

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL’S REPORT

MUR 8236

DATE COMPLAINT FILED: Apr. 2, 2024

DATE OF NOTIFICATIONS: Apr. 9, 2024

DATE OF LAST RESPONSE: Sept. 26, 2024

DATE ACTIVATED: Nov. 5, 2024

EXPIRATION OF SOL: Sept. 9, 2028-
Mar. 12, 2029

ELECTION CYCLE: 2024

COMPLAINANT:

Ann M. Ravel

RESPONDENTS:

Yes on Prop 36 – Californians for Safer
Communities, Sponsored by Golden State
Communities f/k/a Californians to Reduce
Homelessness, Drug Addiction, and Theft,
sponsored by Golden State Communities
Kevin Kiley for Congress and David Bauer in his
official capacity as treasurer
Kevin Kiley

**RELEVANT STATUTES
AND REGULATIONS:**

52 U.S.C. § 30125(e)(1)(B)

11 C.F.R. § 300.2(c), (m)

11 C.F.R. § 300.62

INTERNAL REPORTS CHECKED:

Disclosure Reports

FEDERAL AGENCIES CHECKED:

None

I. INTRODUCTION

The Complaint in this matter alleges that Californians to Reduce Homelessness, Drug
Addiction, and Theft (“CRHDAT”)¹, a state ballot measure committee, Kevin Kiley, a 2024
congressional candidate, and Kevin Kiley for Congress and David Bauer in his official capacity
as treasurer (the “Committee”), Kiley’s principal campaign committee, violated the Federal

¹ CRHDAT changed its name to “Yes on Prop 36 – Californians for Safe Communities, sponsored by Golden State Communities” after the Complaint was filed. *See* Semi-Annual Statement, Recipient Committee (July 29, 2024), <https://cal-access.sos.ca.gov/PDFGen/pdfgen.prg?filingid=2935337&amendid=0>. This Report refers to the Committee as CRHDAT.

1 Election Campaign Act of 1971, as amended (the “Act”). The Complaint alleges that Kiley
2 established, financed, maintained, or controlled (“EFMC’d”) CRHDAT and that, as an entity
3 EFMC’d by an individual holding federal office and federal candidate, CRHDAT impermissibly
4 solicited, received, and spent funds in connection with a state election that were in excess of the
5 Act’s amount limitations and sources prohibitions. The Complaint further alleges that Kiley also
6 violated the Act by soliciting non-federal funds for CRHDAT in connection with a state election
7 and appears to allege that the Committee violated the Act in the same regard with Kiley acting as
8 its agent.

9 Respondents filed separate responses in this matter, all denying the allegations. They
10 argue that Kiley did not EFMC CRHDAT because neither Kiley nor anyone connected to Kiley
11 served on CRHDAT’s board, Kiley only gave CRHDAT modest and infrequent in-kind
12 contributions, and at no time did Kiley have any authority within CRHDAT. The Responses do
13 not address the allegations that Kiley and the Committee solicited non-federal funds.

14 As explained below, it does not appear that CRHDAT, Kiley, or the Committee solicited
15 or received any funds in connection with an election. A state ballot measure is not an election
16 and thus the funds solicited or received for the purpose of advancing the ballot measure are not
17 in connection with an election. And there is no indication from the available information that
18 Respondents otherwise solicited or received funds beyond its ballot measure activities related to
19 any state election. However, there is a question as to whether CRHDAT spent funds in
20 connection with a state election because it made a donation to the “restricted use account” of the
21 California Republican Party. However, even assuming this was in connection with a state
22 election, there is insufficient information to make the predicate finding that Kiley EFMC’d
23 CRDHAT, thus subjecting it to the Act’s amount limitations and source prohibitions. Therefore,

we recommend that the Commission dismiss the allegation that CRHDAT violated 52 U.S.C. § 30125(e)(1)(B) and 11 C.F.R. § 300.62 by soliciting, receiving, and spending non-federal funds in connection with a state election. We also recommend that the Commission dismiss the allegation that Kiley and the Committee violated 52 U.S.C. § 30125(e)(1)(B) and 11 C.F.R. § 300.62 by soliciting non-federal funds in connection with a state election.

