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May 31, 2019

Digitally signed by Kathryn Ross
Date: 2019.06.04 17:26:51 -04'00'

VIA EMAIL AND U.S. MAIL

Lisa Stevenson
Acting General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

Re: MUR 7587 – Response to Complaint

Dear Ms. Stevenson:

We write on behalf of Senator Bernie Sanders, Bernie 2016 and Susan Jackson in her official capacity as treasurer, and Bernie 2020, Inc. and Lora Haggard in her official capacity as treasurer (collectively, "Respondents") in response to the complaint filed in the above-referenced matter (the "Complaint").

The Complaint incorrectly asserts that the Respondents violated a Commission regulation that limits the participation of foreign nationals in campaign decision making, 11 C.F.R. § 110.20, when hiring as paid staffers three individuals who qualified and were registered under the Deferred Action for Childhood Arrivals process ("DACA Recipients"). Yet the Complaint sets forth no facts that, even if taken as true, would suggest any foreign national engaged in conduct that would violate the foreign national decision-making prohibition. In fact, none of the campaign staffers identified in the Complaint held any position with influence over the campaigns' administration or decisions about the receipt or expenditure of campaign funds. To the contrary, all staff with either direct or indirect influence over such decisions were citizens or lawful permanent residents of the United States. Moreover, application of the regulatory decision-making prohibition to these individuals – DACA Recipients with no foreign ties or loyalties – would be contrary to the purpose of the regulation and would violate their constitutional rights to free speech, assembly, and political participation. The Supreme Court has recognized that these rights are shared by non-citizens and may not be abridged absent a compelling government interest, and then only through the least-restrictive means possible. Nothing in the Complaint suggests that the conduct in question would satisfy that high standard. Finally, the minimal amount of contributions identified in the Complaint falls well below any reasonable threshold for an enforcement action, as the Commission

routinely has concluded many times before in similar matters. For each of these reasons, the Commission must find no reason to believe a violation occurred and should immediately dismiss the Complaint.[1]

FACTUAL BACKGROUND

DACA Recipients are "undocumented immigrants" brought to the United States as children, who by definition have lived nearly their entire lives, from early youth, within the borders of the United States. DACA Recipients did not migrate voluntarily and never intentionally violated any immigration laws in arriving as they did. DACA Recipients have grown up in the United States. They have known no other home. Their lives are fully woven into the fabric of our society. They owe no allegiance to any government or power other than the United States, and they are as intentionally American as any child of immigrants born within the borders of the United States and its territories.

Nonetheless, the Complainant, Shaun McCutcheon, a purported enthusiast of free speech and broad political participation,[2] here seeks to enlist the Commission in an effort to chill DACA Recipients from participating in political activities in even a subsidiary campaign capacity.[3] The Complaint's attack on this group's speech rights is premised on a few media reports lacking factual detail,[4] the supposedly "high profile" of these particular DACA Recipients,[5] and an unconstitutionally expansive application of a regulatory provision that does not reach the conduct asserted in the Complaint, which it was never intended to prohibit.[6]

The Complaint asserts that Erika Andiola, Cesar Vargas, and Maria Belén Sisa, all DACA Recipients, either currently work or previously worked in various paid positions with the committee Respondents in the 2016 and 2020 presidential election contests.[7] But it offers no material details, beyond their titles and supposed standing within the immigrant community, concerning any decisions they participated in on behalf of the committees. In fact, none of the individual Respondents were engaged in positions that provided them with any basis to influence, directly or indirectly, the decision-making processes of the campaign committees, either on funding or administration.

Each of these three DACA Recipients was hired to serve solely in non-discretionary roles for the respective committees. Specifically, Erika Andiola worked for the 2016 committee as Latino Press

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1 *See* 11 C.F.R. § 111.4(d)(3) (requiring a complaint to contain a clear recitation of facts describing a violation of a statute or Commission regulation).

2 Shaun McCutcheon, Op Ed, *Free Speech May be Protected But Washington Elitism Isn't Funny*, DAILY CALLER (May 7, 2018) ("Political speech in all its forms are [*sic*] something that should be sought after, embraced, and celebrated. . . . There can never be enough speech in the marketplace of ideas."), *available at* https://dailycaller.com/2018/05/07/free-speech-may-be-protected-but-washington-elitism-isnt-funny/.

