

RECEIVED

By OGC-CELA at 11:52 am, Nov 09, 2020

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November 3, 2020

VIA E-MAIL

Jeff S. Jordan
 Assistant General Counsel
cela@fec.gov
 Federal Elections Commission
 Office of Complaints Examination & Legal
 Administration
 1050 First Street, NE
 Washington DC 20463

Re: MUR 7816

Dear Mr. Jordan:

Our office represents Dan Feehan and the Friends of Dan Feehan campaign committee.¹ We write in response to your October 19, 2020 letter regarding the complaint filed by Congressman Jim Hagedorn. The complaint is meritless and should be dismissed.

The complaint alleges that salary and wage payments to Mr. Feehan from 2017 to 2019 were not paid as compensation for *bona fide* work and, thus, constitute excess campaign contributions to Mr. Feehan's campaign. This is false. Mr. Feehan performed *bona fide* work for both Leadership for Educational Equity ("LEE") and New Politics Leadership Academy ("NPLA") and the salaries and wages he received were paid exclusively as compensation for such work.

As an initial matter, the complaint grossly overstates the payments to Mr. Feehan. The financial disclosures filed with the U.S. House of Representatives on October 31, 2019 initially double counted compensation paid to Mr. Feehan by reflecting the amounts paid in 2019 in the columns for both the current year and the preceding year. *See* Declaration of Daniel Feehan ("Feehan Decl.") at ¶ 2; Ex. 1. Mr. Feehan and his campaign discovered this error and submitted corrected disclosures by September 28, 2020—eleven days before the complaint was signed by Mr. Hagedorn. Feehan Decl. at ¶ 2; Ex. 2. The updated disclosure confirms that Mr. Feehan was paid a total of \$184,500 by LEE and NPLA in 2018 and 2019; not \$349,500 as shown in the initial report. *Id.*

¹ See the enclosed Statement of Designation of Counsel.

Jeffrey S. Jordan
November 3, 2020
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Although the complaint focuses on the payments from LEE and NPLA, it seeks to cast doubt on all compensation paid to Mr. Feehan since 2017. To avoid any doubt regarding the validity of these payments, the following summarizes the *bona fide* work Mr. Feehan performed for each organization:

Leadership for Educational Equity – \$50,000 (2017); \$120,000 (2019)

- In 2017, Mr. Feehan was a consultant for Leadership for Educational Equity (“LEE”) where he was responsible for assisting with LEE’s Veteran’s Initiative. Feehan Decl. at ¶ 5. Specifically, Mr. Feehan worked on developing curriculum and programs to engage Teach for America alumni who were military veterans interested in continuing their public service. *Id.* Mr. Feehan was paid \$50,000 for these services. *Id.* In 2019, Mr. Feehan was employed by LEE where he was responsible for designing a campaign internship program that allowed Teach for America alumni to get experience with political campaigns while also continuing his work assisting with LEE’s Veteran’s Initiative. *Id.* Mr. Feehan was paid \$120,000 for these services. *Id.* Mr. Feehan’s compensation from LEE was paid completely independent of his candidacy. *Id.*

Sheffield Asset Management LLC – \$875 (2017)

- In 2017, Mr. Feehan was a consultant for Sheffield Asset Management LLC where he reviewed and provided feedback for Department of Defense procurement procedures. Feehan Decl. at ¶ 6. Mr. Feehan was paid \$875 for these services. *Id.* Mr. Feehan’s compensation from Sheffield Asset Management was paid completely independent of his candidacy. *Id.*

Wildflower Schools – \$900 (2017)

- In 2017, Mr. Feehan was a consultant for Wildflower Schools where he was responsible for developing a program to help qualified military spouses gain licensure as Montessori teachers and determining the locations where the programs should be launched and expanded. Feehan Decl. at ¶ 7. Mr. Feehan was paid \$900 for these services. *Id.* Mr. Feehan’s compensation from Wildflower Schools was paid completely independent of his candidacy. *Id.*

Center for New American Security – \$7,916 (2017); \$55,412 (2018)

- In 2017 and 2018, Mr. Feehan was a Senior Adjunct Fellow for the Center for New American Security (“CNAS”) where he was responsible for contributing to and writing various research projects for CNAS focused on civil-military relations. Feehan Decl. at ¶ 8. Mr. Feehan was paid a total of \$63,328 (\$7,916 in 2017 and \$55,412 in 2018) for these services. *Id.* Mr. Feehan’s compensation from CNAS was paid completely independent of his candidacy. *Id.*

Jeffrey S. Jordan
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Page 3

New Politics Leadership Academy – \$9,000 (2018); \$55,500 (2019)

- After the November 2018 general election and in 2019, Mr. Feehan was a Senior Fellow for New Politics Leadership Academy (“NPLA”) where he researched the effects of the “urban-rural” divide using his experience as a candidate for Congress in 2018 along with sophisticated regression analysis. Feehan Decl. at ¶ 9. In addition, Mr. Feehan led trainings as a co-facilitator for NPLA’s “Foundations” program, which provides leadership training and support for military veterans, AmeriCorps alumni, and Peace Corps alumni considering running for public office in the future. *Id.* Mr. Feehan was paid a total of \$64,500 for these services. *Id.* Mr. Feehan’s compensation from NPLA was paid completely independent of his candidacy. *Id.*

All compensation paid to Mr. Feehan since 2017 was the result of *bona fide* employment that is genuinely independent of his candidacy and was made exclusively in consideration for the services Mr. Feehan provided to each organization. There is no basis to conclude that Mr. Feehan violated the Federal Election Campaign Act and, therefore, the complaint should be dismissed.

Please feel free to contact me with any questions.

Thank you.

Very truly yours,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.



