was \$2,886,500. (https://transition.fec.gov/info/charts_cpe_2016.shtml.)

In 2016, Kamala Harris was the endorsed candidate of the CDP and the Democratic nominee for the office of United States Senator in the November 8, 2016 General Election.³ For the 2016 election cycle, the CDP spent a total of \$1,343,244.18 in "coordinated party expenditures" on behalf of Kamala Harris in connection with the general election in accordance with 52 U.S.C. § 30116(d). Kamala Harris prevailed in the general election and is now a current United States Senator from California. Kamala Harris for Senate (FEC ID# C00571919) is Senator Harris' principal campaign committee.

Citizens for Waters (FEC ID#C00167585) is the principal campaign committee of Congresswoman Maxine Waters. In accordance with California law, Citizens for Waters produces and distributes a "slate mailer" known as the Congresswoman Maxine Waters Sample Ballot and Voter Recommendations, featuring federal and non-federal candidates appearing on the ballot. Pursuant to the FEC in Advisory Opinion 2004-37 (Waters), a payment made by a federal candidate to Citizens for Waters for the proportionate costs of his or her appearance in the slate mailer is not considered a contribution to Citizens for Waters.

² Federal Election Commission, Campaign Guide for Political Party Committees at 48 (Aug. 2013), available at https://www.fec.gov/resources/cms-content/documents/partygui.pdf (emphasis added).

³ Because of California's "Top Two" primary system, Senator Harris was actually one of two Democrats competing in the November 8, 2016 General Election.

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For the November 6, 2018 general election, Citizens for Waters requested payment from Kamala Harris for Senate in the amount of \$35,000, for the proportionate cost of the Waters' slate mailer attributable to Kamala Harris. The CDP issued a \$35,000 payment to Citizens for Waters on October 13, 2016 for Sen. Harris' appearance in the general election slate mailer. The CDP disclosed that payment as a "Coordinated Party Expenditure" on Schedule F for Line 25 of the Committee's 12 Day Pre-General Report for the period 10/1/16-10/19/16. The report indicated that the payment was made on behalf of Kamala Harris, and described the payment as "Fair share of slate mailer." (A true and correct copy of the cover page and relevant page from the CDP's 12 Day Pre-General Report is attached as Exhibit "A".)⁴

As is evident from the Complaint, Citizens for Waters disclosed the \$35,000 payment received from the CDP as a slate mailer payment on Schedule A for Line 15 on its 12 Day Pre-General Report, and on its Slate Mailer Organization Campaign Statement (Form 401) filed under California law. (See relevant pages of Citizens for Waters reports, submitted with the Complaint and reattached here for convenience collectively as Exhibit "B".)⁵

The Complaint alleges that the payment made by the CDP to Citizens for Waters for the appearance of Kamala Harris on the slate mailer was an excess contribution that did not qualify as an "exempt party activity." (see 11 CFR §§100.80, 100.140.) Respondents do not dispute that this payment is not an "exempt party activity." However, as is evident from this response and the supporting materials – including the Complaint itself – the \$35,000 payment made by the CDP to Citizens for Waters was a proper "coordinated party expenditure" under 52 U.S.C. § 30116(d), and was properly and timely reported as such by the CDP. Therefore, the Complaint is baseless.

Conclusion

For the reasons described herein, the Complaint does not contain any factual or legal basis for asserting a possible violation of the Act by respondents. The CDP made a proper payment for the general election on behalf of Kamala Harris within its "coordinated party expenditure" limit, and the payment was properly disclosed by the CDP and Citizens for Waters on their 12 Day Pre-General Reports. In filing this Complaint, the National Legal and Policy Center has either completely misconstrued the law or purposefully chosen to ignore the key statute and regulations providing the basis for this payment.

⁴ The CDP originally described the expenditure as a "slate mailer" payment and then amended its 12 Day Pre-General Report to add the "Fair Share" language.

⁵ Citizens for Waters reported the payment on its 12 Day Pre-General Report as received from the Democratic State Central Committee of California FFA, the name on the bank account used by the CDP for its federal program.

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Therefore, we respectfully request that the Commission find no reason to believe a violation has occurred, and dismiss this Complaint in its entirety with no further action against respondents.