3 *See* Compl. ¶¶ 12-15.

4 *Id.*

5 *Id.*

6 *See id.* ¶¶ 18-20 (citing 11 C.F.R. § 110.20(i)).

7 *Id.* ¶¶ 12-15.

Secretary, in which capacity she made outward-facing media statements and outreach to the Latino community and built relationships with Spanish-language and Latino media outlets. Her role did not involve decisions concerning campaign funding, expenditures, or the administration of the campaign – the decisions at issue in the decision-making prohibition. As to Cesar Vargas, in 2016 he was a Latino Outreach Deputy Director, where he served as a contact with the Spanish-language and Latino community at community events, engaged in voter outreach to members of those communities, and sought to organize and excite the Latino community base about the campaign. Those activities did not provide him with any influence over decisions about campaign funding or administration, as contemplated by the decision-making prohibition. Finally, in 2016, Maria Belén Sisa served as a Latino Outreach Organizer and was tasked with external community outreach through GOTV rallies in the Latino community – a role with no influence over campaign decisions concerning its funding, expenditures, or administration. And in the 2020 campaign, Ms. Belén Sisa serves as Latino Press Secretary, which again involves outward-facing media statements and outreach to the Latino community and relationship building with Spanish-language and Latino media outlets – a position with no influence over any decision of the campaign committee that would be subject to the decision-making prohibition at section 110.20(i).

The Complainant's cited press and internet articles say nothing to the contrary about the roles of these three DACA Recipients with the campaign committees. Moreover, all of these individuals, like other DACA Recipients, have lived within the United States continuously since their youth, have no home outside the United States or any ability to travel freely outside the United States, and owe no loyalties, express or implied, to any foreign nation. Indeed, the Respondents understand that Mr. Vargas currently holds a green card and is serving in the United States Army, where he has volunteered to defend with his own life the political rights that Mr. McCutcheon now wishes to punish him for seeking to exercise, in the country in which he has spent nearly his entire life.

LEGAL ANALYSIS

1. Because They Curtail Fundamental Constitutional Rights, the Foreign National Prohibition and the Decision-Making Regulation Are Construed Narrowly.

The Act prohibits "foreign nationals" from making "directly or indirectly . . . a contribution or donation of money or other thing of value" in connection with a federal, state, or local election,[8] and conversely makes it unlawful for any person to "solicit, accept, or receive a contribution or donation" from a foreign national.[9] The Act also prohibits foreign nationals from making "directly or indirectly" any "expenditure, independent expenditure, or disbursement for an electioneering communication."[10] The Act defines a "foreign national" as a person who is not a citizen or national of the United States and

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8 52 U.S.C. § 30121(a)(1)(A); *see* 11 C.F.R. § 110.20(b).
9 52 U.S.C. § 30121(a)(2); *see* 11 C.F.R. § 110.20(g).
10 52 U.S.C. § 30121(a)(1)(C); *see* 11 C.F.R. § 110.20(e), (f).

is not lawfully admitted for permanent residence.[11] The origin of that definition is found in the 1974 amendment of the Act (the "1974 Amendment").[12] Sen. Lloyd Bentsen (D-TX) sponsored the 1974 Amendment and explained its purpose, with particular focus on the exemption for resident immigrants:

> I do not think foreign nationals have any business in our political campaigns. They cannot vote in our elections so why should we allow them to finance our elections? *Their loyalties lie elsewhere; they lie with their own countries and their own governments. . . .*
>
> One additional point I should like to mention relates to foreign citizens living in the United States as resident immigrants. My amendment would exempt foreigners with resident immigrant status from the ban on contributions by foreigners. *There are many resident immigrants in the United States who have lived here for years and who spend most of their adult lives in this country; they pay American taxes and for all intents and purposes are citizens of the United States except perhaps in the strictest legal sense of the word. These individuals should not be precluded from contributing. . . .*[13]

The Act itself is silent about the participation of foreign nationals in decision making roles in federal campaign committees. But in implementing the foreign national prohibition, the Commission's regulations provide that a "foreign national shall not direct, dictate, control, or directly or indirectly participate in the decision-making process of any . . . political committee . . . with regard to . . . election-related activities."[14] This decision-making prohibition extends to "decisions concerning the making of contributions, donations, expenditures, or disbursements in connection with elections for any Federal, state, or local office, or decisions concerning the administration of a political committee."[15] The explanation and justification for the decision-making prohibition asserts that it effectuates the Act's bar on "indirect" contributions and expenditures by foreign nationals[16] and was viewed as the least restrictive method of doing so.[17]

When the foreign national prohibition was first enacted in 1974, when it was first implemented by former Section 110.4 in 1989, and when it was most recently revisited with the promulgation of the current rule in 2002 at Section 110.20(i), DACA did not exist. The first version of the DREAM Act was proposed

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11 52 U.S.C. § 30121(b)(2).