Charles N. Nauen

Enclosures

c: D. Feehan
Friends of Dan Feehan
D. Zoll



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

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7816

Name of Counsel: Charles Nauen + David Zoll

Firm: Lockridge Grindal Nauen

Address: 100 Washington Ave S. Suite 2200
Minneapolis, MN, 55401

Office#: 612 596 4036 Fax#: 612 339 0981

Mobile#: _____

E-mail: CNNAUEN@LOCKLAW.COM

DJZOLL@LOCKLAW.COM

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.

10/27/2020

Date

[Signature]

(Signature - Respondent/Agent/Treasurer)

CANDIDATE

Title

Daniel Feehan

(Name - Please Print)

RESPONDENT:

DANIEL FEEHAN

(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address:
(Please Print)

PO Box 1844 North Mankato, MN
56002

Home#: _____

Mobile#: _____

Office#: _____

Fax#: _____

E-mail: DAN@DANFEEHAN.COM

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

UNITED STATES
FEDERAL ELECTIONS COMMISSION

MUR 7816

DECLARATION OF DANIEL FEEHAN

I, Daniel Feehan, hereby declare as follows:

1. I am a candidate for election to the Office of United States Representative for Minnesota's First Congressional District. I submit this declaration in response to the complaint filed by Congressman Jim Hagedorn and assigned the file number MUR 7816 by the Federal Elections Commission.

2. A true and correct copy of my Financial Disclosure Report filed with the Clerk of the House of Representatives dated October 31, 2019 is attached hereto as **Exhibit 1**. This Financial Disclosure Report erroneously included compensation paid in 2019 in the column for compensation paid in the preceding year—2018. On September 28, 2020, after noticing this error, I filed an amended Financial Disclosure Report with the Clerk of the House of Representatives. A true and correct copy of the amended Financial Disclosure Report dated September 28, 2020 is attached hereto as **Exhibit 2**.

3. A true and correct copy of my Financial Disclosure Report filed with the Clerk of the House of Representatives dated August 13, 2018 is attached hereto as **Exhibit 3**.

4. A true and correct copy of my Financial Disclosure Report filed with the Clerk of the House of Representatives dated November 28, 2017 is attached hereto as **Exhibit 4**.

5. In 2017, I was a consultant for Leadership for Educational Equity ("LEE") where I was responsible for assisting with LEE's Veteran's Initiative. Specifically, I worked on developing curriculum and programs to engage Teach for America alumni who were military veterans interested in continuing their public service. I was paid \$50,000 for these services. In

2019, I was employed by LEE where I was responsible for designing a campaign internship program that allowed Teach for America alumni to get experience with political campaigns, while also continuing my work assisting with LEE's Veteran's Initiative. I was paid \$120,000 for these services. My compensation from LEE was paid completely independent of my candidacy.

6. In 2017, I was a consultant for Sheffield Asset Management LLC where I reviewed and provided feedback for Department of Defense procurement procedures. I was paid \$875 for these services. My compensation from Sheffield Asset Management was paid completely independent of my candidacy.

7. In 2017, I was a consultant for Wildflower Schools where I was responsible for developing a program to help qualified military spouses gain licensure as Montessori teachers and determining the locations where the programs should be launched and expanded. I was paid \$900 for these services. My compensation from Wildflower Schools was paid completely independent of my candidacy.

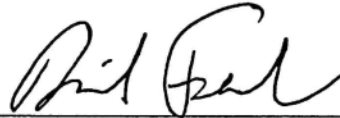
8. In 2017 and 2018, I was a Senior Adjunct Fellow for the Center for New American Security ("CNAS") where I was responsible for contributing to and writing various research projects for CNAS focused on civil-military relations. I was paid a total of \$63,328 (\$7,916 in 2017 and \$55,412 in 2018) for these services. My compensation from CNAS was paid completely independent of my candidacy.

9. After the November 2018 general election and in 2019, I was a Senior Fellow for New Politics Leadership Academy ("NPLA") where I researched the effects of the "urban-rural" divide using my experience as a candidate for Congress in 2018 along with sophisticated regression analysis. In addition, I led trainings as a co-facilitator for NPLA's "Foundations" program, which provides leadership training and support for military veterans, AmeriCorps

alumni, and Peace Corps alumni considering running for public office in the future. I was paid a total of \$64,500 for these services. My compensation from NPLA was paid completely independent of my candidacy.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 2nd day of November, 2020, North Mankato, Minnesota.

A handwritten signature in black ink, appearing to read "Dan Feehan", written over a horizontal line.

Daniel Feehan



Filing ID #10029720

FINANCIAL DISCLOSURE REPORT

Clerk of the House of Representatives • Legislative Resource Center • 135 Cannon Building • Washington, DC 20515

FILER INFORMATION

Name: Daniel Feehan
Status: Congressional Candidate
State/District: MN01

FILING INFORMATION

Filing Type: Candidate Report
Filing Year: 2019
Filing Date: 10/31/2019

SCHEDULE A: ASSETS AND "UNEARNED" INCOME

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Emerging Markets Fund (USEMX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Growth & Income Fund (USGRX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Growth Fund (USAAX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA High Income Fund (USHYX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Income Fund (USAIX) [5P]		\$1 - \$1,000	Tax-Deferred		

EXHIBIT 1

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Income Stock Fund (USISX) [5P]		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Intermediate-Term Fund (USIBX) [5P]		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA International Fund (USIFX) [5P]		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Short-Term Bond Fund (USSBX) [5P]		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Small Cap Stock Fund (USCAX) [5P]		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Value Fund (UVALX) [5P]		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
DC Public Schools 401(a) Defined Contribution Retirement Plan ⇒ Vanguard Retire 2050 Fund [PE]	SP	\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Emerging Markets Fund (USEMX) [5P]					
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Growth & Income Fund (USGRX) [5P]		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive		\$1,001 - \$15,000	Tax-Deferred		

EXHIBIT 1

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
Portfolio / College Savings Plan ⇒ USAA Growth Fund (USAAX) [5P] LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA High Income Fund (USHYX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Income Fund (USAIX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Income Stock Fund (USISX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Intermediate-Term Fund (USIBX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA International Fund (USIFX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Short-Term Bond Fund (USSBX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Small Cap Stock Fund (USCAX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Value Fund (UVALX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Federal Savings Bank Checking and Savings Accounts [BA]	JT	\$50,001 - \$100,000	Interest	\$1 - \$200	None

EXHIBIT 1

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
USAA Roth IRA ⇒ USCRX Cornerstone Moderately Aggressive Fund [IH]		\$1,001 - \$15,000	Tax-Deferred		

* Asset class details available at the bottom of this form. For the complete list of asset type abbreviations, please visit <https://fd.house.gov/reference/asset-type-codes.aspx>.