II. FACTUAL BACKGROUND

CRHDAT is a California state ballot measure committee that gathered signatures to place Proposition 36 on the California ballot for the 2024 election.² Kevin Kiley is the representative for California's third congressional district and was a 2024 candidate for the same district with Kevin Kiley for Congress as his principal campaign committee.³

The Complaint alleges that Respondents violated the Act by soliciting, receiving, and spending non-federal funds in connection with a state election.⁴ The Complaint alleges that Kiley, as an individual holding federal office and federal candidate, EFMC'd CRHDAT and that as a result, it was subject to restrictions on the amount and type of funds it can solicit, receive, and spend in connection with a state election.⁵ According to the Complaint, CRHDAT allegedly received millions of dollars in contributions from federally impermissible sources.⁶

² Compl. at 2-3 (Apr. 2, 2024); *see* Cal. Sec'y of State, *Yes on Prop 36 – Californians for Safer Communities, Sponsored by Golden State Communities*, <https://cal-access.sos.ca.gov/Campaign/Committees/Detail.aspx?id=1462938&session=2023>. Based on CRHDAT's filings, CRHDAT received approximately \$14 million and spent approximately \$15 million. CRHDAT began operating in late 2023. CRHDAT Committee Campaign Statement (Oct. 27, 2023), <https://cal-access.sos.ca.gov/PDFGen/pdfgen.prg?filingid=2850796&amendid=0>.

³ Compl. at 1; Kevin Kiley, Amended Statement of Candidacy (Nov. 7, 2024), <https://docquery.fec.gov/pdf/268/202411079719936268/202411079719936268.pdf>.

⁴ Compl. at 6.

⁵ *Id.*

⁶ *Id.*

The Complaint alleges that Kiley EFMC'd CRHDAT by making \$28,511.48 in nonmonetary donations to CRHDAT, being involved in its decision-making processes, hosting events and making public appearances with CRHDAT leadership, taking a lead role in CRHDAT's petition gathering and solicitations, and sharing similar personnel between CRHDAT and the Committee, namely that CRHDAT and the Committee share a lawyer and vendors.⁷ Additionally, the Complaint alleges that Kiley "sent numerous emails to urge his constituents and supporters to support the [b]allot [m]easure and provide updates on the initiative" and points to language in Kiley's solicitations on behalf of CRHDAT in which he uses phrases such as "we'll" and "we've."⁸

Both CRHDAT and the Committee deny that Kiley EFMC'd the organization. The Responses state that neither Kiley nor his staff have authority within CRHDAT, that CRHDAT was founded by the Executive Committee of Golden State Communities, on which neither Kiley nor his agents has served, and that the donations from the Committee were not significant, comprising only .53%⁹ of its total receipts.¹⁰

⁷ *Id.* at 5-6.

⁸ *Id.* at 3, 5-6.

⁹ Based on CRHDAT's most recent reports, Kiley's contributions now appear to comprise approximately .31% of the committee's total receipts. CRHDAT reported \$14,117,182.78 in total receipts from November 13, 2023 through November 9, 2024, with \$44,191.27 from the Committee. Yes on 36 – Californians for Safer Communities, Sponsored by Golden State Communities, Contributions Received, SOS.CA.GOV, <https://cal-access.sos.ca.gov/Campaign/Committees/Detail.aspx?id=1462938&session=2023&view=received> (last visited Feb. 4, 2025) (showing 5 of the 6 in-kind contributions from the Committee to CRHDAT); Yes on 36 – Californians for Safer Communities, Sponsored by Golden State Communities, Late Contributions Received, SOS.CA.GOV, <https://cal-access.sos.ca.gov/Campaign/Committees/Detail.aspx?id=1462938&session=2023&view=late1> (last visited Jan. 24, 2025) (showing the final in-kind contribution from the Committee to CRHDAT).