12 *See* 120 Cong. Rec. 8782, *et seq.* (Mar. 28, 1974). The Foreign Nation Prohibition was originally codified at 2 U.S.C. § 441e.

13 *Id.* at 8783 (emphasis added).

14 11 C.F.R. § 110.20(i).

15 *Id.*; *see also* Advisory Op. 2004-26 (Weller) (Aug. 20, 2004) (foreign national may work as an uncompensated volunteer for U.S. representative's political committee, but may not make contributions and may not participate in committee's decision-making processes).

16 *See* 2002 E&J, 67 Fed. Reg. 69,943 & n.7.

17 *See id.* at 69,943, 69,946.

to Congress in 2001,[18] but was never passed into law. There is no evidence that the Commission, when implementing the current version of the decision-making prohibition in 2002, re-examined the regulatory definition of "foreign national,"[19] or gave any consideration to the treatment of DREAMers, who were at the time still a hypothetical class of immigrants.

The Commission's regulations are thus silent as to the classification of DACA Recipients for purposes of the foreign national decision-making prohibition, and the Commission has never concluded that the prohibition reaches DACA Recipients at all. As is discussed at greater length below, however, given the regulation's derivation from the foreign national prohibition; given the expressly stated purpose of the resident immigrant exception to cover circumstances that fit DACA Recipients to the letter; and given the constitutional necessity to construe both the Act and implementing regulation narrowly, the decision-making prohibition plainly does not and cannot bar from participation in campaign committee decisions that class of immigrants who qualify as DACA Recipients, any more than it does or could exclude the class of immigrants who are lawful permanent residents.

2. None of the DACA Recipients Identified in the Complaint Engaged in Any Conduct that Falls Within the Scope of the Decision-Making Prohibition.

The facts recited above reflect that none of the three individuals named in the Complaint has ever engaged in paid activities on behalf of the 2016 or 2020 committee that involved either direct or indirect participation in the decision-making process of the committees on election-related activities. All committee decisions regarding funding and administration of the respective campaigns were at all times the exclusive province of United States citizens or green-card holders. The Complaint offers no facts to suggest anything to the contrary.

The Commission has long recognized that its regulatory decision-making prohibition does not extend to every action by every committee staffer. It reaches solely decision-making and management,

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[18] Lawmakers recognized the unique position of DACA Recipients and other similarly situated immigrants ("DREAMers") well before the implementation of DACA itself. As early as 2001, a coalition of bipartisan legislators introduced bills in the House and Senate to protect DREAMers from deportation and provide them with avenues toward lawful residency. The best known among these was the namesake DREAM Act (full name Development, Relief, and Education for Minors Act), a 2001 Senate Bill sponsored by Sen. Orrin Hatch (R-UT). Over the course of the following decade, the DREAM Act was repeatedly but unsuccessfully reintroduced by legislators in both houses. In 2010, a version of the bill passed a vote of the House, but parallel bills in the Senate stalled to filibusters, falling four, and then five votes short of the 60 votes needed to invoke cloture. As such, the DREAM Act never became law, despite having majority support in both houses of Congress and the backing of the then-President. Given the parliamentary blockade of majority-favored, bipartisan legislation, former President Obama implemented DACA as a means of providing the youngest DREAMers with some of the protections that would have been afforded more broadly under the DREAM Act.

[19] *See* 2002 E&J, 67 Fed. Reg. 69,940 (noting without analysis that the foreign national definition remains unchanged and that "[n]o comments addressing this definition were received.").

and only then as to election-related activities.[20] *A fortiori*, it is not adequate merely to assert that the Respondents hired three DACA Recipients, with no indication that those individuals participated in committee decisions, to find reason to believe; there must be some basis for concluding that a covered foreign national participated in committee decisions about covered election-related activities. Such a showing is not only absent in this Complaint, it is contrary to the actual facts, as explained above. The Commission accordingly must find no reason to believe and dismiss the Complaint.