SCHEDULE C: EARNED INCOME

Source	Type	Amount Current Year to Filing	Amount Preceding Year
LEE	Salary	\$120,000.00	\$120,000.00
New Politics Leadership Academy	Fellowship	\$55,500.00	\$64,000.00
DCPS	Spouse salary	N/A	N/A
TNTP	Spouse salary	N/A	N/A

SCHEDULE D: LIABILITIES

Owner	Creditor	Date Incurred	Type	Amount of Liability
	Navient	2011-2013	Graduate Student Loans	\$50,001 - \$100,000
JT	USAA	2019	Car loan	\$15,001 - \$50,000

SCHEDULE E: POSITIONS

None disclosed.

SCHEDULE F: AGREEMENTS

None disclosed.

SCHEDULE J: COMPENSATION IN EXCESS OF \$5,000 PAID BY ONE SOURCE

None disclosed.

SCHEDULE A ASSET CLASS DETAILS

- Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan
LOCATION: NV
- DC Public Schools 401(a) Defined Contribution Retirement Plan
- USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan

EXHIBIT 1

LOCATION: NV

- o USAA Roth IRA

EXCLUSIONS OF SPOUSE, DEPENDENT, OR TRUST INFORMATION

Trusts: Details regarding "Qualified Blind Trusts" approved by the Committee on Ethics and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or dependent child?

☐ Yes ☒ No

Exemption: Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption?

☐ Yes ☒ No

CERTIFICATION AND SIGNATURE

☒ I CERTIFY that the statements I have made on the attached Financial Disclosure Report are true, complete, and correct to the best of my knowledge and belief.

Digitally Signed: Daniel Feehan , 10/31/2019



FINANCIAL DISCLOSURE REPORT

Clerk of the House of Representatives • Legislative Resource Center • 135 Cannon Building • Washington, DC 20515

FILER INFORMATION

Name: Daniel Feehan
Status: Congressional Candidate
State/District: MN01

FILING INFORMATION

Filing Type: Amendment Report
Filing Year: 2019
Filing Date: 09/28/2020

SCHEDULE A: ASSETS AND "UNEARNED" INCOME

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
USAA Federal Savings Bank Checking and Savings Accounts [BA]	JT	\$50,001 - \$100,000	Interest	\$1 - \$200	None
Age-Based Option 5-6: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Emerging Markets Fund (USEMX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 5-6: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Growth & Income Fund (USGRX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 5-6: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Growth Fund (USAAX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 5-6: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA High Income Fund (USHYX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 5-6: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Income Fund (USAIX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 5-6: Aggressive Growth Portfolio /		\$1 - \$1,000	Tax-Deferred		

EXHIBIT 2

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
College Savings Plan ⇒ USAA Income Stock Fund (USISX) [5P] LOCATION: NV					
Age-Based Option 5-6: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Intermediate-Term Fund (USIBX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 5-6: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA International Fund (USIFX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
Age-Based Option 5-6: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Short-Term Bond Fund (USSBX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 5-6: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Small Cap Stock Fund (USCAX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
Age-Based Option 5-6: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Value Fund (UVALX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
DC Public Schools 401(a) Defined Contribution Retirement Plan ⇒ Vanguard Retire 2050 Fund [PE]	SP	\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 9-10: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Emerging Markets Fund (USEMX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 9-10: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Growth & Income Fund (USGRX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 9-10: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Growth Fund (USAAX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 9-10: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA High Income Fund (USHYX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		

EXHIBIT 2

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
USAA Age-Based Option 9-10: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Income Fund (USAIX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 9-10: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Income Stock Fund (USISX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
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USAA Age-Based Option 9-10: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Small Cap Stock Fund (USCAX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 9-10: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Value Fund (UVALX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Roth IRA ⇒ USCRX Cornerstone Moderately Aggressive Fund [IH]		\$1,001 - \$15,000	Tax-Deferred		

* Asset class details available at the bottom of this form. For the complete list of asset type abbreviations, please visit <https://fd.house.gov/reference/asset-type-codes.aspx>.

SCHEDULE C: EARNED INCOME

Source	Type	Amount Current Year to Filing	Amount Preceding Year
LEE	Salary	\$120,000.00	N/A
New Politics Leadership Academy	Fellowship	\$55,500.00	\$9,000.00
DCPS	Spouse salary	N/A	N/A

EXHIBIT 2

Source	Type	Amount Current Year to Filing	Amount Preceding Year
TNTP	Spouse salary	N/A	N/A

SCHEDULE D: LIABILITIES

Owner	Creditor	Date Incurred	Type	Amount of Liability
	Navient	2011-2013	Graduate Student Loans	\$50,001 - \$100,000
JT	USAA	2019	Car loan	\$15,001 - \$50,000

SCHEDULE E: POSITIONS

None disclosed.

SCHEDULE F: AGREEMENTS

None disclosed.

SCHEDULE J: COMPENSATION IN EXCESS OF \$5,000 PAID BY ONE SOURCE

None disclosed.