¹⁰ CRHDAT Resp. at 3-4, 10, 12 (Apr. 23, 2024) (explaining that CRHDAT raised \$8,318,013.47 as of April 11, 2024, and that Kiley's campaign made \$44,200.27 in in-kind contributions to CRHDAT); Kevin Kiley for Congress Resp. ("Committee Resp.") at 1-2 (Apr. 26, 2024). CRHDAT reported these contributions as coming from the Committee, *see supra* note 9. The Committee, on the other hand, appears to have reported these as disbursements to "the Monaco Group." *FEC Disbursements: Filtered Results*, FEC.GOV, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00801985&recipient_name=the+

1 **III. LEGAL ANALYSIS**

2 The Act and Commission regulations prohibit candidates, individuals holding Federal
 3 office, agents of a candidate or an individual holding Federal office, or an entity directly or
 4 indirectly EFMC'd by or acting on behalf of one or more candidates or individuals holding
 5 Federal office from soliciting, receiving, directing, transferring, or spending funds in connection
 6 with any election other than an election for federal office unless the funds are not in excess of the
 7 amounts permitted with respect to contributions to candidates and political committees under
 8 52 U.S.C. § 30116(a)(1), (2), and (3), and are not from sources prohibited by the Act from
 9 making contributions in connection with an election for federal office.¹¹

10 The Act defines “election” to mean “a general, special, primary, or runoff election” as
 11 well as “a convention or caucus of a political party which has authority to nominate a
 12 candidate.”¹² Commission regulations define “election” to mean “the process by which
 13 individuals, whether opposed or unopposed, seek nomination for election, or election, to Federal
 14 office.”¹³ The United States Supreme Court has long recognized that the Act “regulates only

[monaco+group&two_year_transaction_period=2024&min_date=01%2F01%2F2024&max_date=04%2F01%2F2024](#)
 4 (last visited Jan. 24, 2025) (showing disbursements to “the Monaco Group” for mass mailers that correspond to the
 date and amounts of in-kind contributions to CRHDAT).

¹¹ 52 U.S.C. § 30125(e)(1)(B); 11 C.F.R. § 300.62. To determine whether a candidate or his or her agent
 “directly or indirectly establishes, finances, maintains, or controls” an entity, the Commission considers a non-
 exhaustive list of ten factors set forth in 11 C.F.R. § 300.2(c)(2), including: (1) whether the candidate or his agent
 has the authority to “direct or participate in the governance of the entity through provisions of constitutions, bylaws,
 contracts, or other rules, or through formal or informal practices or procedures”; (2) whether the candidate or his
 agent has “the authority or ability to hire, appoint, demote, or otherwise control the officers, or other decision-
 making employees or members of the entity”; (3) whether former or present “overlapping officers or employees”
 indicate “a formal or ongoing relationship” between the candidate or his agent and the entity; (4) whether directly or
 through its agent, the candidate had an “active or significant role in the formation of the entity”; as well as any other
 relevant factors, in the context of the overall relationship between the federal candidate or officeholder, or his agent,
 and the entity. 11 C.F.R. § 300.2(c)(2)(i)-(x).

¹² 52 U.S.C. § 30101(1). The definition also includes a primary election held for the selection of delegates to
 a national nominating convention of a political party and for the expression of a preference for the nomination of
 individuals for election to the office of President. *Id.* § 30101(1)(C)(D).

¹³ 11 C.F.R. § 100.2(a); *see also id.* § 100.2(b)-(f) (defining specific types of elections).

1 candidate elections, not referenda or other issue-based ballot measures.”¹⁴ Consistent with this
 2 authority, the Commission has determined that spending relating only to ballot initiatives is
 3 outside the purview of the Act because such spending is not “in connection with” an election.¹⁵
 4 Most recently, in Advisory Opinion 2024-05 (Nevadans for Reproductive Freedom), the
 5 Commission found that a state ballot committee, which was not asking federal candidates to
 6 solicit funds earmarked for federal election activity, could have federal candidates solicit funds
 7 for the committee without regard for the amount limitations or source prohibitions of the Act
 8 because the ballot initiative was not “similar to the type of ‘election’ encompassed in either the
 9 statutory or regulatory definition because it does not involve any individual seeking office.”¹⁶

10 Here, there is insufficient information to suggest that either CRHDAT, Kiley, or the
 11 Committee solicited or received funds in connection with an election given that CRHDAT’s
 12 activities were centered on a ballot initiative. There is a question as to whether CRHDAT might
 13 have spent funds in connection with an election when it made a donation to the California
 14 Republican Party, but it is unclear whether this was “in connection with” an election because the
 15 donation was earmarked for the party’s “restricted use account.” In any event, even if the

¹⁴ *McIntyre v. Ohio Elections Comm’n*, 514 U.S. 334, 356 (1995) (citing *Buckley v. Valeo*, 424 U.S. 1, 80 (1976)); *see also First Nat’l Bank of Boston v. Bellotti*, 435 U.S. 765 (1978) (“Referenda are held on issues, not candidates for public office.”).