Very truly yours,

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Enclosures

EXHIBIT "A"

Only

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS

FORM 3X	For Other	Than An Auth	orized Comm	ittee		Office Use Only,	
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SCHEDULE F (FEC Form 3X)

ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

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PAGE 349 OF

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PAGE 1 / 396

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

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Signature of Treasurer Morel,	Katherine, , ,	[Electronically Filed]	Date 10 27 2016			
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SCHEDULE F (FEC Form 3X)

ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

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EXHIBIT "B"

FEC FORM 3

REPORT OF RECEIPTS AND DISBURSEMENTS

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SCHEDULE A (FEC Form 3) **ITEMIZED RECEIPTS**

TOTAL This Period (last page this line number only)........

FOR LINE NUMBER: PAGE OF 24 Use separate schedule(s) (check only one) for each category of the 11a 11b 11c 11d **Detailed Summary Page** 12 13a

X 15 Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. NAME OF COMMITTEE (In Full) CITIZENS FOR WATERS Full Name (Last, First, Middle Initial) Californians for Lower Drug Prices **Date of Receipt** Mailing Address 6255 W Sunset Blvd 21st Floor *M = M 4 / \$ 0 = 0 + / \$ 0 = 4 10__1 15_1 2016 City State Zip Code Transaction ID: 15-6741-0 CA 90028 Los Angeles FEC ID number of contributing Amount of Each Receipt this Period C federal political committee. 20000.00 Name of Employer Occupation Memo Item Receipt For: Election Cycle-to-Date Slate Mailer Payment **Primary** General 20000.00 Other (specify) ▼ Full Name (Last, First, Middle Initial) **Democratic State Central Committee of California FFA** Date of Receipt Mailing Address 1830 9th St City State Zip Code Transaction ID: 15-6742-O Sacramento CA 95811 FEC ID number of contributing C Amount of Each Receipt this Period federal political committee. 35000.00 Name of Employer Occupation Memo Item Receipt For: Election Cycle-to-Date Slate Mailer Payment **Primary** General 35000.00 Other (specify) w Full Name (Last, First, Middle Initial) For Adult Industry Responsibility Committee **Date of Receipt** Mailing Address 6255 W Sunset Blvd 21st Floor 15 2016 City State Zip Code Transaction ID: 15-6740-0 CA Los Angeles 90028 FEC ID number of contributing C Amount of Each Receipt this Perlod federal political committee. 20000,00 Name of Employer Occupation Receipt For: Memo Item Election Cycle-to-Date Slate Mailer Payment **Primary** General Other (specify) 20000.00 75000.00 SUBTOTAL of Receipts This Page (optional).....

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FULL NAME OF SLATE MALER ORGANIZATION: CITIZENS FOR WATERS		ID NUMBER If this I 1274 R33	If this State Maller Organization is also a "general purpose committee" as defined in Communicate Code Serdon 82077 5, charle box and affects the committee's committee	urpose committee" as defined in
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David Gould				
Address	NO AND STREET			
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II Summary of Payments			(8)	
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V Verification				
I have used all reasonable diligence in preparing this st herein and in the attached schedules is true and comple	ence in preparing this st dules is true and compl	I have used all reasonable diligence in preparing this statement. I have reviewed the statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is	t and to the best of my knowledge the nder the laws of the State of Californi	information contained that the foregoing is
true and correct. Executed on 10/25/2016	₹	8	David L. Gould	
DATE		CITY AND STATE	SIGNATURE OF RESPONSIBLE OFFICER	HBLE OFFICER
Name of Responsible Officer	David L. Gould	Tide:	Treasurer	
	TYPE OR PRINT			
FOR INFORMATION REQUIRED TO BE PROVIDED TO YOU PURSUANT TO THE INFORMATION PRACTICES ACT OF 1977, SEE	U PURSUANT TO THE INFORMATION PRA		INFORMATION MANUAL ON CAMPAIGN DISCLOSURE PROVISIONS OF THE POLITICAL REFORM ACT FOR SLATE MALLER ORGANIZATIONS,	RM ACT FOR SLATE MALER ORGANIZATIONS.