SCHEDULE A ASSET CLASS DETAILS

- o Age-Based Option 5-6: Aggressive Growth Portfolio / College Savings Plan
LOCATION: NV
- o DC Public Schools 401(a) Defined Contribution Retirement Plan
- o USAA Age-Based Option 9-10: Moderately Aggressive Portfolio / College Savings Plan
LOCATION: NV
- o USAA Roth IRA

EXCLUSIONS OF SPOUSE, DEPENDENT, OR TRUST INFORMATION

Trusts: Details regarding "Qualified Blind Trusts" approved by the Committee on Ethics and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or dependent child?

☐ Yes ☒ No

Exemption: Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption?

☐ Yes ☒ No

COMMENTS**CERTIFICATION AND SIGNATURE**

☒ I CERTIFY that the statements I have made on the attached Financial Disclosure Report are true, complete, and correct to the best of my knowledge and belief.

Digitally Signed: Daniel Feehan , 09/28/2020



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 19, 2020

VIA EMAIL

bkanfer@danfeehan.com

Daniel Feehan
P.O. Box 1844
North Mankato, MN 83646

RE: MUR 7816

Dear Mr. Feehan:

The Federal Election Commission (FEC) received a complaint that indicates you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 7816. Please refer to this number in all future correspondence.

The Act affords you the opportunity to demonstrate in writing that no action should be taken against you in this matter. If you wish to file a response, you may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Where appropriate, statements should be submitted under oath by persons with relevant knowledge. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and § 30109(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share information on a confidential basis with other law enforcement agencies.¹

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission. Please note that you have a legal obligation to preserve all documents, records, and materials relating to the subject matter of the complaint until such time as you are notified that the Commission has closed its file in this matter. *See* 18 U.S.C. § 1519.

¹ The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).

EXHIBIT 3

Any correspondence sent to the Commission, such as a response, must be addressed to **one** of the following (note, if submitting via email this Office will provide an electronic receipt by email):

Mail

Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Trace Keeys, Paralegal
1050 First Street, NE
Washington, DC 20463

OR

Email

cela@fec.gov

As indicated in the FEC's Notice found at https://www.fec.gov/resources/cms-content/documents/status_of_fec_operations_8-10-2020.pdf, the office's mailroom is open on a limited basis and, therefore, processing paper correspondence may be delayed. Accordingly, we strongly encourage you to file responses and additional correspondence via email.

If you have any questions, please contact Trace Keeys at (202) 694-1260. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jeff S. Jordan
Assistant General Counsel
Complaints Examination &
Legal Administration

Enclosures:

1. Complaint
2. Procedures
3. Designation of Counsel

RECEIVED
FEDERAL ELECTION COMMISSION
OCTOBER 9, 2020 6:01 PM
OFFICE OF GENERAL COUNSEL

September 28, 2020

MUR 7816

Federal Election Commission
1050 First St NE
Washington, DC 20463

Dear Madam or Sir,

I am writing to file a formal complaint against Dan Feehan, the Democrat candidate for Congress in Minnesota's First District, and the Friends of Dan Feehan campaign committee.

It appears that Mr. Feehan was paid more than \$475,000 to run for Congress by several entities over a two-year period, 2017-19. (See attachment #1)

Mr. Feehan was paid almost a half-million dollars while he was an active candidate for Congress. Because it appears unlikely that Mr. Feehan performed bona fide work for these payments, I am bringing this matter to the Federal Election Commission for investigation.

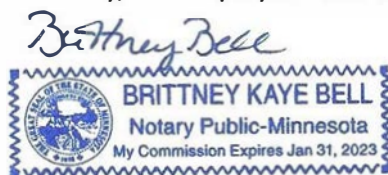
Under FEC statutes, salary and wage payments to a congressional candidate must be justified by bona fide work, or the payments constitute unlawful acceptance of campaign contributions in excess of federal limits (see attachment #2).

Based upon Mr. Feehan's financial disclosure reports to the U.S. House of Representatives (again, see attachment #1), he was paid an extraordinary \$184,000 from August 13, 2018 thru December 31st of that year, \$120,000 from Leadership for Educational Equality and \$64,000 from New Politics Leadership Academy. Working 8 hours per day, every day, weekends included, during that 85 day period would constitute Mr. Feehan being paid \$271 per hour. Such wages cannot be justified based upon any reasonable standard, especially considering Mr. Feehan was waging a full-time campaign for Congress in a closely contested race from August 13 thru November 6th.

During a live KEYC-TV debate, televised on Sunday, September 27, 2020, Mr. Feehan was asked to explain receiving almost \$500,000 from Democrat groups during a two-year period. Mr. Feehan flatly denied he had received any payments. The exchange begins at the 48-minute mark of this KEYC-TV video.

In an October 6, 2019 news article, Mr. Feehan was asked what kind of work he had performed since the 2018 election. Mr. Feehan failed to mention any of the three non-profits that employed him, but instead said he had performed consulting work for the Minnesota Farmers Union, a liberal farming association (see 2019 interview). Yet, Mr. Feehan's financial disclosures reveal no income from the Farmers Union.

Lastly, it has been reported that one of the non-profits who have paid Mr. Feehan, New Politics Leadership Academy, has employed "fellows" who were former candidates, to conduct research



J. Hagedorn
October 9, 2020

EXHIBIT 3

for the organization. Despite this, there is no evidence that research was ever conducted. Of the fellows they were paying, four of the six are currently running for office. All six of the fellows were Democrats despite the organization being bi-partisan (see this [2019 Press Release](#)).

Please investigate this matter so Minnesota's First District residents are able to determine if Dan Feehan has or has not taken unlawful campaign contributions and was given over \$475,000 in a scheme to pay him to run for Congress.

Thank you,

J - Hagedorn - October 9, 2020

Jim Hagedorn
222 West 8th Street
Blue Earth, Minnesota
(507) 351-7799

Subscribed and sworn before me this October 9th, 2020.