3. Application of the Decision-Making Prohibition to DACA Recipients Would Vitiate Their First Amendment Rights Without Any Compelling Need.

In addition to the lack of actionable facts in the Complaint, the status of the named individuals as DACA Recipients should also take them outside the sweep of the regulatory decision-making prohibition. The Supreme Court and other courts have long recognized that immigrants within the territory of the United States are entitled to constitutional protections, including the First Amendment guarantees of free speech and free assembly:

> The Supreme Court has consistently distinguished between aliens in the United States and those seeking to enter from outside the country, and has accorded to aliens living in the United States those protections of the Bill of Rights that are not, by the text of the Constitution, restricted to citizens. . . . Because we are a nation founded by immigrants, this underlying principle is especially relevant to our attitude toward current immigrants who are a part of our community.[21]

It is equally well settled that election-related activities, including the making of election-related contributions and expenditures, are forms of "political expression" that number among "the most fundamental First Amendment activities" and are therefore afforded the "broadest protection" constitutionally available.[22] The First Amendment further protects political association, with the "recognition that '[e]ffective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association.'"[23] A restriction on an individual's ability to engage

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[20] Advisory Op. 2006-26 (limiting section 110.20(i)'s prohibition to only those activities of the candidate's foreign-national fiancée – who had significant and direct foreign-government ties as a then-current member of the Guatemalan legislature – that involved managing the candidate's committees or participating in election-related decisions).

[21] *American-Arab Anti-Discrimination Committee v. Reno*, 70 F.3d. 1045, 1063-64 (9th Cir. 1995) (concluding that aliens should have First Amendment rights in deportation proceedings); *see also Johnson*, 339 U.S. at 770 (a resident alien is afforded "a generous and ascending scale of rights as he increases his identity with our society"); *Verdugo-Urquidez*, 494 U.S. at 271 (aliens "receive constitutional protections when they have come within the territory of the United States and developed substantial connections with this country"); *Bridges*, 326 U.S. at 161 (an alien "possesses the right to free speech and free press"); *Bluman* 800 F. Supp. 2d at 287 (acknowledging that immigrants have First Amendment rights but noting that they "might be less robust than those of citizens in certain discrete areas").

[22] *Buckley v. Valeo*, 424 U.S. 1, 14 (1976).

[23] *Id.* at 15 (quoting *NAACP v. Alabama*, 357 U. S. 449, 460 (1958)).

in election-related activities with a federal political committee not only limits this freedom of association, but also directly or indirectly curtails the individual's freedom of speech.[24]

Restricting speech is elemental to the foreign national prohibition's core purpose – to prevent *foreign* viewpoints and interests from exerting undue influence over the American democratic process.[25] In general, that purpose addresses a sufficiently compelling government interest as to warrant interference in certain foreign nationals' First Amendment rights.[26] However, in recently upholding the constitutionality of the foreign national prohibition, the leading decision on this prohibition emphasized and relied heavily upon Congress's efforts to tailor the ban narrowly by exempting resident aliens from its reach:

> Congress may reasonably conclude that lawful permanent residents of the United States *stand in a different relationship to the American political community than other foreign citizens do*. Lawful permanent residents have a long-term stake in the flourishing of American society, whereas temporary resident foreign citizens by definition have only a short-term interest in the national community. . . . Temporary resident foreign citizens by definition have primary loyalty to other national political communities, many of which have interests that compete with those of the United States. Apart from that, lawful permanent residents share important rights and obligations with citizens; for example, lawful permanent residents may – and do, in large numbers – serve in the United States military. In those two ways – their indefinite residence in the United States and their eligibility for military service – lawful permanent residents can be viewed as more similar to citizens than they are to temporary visitors, and thus Congress's decision to exclude them from the ban on foreign nationals' contributions and expenditures does not render the statute underinclusive. *In fact, one might argue that Congress's carve-out for lawful permanent residents makes the statute more narrowly tailored to the precise interest that it is designed to serve – namely, minimizing foreign participation in and influence over American self-government.*[27]

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[24] *See Citizens United v. FEC*, 558 U.S. 310, 339 (2010) (a "prohibition on corporate independent expenditures is thus a ban on speech"); *id.* at 386 (freedom of speech originally intended to encompass "the freedom to speak in association with other individuals, including association in the corporate form") (Scalia, J., concurring).