Schedule A	Vie A					SCHEDULEA
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CITIZENS	CITIZENS FOR WATERS				1271833	
(1)	(2)	(3)			(4)	(5)
DATE	IDENTIFICATION OF PERSONS FROM WHOM \$100 OR MORE HAS BEEN RECEIVED THIS PERIOD (SEE IMPORTANT INSTRUCTIONS ON REVERSE)	(B) NAME, OFFICE SOUGHT, AND JUNSDICTION OF CANDIDATE/ NAME, JUNSDICTION, AND NUMBER OR LETTER OF BALLOT MEASURE SUPPORTED OR OPPOSED (IF DIFFERENT THAN COLUMN 2)	CHECK BOX TO INDICATE IF PAYMENT WAS RECEIVED TO SUPPORT OR OPPOSE CANDIDATE OR MEASURE INCLUDED IN SLATE MALLES SUBDORT	CHECK BOX TO INDICATE IF PAYMENT WAS RECEIVED TO SUPPORT OR OPPOSE CANDIDATE OR MEASURE INCLUDED IN SLATE MALLER SLIDDODT OPDOSE	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE AMOUNT RECEIVED SINCE JANUARY 1 PER CANDIDATE
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10/15/2016	Californians for Lower Drug Prices		×		20000.00	20000.00
_		Statewide				
	Los Angeles CA 90028 Reference No:	61	_		·	
10/15/2016 	For Adult Industry Responsibility Committee		×		20000.00	20000.00
	Los Angeles CA 90028 Reference No:					•
Summary	-			SUBTOTAL \$		
1. Amount (Include	Amount Received - Payments of \$100 or More (Include all Schedule A subtotals)	9	1550	155000.00		
2. Amount Recei (Not itemized)	2. Amount Received - Payments of Less than \$100 (Not itemized)	9		0.00		
3. Total Pa Column	Total Payments Received (Line 1 + Line 2) Enter here and in Column A, Line 1, of the Summary of Payments section on Page 1	rhere and in section on Page 1	1550	155000.00		

Schedule A Payments F	Schedule A Payments Received		Stateme from	Statement covers period rom09/25/2016	S SACHFORNYA (EER FORM	SCHEDULE A
SEEINSTR	SEE INSTRUCTIONS ON RÉVERSE		through	10/22/2016		60
NAME OF	NAME OF SLATE MAILER ORGANIZATION: CITIZENS FOR WATERS				1.D NUMBER	
(E)	(2)	(3)			(4)	(5)
DATE RECEIVED	IDENTIFICATION OF PERSONS FROM WHOM \$100 OR MORE HAS BEEN RECEIVED THIS PERIOD (SEE IMPORTANT INSTRUCTIONS ON REVERSE)	(8) NAME, OFFICE SOUGHT, AND JURISDICTION OF CANDIDATE NAME, JURISDICTION, AND NUMBER OR LETTER OF BALLOT MEASURE SUPPORTED OR OPPOSED (IF DIFFERENT THAN COLUMN 2)	CHECK BOX T PAYMENT WAS SUPPORT CANDIDATE C INCLUDED IN	CHECK BOX TO INDICATE IF PAYMENT WAS RECEIVED TO SUPPORT OR OPPOSE CANDIDATE OR MEASURE INCLUDED IN SLATE MALLER	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE AMOUNT RECEIVED SINCE JANUARY 1 PER CANDIDATE
			SUPPORT	OPPOSE		
10/17/2016 [Democatic State Central Committee of California FFA	. Kamala Harris	×		35000.00	35000.00
	Sacramento CA 95811 Reference No:	Orier - U.S. Senate				
10/17/2016	10/17/2016 Susan Jung Townsend for Judge 2016	Susan Jung Townsend	×		10000.00	20000.00
_		Superior Court Judge		3 3000		
	Long beach CA 90802 Reference No:	Los Angeles County				
10/19/2016	10/19/2016 Hall for Congress 2016	Isadore Hall	×		7500.00	27500.00
-	Long Beach CA 90802 Reference No:	Other – U.S. House of Representatives	·			
Summary	Σ.			SUBTOTAL	•	
1. Amount (include	Received - Payments of \$100 or More	1. Amount Received - Payments of \$100 or More (include all Schedule A subtotals)				
2. Amount (Not iten	2. Amount Received - Payments of Less than \$100 (Not itemized)	ý				
3. Total Pa Column	Total Payments Received (Line 1 + Line 2) Enter here and in Column A, Line 1, of the Summary of Payments section on Page 1	here and in section on Page 1\$				