Brittney Belle

*Faribault County MN
Exp. Jan 31, 2023*

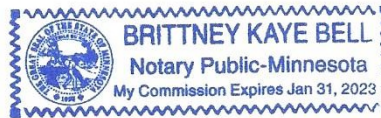


EXHIBIT 3

Income	2017	2018	2019	2020 (thru 4/20)
LEE	50,000	120,000	120,000	
Wildflower School (former TfA CEO)	900			
Sheffield Management (Chicago)	875			
Center for New American Security	7916	55,412		
New Politics Leadership Academy		64,000	55,500	
The New Teacher Proj - TNTP (Amy)		N/A	N/A	N/A
DC Schools (Amy)	N/A	N/A	N/A	
TOTAL	61708	239,412	175,500	0

Disclosure Date	Time Period	
11/28/2017	1/1/2016-10/31/2017	
5/11/2018	90 day extension	
8/13/2018	2018	
10/31/2019	2019	
4/30/2020	2020	



Filing ID #10019342

FINANCIAL DISCLOSURE REPORT

Clerk of the House of Representatives • Legislative Resource Center • 135 Cannon Building • Washington, DC 20515

FILER INFORMATION

Name: Daniel Feehan
Status: Congressional Candidate
State/District: MN01

FILING INFORMATION

Filing Type: Candidate Report
Filing Year: 2017
Filing Date: 11/28/2017
Period Covered: 01/01/2016– 10/31/2017

SCHEDULE A: ASSETS AND "UNEARNED" INCOME

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Emerging Markets Fund (USEMX) LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Growth & Income Fund (USGRX) LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Growth Fund (USAAX) LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA High Income Fund (USHYX) LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒		\$1 - \$1,000	Tax-Deferred		

EXHIBIT 3

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
USAA Income Fund (USAIX)					
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Income Stock Fund (USISX)		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Intermediate-Term Fund (USIBX)		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA International Fund (USIFX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Short-Term Bond Fund (USSBX)		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Small Cap Stock Fund (USCAX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Value Fund (UVALX)		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
DC Public Schools 401(a) Defined Contribution Retirement Plan ⇒ Vanguard Retire 2050 Fund	SP	\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Emerging Markets Fund (USEMX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Growth & Income Fund (USGRX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					

EXHIBIT 3

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Growth Fund (USAAX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA High Income Fund (USHYX)		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Income Fund (USAIX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Income Stock Fund (USISX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Intermediate-Term Fund (USIBX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA International Fund (USIFX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Short-Term Bond Fund (USSBX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Small Cap Stock Fund (USCAX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Value Fund (UVALX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Federal Savings Bank Checking and Savings Accounts	JT	\$15,001 - \$50,000	Interest	\$1 - \$200	None

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
USAA Roth IRA ⇒ USCRX Cornerstone Moderately Aggressive Fund		\$1,001 - \$15,000	Tax-Deferred		

* Asset class details available at the bottom of this form.

SCHEDULE C: EARNED INCOME

Source	Type	Amount Current Year to Filing	Amount Preceding Year
District of Columbia Public Schools	Spouse Salary	N/A	N/A
Leadership for Educational Equity	Consulting project	\$50,000.00	N/A
Sheffield Asset Management LLC	Consulting project	\$875.00	N/A
Wildflower Schools	Consulting project	\$900.00	N/A

SCHEDULE D: LIABILITIES

Owner	Creditor	Date Incurred	Type	Amount of Liability
JT	USAA	November 2017	Credit Card Balance	\$15,001 - \$50,000

SCHEDULE E: POSITIONS

Position	Name of Organization
Adjunct Senior Fellow	Center for a New American Security

SCHEDULE F: AGREEMENTS

None disclosed.

SCHEDULE J: COMPENSATION IN EXCESS OF \$5,000 PAID BY ONE SOURCE

None disclosed.

SCHEDULE A ASSET CLASS DETAILS

<ul style="list-style-type: none"> Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan LOCATION: NV DC Public Schools 401(a) Defined Contribution Retirement Plan
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EXHIBIT 3

- USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan
LOCATION: NV
- USAA Roth IRA

EXCLUSIONS OF SPOUSE, DEPENDENT, OR TRUST INFORMATION

Trusts: Details regarding "Qualified Blind Trusts" approved by the Committee on Ethics and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or dependent child?

☐ Yes ☒ No

Exemption: Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption?

☐ Yes ☒ No

CERTIFICATION AND SIGNATURE

☒ I CERTIFY that the statements I have made on the attached Financial Disclosure Report are true, complete, and correct to the best of my knowledge and belief.

Digitally Signed: Daniel Feehan , 11/28/2017



Filing ID #10022321

FINANCIAL DISCLOSURE REPORT

Clerk of the House of Representatives • Legislative Resource Center • 135 Cannon Building • Washington, DC 20515

FILER INFORMATION

Name: Daniel Feehan
Status: Congressional Candidate
State/District: MN01

FILING INFORMATION

Filing Type: Candidate Report
Filing Year: 2018
Filing Date: 08/13/2018

SCHEDULE A: ASSETS AND "UNEARNED" INCOME

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Emerging Markets Fund (USEMX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Growth & Income Fund (USGRX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Growth Fund (USAAX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA High Income Fund (USHYX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Income Fund (USAIX) [5P]		\$1 - \$1,000	Tax-Deferred		

EXHIBIT 3

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Income Stock Fund (USISX) [5P]		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Intermediate-Term Fund (USIBX) [5P]		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA International Fund (USIFX) [5P]		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Short-Term Bond Fund (USSBX) [5P]		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Small Cap Stock Fund (USCAX) [5P]		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Value Fund (UVALX) [5P]		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
DC Public Schools 401(a) Defined Contribution Retirement Plan ⇒ Vanguard Retire 2050 Fund [PE]	SP	\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Emerging Markets Fund (USEMX) [5P]					
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Growth & Income Fund (USGRX) [5P]		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive		\$1,001 - \$15,000	Tax-Deferred		

EXHIBIT 3

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
Portfolio / College Savings Plan ⇒ USAA Growth Fund (USAAX) [5P] LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA High Income Fund (USHYX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Income Fund (USAIX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Income Stock Fund (USISX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Intermediate-Term Fund (USIBX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA International Fund (USIFX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Short-Term Bond Fund (USSBX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Small Cap Stock Fund (USCAX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Value Fund (UVALX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Federal Savings Bank Checking and Savings Accounts [BA]	JT	\$1,001 - \$15,000	Interest	\$1 - \$200	None

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
USAA Roth IRA ⇒ USCRX Cornerstone Moderately Aggressive Fund [IH]		\$1,001 - \$15,000	Tax-Deferred		

* Asset class details available at the bottom of this form. For the complete list of asset type abbreviations, please visit <https://fd.house.gov/reference/asset-type-codes.aspx>.