[25] *See* 120 Cong. Rec. 8783 (purpose of Foreign National Prohibition is to prevent individuals whose "loyalties lie elsewhere . . . from trying to control our politics").

[26] *See Bluman*, 800 F. Supp. 2d at 290-91, *aff'd* 565 U.S. 1104 (2012) ("[T]he Supreme Court has said that '[a]liens are by definition those outside of this community.' The compelling interest that justifies Congress in restraining foreign nationals' participation in American elections [is] preventing foreign influence over the U.S. government.") (quoting *Cabell v. Chavez–Salido*, 454 U.S. 432, 439-40 (1982)).

[27] *Bluman*, 800 F. Supp. 2d at 290-91, *aff'd* 565 U.S. 1104 (2012) (quoting *Cabell v. Chavez–Salido*, 454 U.S. 432, 439-40 (1982)) (emphasis added).

Then-Judge Kavanaugh's holding in *Bluman* was expressly affirmed without decision by the Supreme Court and is significant here for two important reasons. First, it acknowledges that the government must identify a "compelling interest" to restrain foreign nationals' participation in American elections, consistent with the strict scrutiny test applicable to content-based restraints on protected First Amendment speech.[28] Second, it regards the Act's resident alien exemption as essential to the "narrow tailoring" analysis, finding that the exclusion of aliens with "a long-term stake in the flourishing of American society" does not serve the "precise interest" of "minimizing foreign participation in and influence over American self-government."[29] These holdings render constitutionally suspect any interpretation of the Act or the derivative regulatory decision-making prohibition that would include DACA Recipients within the definition of "foreign nationals."

DACA Recipients have First Amendment rights, and the Constitution dictates that these rights may only be curtailed when necessary to protect a compelling government interest.[30] While the preservation of American democratic institutions through the prevention of pernicious foreign influence is undoubtedly a compelling interest, like green-card holders, DACA Recipients have a "long-term stake" in American society, owe no allegiance to any foreign country, and are no more likely than any U.S. citizen to expose American democracy to the perils of foreign influence. Strict scrutiny requires that "when the Government seeks to regulate protected speech, the restriction must be the 'least restrictive means among available, effective alternatives.'"[31] Under this constitutional imperative, an interpretation of the Act or the regulation that gratuitously restricts speech by DACA Recipients is constitutionally impermissible if there is a less restrictive alternative. Here, the rationale supporting the critical exclusion from the foreign national prohibition of permanent residents applies with even greater force to the DACA Recipients. The Commission should therefore interpret its regulation narrowly to avoid constitutional infirmities, and should reject the Complainant's invitation to impose his overly broad interpretation on DACA Recipients through the administrative enforcement process.[32]

Nonetheless, the Complaint reflexively cites Advisory Opinion 2006-26 as if it supports its contention that the activities of the Respondents violated the Commission's decision-making regulation.[33] The Complaint's reliance is misplaced. Advisory Opinion 2006-26 involved the application of the

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28 *See Reed v. Town of Gilbert, Ariz.*, 576 U.S. ___, 135 S. Ct. 2218 (2015) ("Content-based laws – those that target speech based on its communicative content – are presumptively unconstitutional and may be justified only if the government proves that they are narrowly tailored to serve compelling state interests"); *Sorrell v. IMS Health*, 564 U.S. 552, 577 (2011) (state law "restraining certain speech by certain speakers" was a content-based restriction subject to strict scrutiny).

29 *Bluman*, 800 F. Supp. 2d at 291.

30 *See id.*

31 *United States v. Alvarez*, 567 U.S. 709, 729 (2012) (statute stricken down as unconstitutional because Court could identify at least one less speech-restrictive alternative).

32 Because the regulations and Act are silent as to whether DACA Recipients are foreign nationals, and because this silence does not imply legislative intent to exclude DACA Recipients from exemption, there is no reason for the Commission to construe the regulation in a constitutionally suspect manner.