¹⁵ Advisory Op. 1989-32 (McCarthy) (“AO 1989-32”) at 3; *see also* AO 2024-05 (Nevadans for Reproductive Freedom) at 4 (“The definitions of ‘election’ in the Act and Commission regulations are limited to individuals seeking office, whereas the ballot initiative process allows voters to directly enact a proposed statute or constitutional amendment.”); AO 1984-62 (B.A.D. Campaigns) at 1 n.2 (“The Commission has previously held that contributions or expenditures exclusively to influence ballot referenda issues are not subject to the Act”); AO 1984-41 (National Conservative Foundation) at 1-2 (finding that a corporation could release ads that did not relate to any election, as it was outside the scope of the Act); AO 1982-10 (Syntex) at 2-3 (finding that a corporation could make contributions or expenditures in connection with ballot measures).

¹⁶ AO 2024-05 at 3-5 (superseding AO 2003-12 (Stop Taxpayer Money for Politicians Committee) that held that activities of a ballot measure committee not EFMC’d by a federal candidate were “‘in connection with any election other than an election for Federal office’ after the committee qualifies an initiative or ballot measure for the ballot”). The Complaint in this matter was filed in April 2024, before the Commission approved AO 2024-05. Certification (May 2, 2024).

1 donation was in connection with an election, there are limited facts to support the predicate
2 finding that Kiley EFMC'd CRHDAT, thus subjecting it to the Act's amount limitations and
3 source prohibitions. Accordingly, there is no basis to find reason to believe that Respondents
4 violated the Act.

5 First, it does not appear that CRHDAT, Kiley, or the Committee solicited or received
6 funds in connection with an election because the conduct here centered on a state ballot measure
7 which does not concern an election. Indeed, the various communications that the Complaint
8 points to involve the promotion of signature gathering for the ballot measure and thus appear
9 unrelated to an election.¹⁷ For instance, Kiley spoke at a CRHDAT event where he told those
10 watching "[w]e are encouraging folks to do, what I'm going to do right now, which is to sign this
11 petition."¹⁸ Regarding the Committee's liability, the Complaint appears to suggest that Kiley
12 was acting on its behalf when he made the solicitation but it provides no specifics. The
13 Complaint alleges that Kiley and the Committee have, through email and social media, "been
14 active in soliciting contributions to CRHDAT," but fails to provide evidence of these
15 solicitations.¹⁹ Similarly, the Complaint points to End47.com, Kiley's blog dedicated to ending
16 Proposition 47, but this page does not appear to solicit funds for CRHDAT.²⁰ In short, we are

¹⁷ Compl. at 3-4 (sending emails to supporters promoting the proposition and providing updates on the number of signatures gathered).

¹⁸ *Id.*; see also Kevin Kiley (@KevinKileyCA), X (Feb. 4, 2024, 6:17 PM), <https://x.com/KevinKileyCA/status/1754283061435638154?mx=2> (There do not appear to be solicitations in the video).

¹⁹ Compl. at 5. The Complaint alleges that Kiley and the Committee used the blog, blast emails, and social media, to solicit funds. *Id.* However, the Complaint fails to attach, and we are unable to find, any evidence of these alleged solicitations.

²⁰ *Id.* at 3. The website's landing page invites visitors to sign up to receive "a petition to sign for the initiative to End Prop. 47." END47, <https://End47.com> (last visited Feb. 3, 2025).

unaware of any information that either CRHDAT, Kiley, or the Committee solicited or received funds on behalf of CRHDAT for a purpose other than the state ballot initiative.