SCHEDULE C: EARNED INCOME

Source	Type	Amount Current Year to Filing	Amount Preceding Year
District of Columbia Public Schools	Spouse Salary	N/A	N/A
Center for a New American Security	Research/Writing	\$55,412.00	\$7,916.00

SCHEDULE D: LIABILITIES

Owner	Creditor	Date Incurred	Type	Amount of Liability
	Navient	2011-2013	Graduate Student Loans	\$50,001 - \$100,000

SCHEDULE E: POSITIONS

Position	Name of Organization
Adjunct Senior Fellow	Center for a New American Security

SCHEDULE F: AGREEMENTS

None disclosed.

SCHEDULE J: COMPENSATION IN EXCESS OF \$5,000 PAID BY ONE SOURCE

None disclosed.

SCHEDULE A ASSET CLASS DETAILS

- Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan
LOCATION: NV
- DC Public Schools 401(a) Defined Contribution Retirement Plan
- USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan
LOCATION: NV
- USAA Roth IRA

EXHIBIT 3

EXCLUSIONS OF SPOUSE, DEPENDENT, OR TRUST INFORMATION

Trusts: Details regarding "Qualified Blind Trusts" approved by the Committee on Ethics and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or dependent child?

☐ Yes ☒ No

Exemption: Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption?

☐ Yes ☒ No

CERTIFICATION AND SIGNATURE

☒ I CERTIFY that the statements I have made on the attached Financial Disclosure Report are true, complete, and correct to the best of my knowledge and belief.

Digitally Signed: Daniel Feehan , 08/13/2018



Filing ID #10029720

FINANCIAL DISCLOSURE REPORT

Clerk of the House of Representatives • Legislative Resource Center • 135 Cannon Building • Washington, DC 20515

FILER INFORMATION

Name: Daniel Feehan
Status: Congressional Candidate
State/District: MN01

FILING INFORMATION

Filing Type: Candidate Report
Filing Year: 2019
Filing Date: 10/31/2019

SCHEDULE A: ASSETS AND "UNEARNED" INCOME

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Emerging Markets Fund (USEMX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Growth & Income Fund (USGRX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Growth Fund (USAAX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA High Income Fund (USHYX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Income Fund (USAIX) [5P]		\$1 - \$1,000	Tax-Deferred		

EXHIBIT 3

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Income Stock Fund (USISX) [5P]		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Intermediate-Term Fund (USIBX) [5P]		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA International Fund (USIFX) [5P]		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Short-Term Bond Fund (USSBX) [5P]		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Small Cap Stock Fund (USCAX) [5P]		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Value Fund (UVALX) [5P]		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
DC Public Schools 401(a) Defined Contribution Retirement Plan ⇒ Vanguard Retire 2050 Fund [PE]	SP	\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Emerging Markets Fund (USEMX) [5P]					
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Growth & Income Fund (USGRX) [5P]		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive		\$1,001 - \$15,000	Tax-Deferred		

EXHIBIT 3

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
Portfolio / College Savings Plan ⇒ USAA Growth Fund (USAAX) [5P] LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA High Income Fund (USHYX) [5P] LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Income Fund (USAIX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Income Stock Fund (USISX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Intermediate-Term Fund (USIBX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA International Fund (USIFX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Short-Term Bond Fund (USSBX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Small Cap Stock Fund (USCAX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Value Fund (UVALX) [5P] LOCATION: NV		\$1,001 - \$15,000	Tax-Deferred		
USAA Federal Savings Bank Checking and Savings Accounts [BA]	JT	\$50,001 - \$100,000	Interest	\$1 - \$200	None

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
USAA Roth IRA ⇒ USCRX Cornerstone Moderately Aggressive Fund [IH]		\$1,001 - \$15,000	Tax-Deferred		

* Asset class details available at the bottom of this form. For the complete list of asset type abbreviations, please visit <https://fd.house.gov/reference/asset-type-codes.aspx>.

SCHEDULE C: EARNED INCOME

Source	Type	Amount Current Year to Filing	Amount Preceding Year
LEE	Salary	\$120,000.00	\$120,000.00
New Politics Leadership Academy	Fellowship	\$55,500.00	\$64,000.00
DCPS	Spouse salary	N/A	N/A
TNTP	Spouse salary	N/A	N/A

SCHEDULE D: LIABILITIES

Owner	Creditor	Date Incurred	Type	Amount of Liability
	Navient	2011-2013	Graduate Student Loans	\$50,001 - \$100,000
JT	USAA	2019	Car loan	\$15,001 - \$50,000

SCHEDULE E: POSITIONS

None disclosed.

SCHEDULE F: AGREEMENTS

None disclosed.

SCHEDULE J: COMPENSATION IN EXCESS OF \$5,000 PAID BY ONE SOURCE

None disclosed.

SCHEDULE A ASSET CLASS DETAILS

- Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan
LOCATION: NV
- DC Public Schools 401(a) Defined Contribution Retirement Plan
- USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan

EXHIBIT 3

LOCATION: NV

- o USAA Roth IRA

EXCLUSIONS OF SPOUSE, DEPENDENT, OR TRUST INFORMATION

Trusts: Details regarding "Qualified Blind Trusts" approved by the Committee on Ethics and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or dependent child?