Schedule A	ule A					SCHEDULE A
Pavme	Payments Received		Statement	Statement covers period	CANTROLATION	
			from	09/25/2016	्राह्म (१९३१) स्वासम्	
SEE:INSTR	UCTIONS ON BEVERSE		through	10/22/2016	4/6	
NAME OF	NAME OF SLATE MAILER ORGANIZATION:				I.D NUMBER	
CITIZENS	CITIZENS FOR WATERS				1271833	
(1)	(2)	(6)			(4)	(5)
		(8)	(4)		•	
DATE RECEIVED	IDENTIFICATION OF PERSONS FROM WHOM \$100 OR MORE HAS BEEN RECEIVED (SEE IMPORTANT INSTRUCTIONS ON REVERSE)	NAME, OFFICE SOUGHT, AND JURBDICTION OF CANDIDATE/ NAME, JURSDICTION, AND NUMBER OR LETTER OF BALLOT MEASURE SUPPORTED OR OPPOSED (IF DIFFERENT THAN COLUMN 2)	CHECK BOX TO INDICATE IF PAYMENT WAS RECEIVED TO SUPPORT OR OPPOSE CANDIDATE OR MEASURE INCLUDED IN SLATE MAILER	NDICATE IF ECEIVED TO OPPOSE MEASURE	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE AMOUNT RECEIVED SINCE JANUARY 1 PER CANDIDATE
			SUPPORT:	OPPOSE		
10/19/2016	Safe, Clean Neighborhood Parks And Open Space for All		×		7500.00	7500.00
_		Los Angeles County				
	Los Angeles CA 90017 Reference No:	<				
10/19/2016	10/19/2016 Yes On The Los Angeles County Traf - fic Improvement Plan		×		35000.00	35000.00
-		Los Angeles County				
	Los Angeles CA 90017 Reference No:	Σ		·	• • •	
10/21/2016	Saves Lives California, A Coalition of Doctors, Dentists, Health Plans, Labor, And	Non-Profit Health Advocate Organizations	×		10000.00	10000.00
_		Statewide				
	Sacramento CA 95814 Reference No:	56			·	
Summary	2		97	SUBTOTAL \$	155000.00	
1. Amount	1. Amount Received - Payments of \$100 or More	•	-			
(Include	s all Schedule A subtotals)					
2. Amount Recei (Not itemized)	Amount Received - Payments of Less than \$100 (Not itemized)			1		
3. Total Pa Column	Total Payments Received (Line 1 + Line 2) Enter here and in Column A, Line 1, of the Summary of Payments section on Page 1	rhere and in section on Page 1				
	•					

SCHEDULE B

Statement covers period

~	Made
hedule	yments
SC	P

Dayments Made	Statement covers period	ers period SAMEORNIA	700
	(160 mon)	09/25/2016 (REP. FORT)	
SEE INSTRUCTIONS ON REVERSE	through 10/	10/22/2016 5/6	
NAME OF SLATE MAILER ORGANIZATION:		I.D NUMBER	
CITIZENS FOR WATERS		1271833	
NAME AND STREET ADDRESS OF PAYEE	DESCRIPTION OF PAYMENT	AMOUNT PAID	
Gould & Orellana, LLC	Political Reporting Services	2500.00	
Long Beach CA 90802			:

\$ 2500.00	00.0	0 <u>0.</u> 00	00.
SUBTOTAL	2500,00		2500.00
Summary	1. Payments of \$100 or More (Include all Schedule B subtotals)	2. Payments under \$100 This Period (Not itemized) \$	3. Total Payments This Period (Line 1 + Line 2). Enter here and in Column A, Line 2, of the Summary of Payments section on Page 1.

SCHEDULEC

Schedule C Persons Rect \$1,000 Or Mo

Statement covers period	CONTROLLING /
from 09/25/2016	2333
through 10/22/2016	
	I.D. NUMBER
	1271833

You must identify each individual listed on your Statement of Organization (Form 400) who received, directly or indirectly, \$1,000 or more from the organization during the period. (See Instructions on reverse regarding "indirect" payments.)

NAMES OF INDIVIDUALS RECEIVING \$1,000 OR MORE	AMOUNT THIS PERIOD	CUMULATIVE SINCE JANUARY 1
Gould & Orellana, LLC	2500.00	2500.00