33 *See* Complaint ¶¶ 7, 18, 20.

regulatory decision-making prohibition to a foreign national who was a sitting member of the congress of a foreign government. And her presence in the United States was the result of her own calculation, not a decision made by others in her early childhood. The compelling interest in limiting foreign government meddling in the processes of U.S. democratic self-governance could not have been more starkly presented than it was under those facts. DACA Recipients, however, are by definition a unique class of immigrants, not natively beholden to any foreign government and who, if anything, are even less likely than green card holders to bear political or ideological loyalty to the government of their places of birth, having lived in those countries only during the innocent and apolitical years of their childhood. If lawful permanent residents are excluded from the reach of the foreign national decision-making prohibition, then so too, for the same reasons, must DACA Recipients be.

4. The Contributions Identified in the Complaint Are *de Minimis* and Warrant Dismissal Under Commission Precedent.

In addition to its factually baseless and legally suspect allegations concerning the employment of DACA Recipients by political committees in non-decision making positions, the Complaint charges that the Respondents violated the Act by accepting a grand total of $36 in low-dollar contributions from Ms. Belén Sisa. Even assuming the Commission were to conclude that a DACA Recipient's contributions should be barred by the foreign national prohibition, which implicates serious constitutional concerns as described above, the allegation should be dismissed as *de minimis,* consistent with the Commission's practice in other matters alleging receipt of similarly minimal contribution amounts.[34]

CONCLUSION

Reciting no facts about their actual campaign activities, the Complaint seeks to cast three individuals who immigrated to the United States as innocent children, with no knowledge or natural allegiance to any other nation, as agents of foreign powers whose speech and political participation is to be feared and censored by the government. That was demonstrably not the intent of Congress when it enacted the foreign national prohibition of the Act, nor is it the purpose of the Commission's decision-making regulation. Accordingly, the Commission should find no reason to believe that the Respondents violated the Act or Commission regulations and dismiss the Complaint.

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[34] The Commission has routinely dismissed cases involving foreign national contributions of $100 or less. *See* Factual & Legal Analysis at 2, MURs 7430, 7444, and 7445 (Unknown Respondents) (dismissing aggregate foreign national contributions totaling $30); Factual & Legal Analysis at 8, MURs 6962 and 6982 (Hillary for America, et al.; Project Veritas, et al.) (dismissing foreign national contribution violation in the range of $35 to $45); Factual & Legal Analysis at 3, MUR 6944 (Jose A. Farias, et al.) (dismissing $100 foreign national contributions to candidates for Mayor and City Commissioner in Texas). Recently, the Commission could not agree and closed the file in other matters involving much larger foreign national contributions. *See* EPS Dismissal Report at 2, Pre-MUR 610 (Salman Bhojani, et al.) ($500 foreign national contribution); First General Counsel's Report at 7, MUR 6976 (Johnny W. Streets, Jr., City Council Committee, et al.) ($3,000 in potential foreign national contributions).

Very truly yours,

GARVEY SCHUBERT BARER, P.C.

By: _____
Brad C. Deutsch

FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

CELA

STATEMENT OF DESIGNATION OF COUNSEL
Please use *one* form for each Respondent/Entity/Treasurer
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NAME OF COUNSEL: Brad Deutsch

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The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

5/2/2016 Bernard Sanders, Candidate
Date **Respondent/Agent -Signature** **Title(Treasurer/Candidate/Owner)**

RESPONDENT: Senator Bernard Sanders
(Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS:
(Please Print)

Burlington, VT 05408

TELEPHONE- HOME ( ) Compliance@BernieSanders.com

BUSINESS (855) 423-7643

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation

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FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL
Please use *one* form for each Respondent/Entity/Treasurer
FAX (202) 219-3923

MUR # Blanket

NAME OF COUNSEL: Brad Deutsch

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The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

4/21/16 _____, Treasurer
Date **Respondent/Agent -Signature** **Title(Treasurer/Candidate/Owner)**

RESPONDENT: Bernie 2016
(Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: P.O. Box 905
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Burlington, VT 05402

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BUSINESS (855) 423-7643

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FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

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AR/MUR/RR/P-MUR# Blanket

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The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

07/18/2019 (Signature - Respondent/Agent/Treasurer) Treasurer
Date Title

Lora Haggard
(Name – Please Print)

RESPONDENT: Bernie 2020
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

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This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

Rev. 2018