☐ Yes ☒ No

Exemption: Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption?

☐ Yes ☒ No

CERTIFICATION AND SIGNATURE

☒ I CERTIFY that the statements I have made on the attached Financial Disclosure Report are true, complete, and correct to the best of my knowledge and belief.

Digitally Signed: Daniel Feehan , 10/31/2019

EXHIBIT 3

Understanding Contributions

Personal Funds of Individuals

Funds from the Candidate

Unlike the other types of contributions listed here, contributions (including loans or advances) made from the candidate's personal funds to his or her campaign are not subject to any limits, though they must still be reported. 110.10; AOs 1991-09, 1990-09 and 1985-33. For further information, see Chapter 4, Section 12, "Candidate's Personal Funds."

Unearned Income and Fringe Benefits

A candidate's salary or wages earned from *bona fide* employment are considered his or her personal funds. 100.33. However, compensation paid to a candidate in excess of actual hours worked is generally considered a contribution from the employer. 100.54; see also AO 2000-01. Moreover, under FEC regulations barring personal use of campaign funds, a third party's payment of a candidate's expenses is considered a contribution, unless the payment would have been made irrespective of the candidacy. To be paid "irrespective of the candidacy," and thus not considered a contribution, compensation must:

- Result from *bona fide* employment that is genuinely independent of the candidacy;
- Be exclusively made in consideration for services provided by the employee; and
- Not exceed the amount paid to any other similarly qualified person for the same work over the same period of time.

113.1(g)(6). See AOs 2006-13, 2004-17, 2004-08, 1980-115 and 1979-74.

Note that when a candidate is on leave without pay, the continued payment of fringe benefits (such as health insurance and retirement) may also result in contributions from the employer to the campaign. 114.12(c). (The Commission has made an exception to this rule for employers who had pre-existing policies providing for a limited extension of benefits for individuals who take unpaid leave. See AO 1992-03.)

Advances by Individuals

General Rule

When an individual uses personal funds (or personal credit) to pay for a campaign expense, that payment is generally an in-kind contribution from

that individual. 100.52(a). For example, an in-kind contribution results if a campaign staff member pays for postage, office supplies or campaign materials with personal funds. This rule also applies to payments made by volunteers and by the candidate. Travel expenses later reimbursed by the committee are treated differently. 116.5. See Chapter 7, Section 4, "Travel Cost Exemptions" for more information.

Although such advances are considered in-kind contributions until reimbursed, special reporting rules apply when individuals pay for campaign expenses and later receive reimbursement from the committee. See Chapter 13, Section 13, "Reporting Reimbursed Advances of Personal Funds (Non-Travel)."

Travel Exception

When a campaign staff member, volunteer or the candidate uses personal funds to pay for that individual's own travel expenses (transportation, meals and lodging) incurred on behalf of a candidate, the payments are not considered contributions if they fall under one of two exceptions:

- **Exempt Unreimbursed Travel:** Any individual may spend up to \$1,000 per candidate, per election, on transportation expenses without making a contribution, and volunteers may spend unlimited amounts on meals and lodging in connection with volunteer activity. 100.79.
- **Reimbursed Travel:** Any other payments by individuals for travel expenses are not considered contributions if the committee reimburses them within specified time limits. 116.5(b). See Chapter 7, Section 4, "Travel Cost Exemptions" for more information.

Congressional Staff

The official staff of members of Congress cannot contribute to their employing member's campaign. See 18 U.S.C. §603. As such, it is important for those individuals to avoid advancing any funds to the campaign (e.g., buying stamps for a campaign mailing). See also 18 U.S.C. §602.

For more information about political activity by federal employees, contact the U.S. Office of Special Counsel at 202/254-3600.

Coordinated Communications

If a committee, group or individual pays for a communication that is coordinated with a campaign or

EXHIBIT 3**DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING COMPLAINTS FILED WITH THE
FEDERAL ELECTION COMMISSION**

1050 First Street, NE
Washington, D.C. 20463
EMAIL cela@fec.gov FAX (202) 219-3923

Complaints filed with the Federal Election Commission shall be referred to the Enforcement Division of the Office of the General Counsel, where they are assigned a MUR (Matter Under Review) number and forwarded to Complaints Examination & Legal Administration ("CELA") for processing. Within five days of receipt of the complaint, the Commission shall notify all respondents referenced in the complaint, in writing, that the complaint has been filed, and shall include with such notification a copy of the complaint. Simultaneously, the complainant shall be notified that the complaint has been received. The respondents shall then have 15 days to demonstrate, in writing, that no action should be taken against them in response to the complaint. If additional time is needed in which to respond to the complaint, the respondents may request an extension of time. The request must be in writing and demonstrate good cause as to why an extension should be granted. Please be advised that not all requests are granted.

After the response period has elapsed, cases are prioritized and maintained in CELA. Cases warranting the use of Commission resources are assigned as staff becomes available. Cases not warranting the use of Commission resources are dismissed.

If a case is assigned to a staff person, the Office of the General Counsel shall report to the Commission, making recommendations based upon a preliminary legal and factual analysis of the complaint and any submission made by the respondent. The report may recommend that the Commission: (a) find reason to believe that the complaint sets forth a possible violation of the Federal Election Campaign Act of 1971, as amended, (hereinafter the "Act"); or (b) find no reason to believe that the complaint sets forth a possible violation of the Act and, accordingly, close the file.

If, by an affirmative vote of four Commissioners, the Commission determines that there is reason to believe that a respondent has committed or is about to commit a violation of the Act, the Office of the General Counsel shall open an investigation into the matter. During the investigation, the Commission has the power to subpoena documents, to subpoena individuals to appear for deposition, and to order written answers to interrogatories. A respondent may be contacted more than once by the Commission during this phase.