Second, there is a question as to whether CRHDAT spent non-federal funds in connection with a state election. At the outset, it appears that the bulk of the group's spending appears to have been related to efforts to gather signatures for Proposition 36.²¹ Of the \$13.5 million CRHDAT spent during the 2024 election cycle, CRHDAT spent \$8.5 million on circulating petitions.²² However, from mid-September to mid-October of 2024, CRHDAT made an aggregate \$1,500,000 donation to the California Republican Party, but the circumstances of the donations make it unclear whether they were, in fact, made in connection with an election.²³ The donations were earmarked for the party's "restricted use account," meaning that the donations could not be used "for the purpose of making contributions to state candidates or to other committees for the purpose of making contributions to state candidates."²⁴ Pursuant to state law, however, funds could be spent for purposes such as making independent expenditures, contributions to local candidates, contributions to state and local ballot measure committees,

²¹ Yes on Prop 36 – Californians for Safer Communities, Sponsored by Golden State Communities Disbursements, SOS.CA.GOV, <https://cal-access.sos.ca.gov/Campaign/Committees/Detail.aspx?id=1462938&session=2023&view=expenditures> (last visited Dec. 16, 2024) (showing that CRHDAT spent its money on "petition circulating" and "campaign literature and mailings," as opposed to activity that would be considered federal election activity).

²² *Id.*

²³ Yes on Prop 36 – Californians for Safer Communities, Sponsored by Golden State Communities Contributions Made, SOS.CA.GOV, <https://cal-access.sos.ca.gov/Campaign/Committees/Detail.aspx?id=1462938&session=2023&view=contributions> (last visited Feb. 3, 2025) (showing that CRHDAT made three contributions to the California Republican Party).

²⁴ Yes on Prop 36 – Californians for Safer Communities, Sponsored by Golden State Communities, October Monthly Report at 72, 74, 77 (filed Oct. 24, 2024), <https://cal-access.sos.ca.gov/PDFGen/pdfgen.prg?filingid=2972310&amendid=0>; *State Contributions Limits*, CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION at 4 (June 2024), https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/TAD/Campaign%20Manuals/Manual_4/Manual_4_Ch_5_State_Contribution_Limits.pdf.

1 voter registration, and administrative costs.²⁵ While independent expenditures and contributions
 2 to local candidates satisfy the meaning of “in connection with any election other than an election
 3 for Federal office,” it is unclear whether “voter registration” would be covered.²⁶ Here, we do
 4 not have detailed information about the specific contribution to the California Republican Party,
 5 such as whether the contributions were solicited for a specific purpose or whether CRHDAT
 6 further earmarked them for a particular category of spending.

7 In any event, there is insufficient information to demonstrate that CRHDAT was
 8 EFMC'd by Kiley to subject it to the Act's soft money provision in the first place, given the
 9 limited information set forth by the Complaint. At the outset, despite the Complaint's allegation
 10 that Kiley's agent established CRDHAT, the available information shows that Kiley did not
 11 establish CRHDAT; Kiley indicates that he did not learn about CRHDAT “until over two months
 12 after [it] was formed.”²⁷ Additionally, CRHDAT was created by its sponsor organization,
 13 Golden State Communities, which is operated by an 11-person executive committee, none of
 14 whom are Kiley or his agents.²⁸ The Complaint alleges that Kiley has authority within
 15 CRHDAT because he engaged in public communications with CRHDAT, suggesting that he

²⁵ *State Contributions Limits*, CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION at 4 (June 2024),
https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/TAD/Campaign%20Manuals/Manual_4/Manual_4_Ch_5_State_Contribution_Limits.pdf.

²⁶ 52 U.S.C. § 30125(e)(1)(B); *see also* 52 U.S.C. § 30101(20)(A) (defining federal election activity); 11 C.F.R. § 100.24(a), (b) (same). The broad term “federal election activity” includes “voter registration activity” and is listed as within the scope of the prohibition for spending non-federal funds in connection with a federal election under 52 U.S.C. § 30125(e)(1)(A) but no similar term appears for state election activity under 52 U.S.C. § 30125(e)(1)(B) regarding the spending of funds for any election other than a federal election.

²⁷ Committee Resp. at 1.

²⁸ CRHDAT Resp. at 12; CRHDAT Committee Campaign Statement (Oct. 27, 2023), <https://cal-access.sos.ca.gov/PDFGen/pdfgen.prg?filingid=2850796&amendid=0>; Golden State Communities, <https://www.goldenstatecommunities.com/about-us> (last visited Jan. 21, 2025).

controlled the entity.²⁹ However, such activities are not sufficient to conclude that Kiley himself had decision-making control for CRHDAT.³⁰ Similarly, Kiley's use of "we've" and "we'll" in gathering signatures for the petition is insufficient to show Kiley's control of CRHDAT, as such language could simply be a rhetorical device to convey collective agreement.³¹ Moreover, though the Complaint alleges that Kiley obtained nonpublic information about ballot qualification, this does not indicate that Kiley maintained control over CRHDAT; indeed, since Kiley has been involved in the ballot qualification process by mailing petitions he presumably would have access to information related to signature collection thresholds.³²

Additionally, while CRHDAT and the Committee appear to use similar vendors and the same lawyer, there is no reason to infer that the vendors or lawyers were acting on behalf of Kiley or the Committee when providing services to CRHDAT.³³ And there is also no basis to conclude that Kiley financed CRHDAT. Kiley's in-kind contributions were infrequent and insignificant compared to the group's overall receipts. He donated approximately \$44,000 in in-kind contributions to CRHDAT, which currently constitutes only .31% of its receipts.³⁴ This is

²⁹ Compl. at 3, 6 (Kiley hosted a signature gathering event where people associated with CRHDAT were present).

³⁰ *Id.* at 3; CRHDAT Resp. at 9, 11-12.

³¹ CRHDAT Resp. at 12.

³² Committee Resp. at 1.

³³ "[I]t is not enough that there is some relationship or contact between the principal and agent; rather the agent must be acting on behalf of the principal to create potential liability for the principal." AO 2004-25 (Corzine) at n.1 (quoting Explanation and Justification for Final Rules on "Prohibited and Excessive Contributions; Non-Federal Funds or Soft Money," 67 Fed. Reg. 49,064, 49,083 (July 29, 2002)).

³⁴ *Supra* note 9.

far below the amount of money typically required to establish that a candidate financed a committee.³⁵

Accordingly, we recommend that the Commission dismiss the allegations that CRHDAT violated 52 U.S.C. § 30125(e)(1)(B) and 11 C.F.R. § 300.62 by soliciting, receiving, and spending non-federal funds in connection with a state election. We also recommend that the Commission dismiss the allegations that Kiley and the Committee violated 52 U.S.C. § 30125(e)(1)(B) and 11 C.F.R. § 300.62 by soliciting non-federal funds in connection with a state election.

IV. RECOMMENDATIONS

1. Dismiss the allegation that Yes on Prop 36 – Californians for Safe Communities, sponsored by Golden State Communities f/k/a Californians to Reduce Homelessness, Drug Addiction, and Theft, sponsored by Golden State Communities violated 52 U.S.C. § 30125(e)(1)(B) and 11 C.F.R. § 300.62 by soliciting, receiving, and spending federally impermissible funds in connection with a state election;
2. Dismiss the allegation that Kevin Kiley and Kevin Kiley for Congress and David Bauer in his official capacity as treasurer violated 52 U.S.C. § 30125(e)(1)(B) and 11 C.F.R. § 300.62 by soliciting federally impermissible funds in connection with a state election;
3. Approve the attached Factual and Legal Analysis;
4. Approve the appropriate letters; and

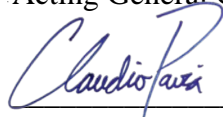
³⁵ The Commission has approached the question of what constitutes a significant amount on a case-by-case basis in view of all the relevant circumstances. It has stated that “amounts that are so large or . . . that comprise such a substantial percentage of the organization’s receipts” would be considered “financing” a committee under 11 C.F.R. § 300.2. AO 2006-04 (Tancredo) at 3. The Commission has concluded that a donation of 50 percent of the total receipts of an organization constitutes “financing,” while donations of 25 percent, in conjunction with other factors indicating a closeness of the entities such as the sharing of polling and strategy, would also constitute “financing. *Id.* at 4-5.

- 1 5. Close the file effective 30 days from the date the certification of this vote is signed (or
2 on the next business day after the 30th day, if the 30th day falls on a weekend or
3 holiday).

4 Lisa J. Stevenson
5 Acting General Counsel

6 February 6, 2025

7 Date



Claudio J. Pavia
Deputy Associate General Counsel for Enforcement

9 *Ana J. Peña-Wallace*

10 Ana J. Peña-Wallace
11 Assistant General Counsel

12 *Jacob McCall*

13 Jacob McCall
14 Attorney