If during this period of investigation, a respondent indicates a desire to enter into conciliation, the Office of the General Counsel may recommend that the Commission enter into conciliation prior to a finding of probable cause to believe that a violation has been committed. Conciliation is an attempt to correct or prevent a violation of the Act by informal methods of conference and persuasion. Most often, the result of conciliation is an agreement signed by the Commission and the respondent. The Conciliation Agreement must be adopted by four votes of

the Commission in order to become final. After signature by the Commission and the respondent, the Conciliation Agreement is made public within 30 days of closing of the entire file.

If the investigation warrants, and no conciliation agreement has been entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent of his/her intent to recommend that the Commission proceed to a vote on probable cause to believe that a violation of the Act has been committed or is about to be committed. The General Counsel shall send the respondent a brief setting forth his/her position on the legal and factual issues of the case. A response brief stating respondent's position on the issues may be submitted within 15 days of receipt of the General Counsel's Brief. Both briefs are then filed with the Commission Secretary and considered by the Commission. Thereafter, if the Commission determines, by an affirmative vote of four Commissioners, that there is probable cause to believe that a violation of the Act has been committed or is about to be committed, the Commission must conciliate with the respondent for a period of at least 30 days, but not more than 90 days. If the Commission is unable to correct or prevent any violation through conciliation, the Office of the General Counsel may recommend that the Commission file a civil suit to enforce the Act against the respondent. Therefore, the Commission may, upon the affirmative vote of four Commissioners, institute civil action for relief in the United States District Court.

See 52 U.S.C. § 30109 and 11 C.F.R. Part 111.

March 2018



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

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# _____

Name of Counsel: _____

Firm: _____

Address: _____

Office#: _____ Fax#: _____

Mobile#: _____

E-mail: _____

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.

_____	_____	_____
Date	(Signature - Respondent/Agent/Treasurer)	Title

(Name – Please Print)		

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

Mailing Address: _____
(Please Print)

Home#: _____ Mobile#: _____

Office#: _____ Fax#: _____

E-mail: _____

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.



Filing ID #10019342

FINANCIAL DISCLOSURE REPORT

Clerk of the House of Representatives • Legislative Resource Center • 135 Cannon Building • Washington, DC 20515

FILER INFORMATION

Name: Daniel Feehan
Status: Congressional Candidate
State/District: MN01

FILING INFORMATION

Filing Type: Candidate Report
Filing Year: 2017
Filing Date: 11/28/2017
Period Covered: 01/01/2016– 10/31/2017

SCHEDULE A: ASSETS AND "UNEARNED" INCOME

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Emerging Markets Fund (USEMX) LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Growth & Income Fund (USGRX) LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Growth Fund (USAAX) LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA High Income Fund (USHYX) LOCATION: NV		\$1 - \$1,000	Tax-Deferred		
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒		\$1 - \$1,000	Tax-Deferred		

EXHIBIT 4

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
USAA Income Fund (USAIX)					
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Income Stock Fund (USISX)		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Intermediate-Term Fund (USIBX)		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA International Fund (USIFX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Short-Term Bond Fund (USSBX)		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Small Cap Stock Fund (USCAX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan ⇒ USAA Value Fund (UVALX)		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
DC Public Schools 401(a) Defined Contribution Retirement Plan ⇒ Vanguard Retire 2050 Fund	SP	\$1,001 - \$15,000	Tax-Deferred		
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Emerging Markets Fund (USEMX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Growth & Income Fund (USGRX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					

EXHIBIT 4

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Growth Fund (USAAX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA High Income Fund (USHYX)		\$1 - \$1,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Income Fund (USAIX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Income Stock Fund (USISX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Intermediate-Term Fund (USIBX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA International Fund (USIFX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Short-Term Bond Fund (USSBX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Small Cap Stock Fund (USCAX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan ⇒ USAA Value Fund (UVALX)		\$1,001 - \$15,000	Tax-Deferred		
LOCATION: NV					
USAA Federal Savings Bank Checking and Savings Accounts	JT	\$15,001 - \$50,000	Interest	\$1 - \$200	None

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
USAA Roth IRA ⇒ USCRX Cornerstone Moderately Aggressive Fund		\$1,001 - \$15,000	Tax-Deferred		

* Asset class details available at the bottom of this form.

SCHEDULE C: EARNED INCOME

Source	Type	Amount Current Year to Filing	Amount Preceding Year
District of Columbia Public Schools	Spouse Salary	N/A	N/A
Leadership for Educational Equity	Consulting project	\$50,000.00	N/A
Sheffield Asset Management LLC	Consulting project	\$875.00	N/A
Wildflower Schools	Consulting project	\$900.00	N/A

SCHEDULE D: LIABILITIES

Owner	Creditor	Date Incurred	Type	Amount of Liability
JT	USAA	November 2017	Credit Card Balance	\$15,001 - \$50,000

SCHEDULE E: POSITIONS

Position	Name of Organization
Adjunct Senior Fellow	Center for a New American Security

SCHEDULE F: AGREEMENTS

None disclosed.

SCHEDULE J: COMPENSATION IN EXCESS OF \$5,000 PAID BY ONE SOURCE

None disclosed.

SCHEDULE A ASSET CLASS DETAILS

<ul style="list-style-type: none"> Age-Based Option 3-4: Aggressive Growth Portfolio / College Savings Plan LOCATION: NV DC Public Schools 401(a) Defined Contribution Retirement Plan
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- USAA Age-Based Option 7-8: Moderately Aggressive Portfolio / College Savings Plan
LOCATION: NV
- USAA Roth IRA

EXCLUSIONS OF SPOUSE, DEPENDENT, OR TRUST INFORMATION

Trusts: Details regarding "Qualified Blind Trusts" approved by the Committee on Ethics and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or dependent child?

☐ Yes ☒ No

Exemption: Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption?

☐ Yes ☒ No

CERTIFICATION AND SIGNATURE

☒ I CERTIFY that the statements I have made on the attached Financial Disclosure Report are true, complete, and correct to the best of my knowledge and belief.

Digitally Signed: Daniel Feehan , 11/28/2017