

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

TU NGUYEN)
3310 N. Braeswood)
Houston, Texas 77025)
Plaintiff)

vs.)

FEDERAL ELECTION COMMISSION)
999 E Street, N.W.)
Washington, D.C. 20463,)
Ref: MUR 7059 Complaint against)
Human Rights for Vietnam Political)
Action Committee ("HRV PAC"))
Saigon Broadcasting Television Network)
("SBTN") Viettan ("VT"))
& Loretta Sanchez ("Loretta"))
Defendant)

Case: 1:17-mc-01048
Assigned To : Walton, Reggie B.
Assign. Date : 4/25/2017
Description: Misc.

COMPLAINT FOR INJUNCTIVE AND DECLARATORY RELIEF

1. This is an action for injunctive and declaratory relief under the Federal Election Campaign Act of 1971 ("FECA" or "the Act"), 52 U.S.C. §30109(a)(8)(C), and the Administrative Procedure Act, 5 U.S.C. §706, challenging as arbitrary, capricious, an abuse of discretion, and contrary to law the dismissal by the Federal Election Commission ("FEC" or "Commission") of an administrative complaint by Tu Nguyen against Human Rights for Vietnam Political Action Committee ("HRV PAC"), Saigon Broadcasting Television Network ("SBTN"), Viettan (aka Viet Tan) and Loretta Sanchez ("Sanchez") for violating the Federal Election Campaign Act of 1971, as amended (the "Act"). Specifically, the complaint covers: (1) potential foreign national contributions to the Sanchez Election Committee (2) potential

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corporate contributions from SBTN to the Sanchez Election Committee and HRV PAC and (3) potential reporting omissions by HRV PAC. This action further challenges a regulation promulgated by the FEC, 11 C.F.R. §109.10(e)(1)(vi), as FEC's response is arbitrary, capricious, and in violation of 52 U.S.C. §30109(a)(8)(C) and 5 U.S.C. § 706(2) because it is inconsistent with a provision of the FECA, 52 U.S.C. §30104(c).

2. The FECA ensures that voters have the right to know the identities of those who pay for independent expenditures in support of or opposition to federal candidates, an interest that is not lessened merely because the contributor may not be aware of the exact form of the final independent expenditure. That interest, moreover, is manifested in the FECA. The Act imposed and continues to impose on HRV PAC, SBTN, VT and Loretta the obligation to disclose the contributors behind its independent expenditures. The FEC's refusal to enforce that obligation constitutes an abuse of discretion, is contrary to law, and warrants reversal by this Court.

JURISDICTION AND VENUE

3. This Court has both subject matter jurisdiction over this action and personal jurisdiction over the parties pursuant to 52 U.S.C. §30109(a)(8)(A) and 5 U.S.C. §702. This Court also has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 2201(a), and 2202. Venue lies in this district under 52 U.S.C. §30109(a)(8)(A) and 28 U.S.C. § 1391(e).

PARTIES

4. Plaintiff, Tu Nguyen, is a citizen of the United States and a resident of the State of Texas. Plaintiff was registered to vote in Texas in 1982 and remains a registered voter in Texas. As a registered voter, plaintiff is entitled to receiving all the information the FECA requires those making independent expenditures to report publicly. He is further entitled to the FEC's proper administration of the provisions of the FECA. Plaintiff is harmed in exercising his right to an informed vote when a person fails to disclose the contributors for his or her spending on independent expenditures in a timely fashion, as the FECA requires.

5. When plaintiff files complaints against violators (SBTN, HRN PAC, Sanchez and Viet Tan) of the FECA, he relies on the FEC, as the exclusive civil enforcement authority, to comply strictly with the FECA when making its enforcement decisions. *See* 52 U.S.C. §30107(e). Plaintiff is harmed and is "aggrieved" party when the FEC summarily dismisses his complaints contrary to the FECA, refuses to enforce the FECA's mandatory disclosure requirements, or otherwise acts contrary to the requirements of the FECA. *See* 52 U.S.C. §30109(a)(8)(C).

6. Plaintiff is also a blogger. Plaintiff is committed to protecting the rights of citizens to be informed about the activities of government officials, ensuring the integrity of government officials, protecting our political system against corruption, and reducing the influence of money in politics. Plaintiff aims to advance reforms in the areas of campaign finance, lobbying, ethics, and transparency. Further, plaintiff seeks to ensure that campaign finance laws are properly interpreted, enforced, and implemented.

7. To advance his mission, plaintiff uses a combination of research, litigation, advocacy, and public education to disseminate information to the public about public officials and their actions, and the outside influences that have been brought to bear on those actions. A core part of

this work is examining and exposing the special interests that have influenced our elections and elected officials and using that information to educate voters regarding the integrity of public officials, candidates for public office, the electoral process and our system of government.

8. Toward this end, plaintiff monitors the activities of those who run for federal office as well as those groups financially supporting candidates for office or advocating for or against their election. Plaintiff reviews campaign finance reports that groups, candidates, and political parties file with the FEC disclosing their expenditures and, in some cases, their contributors. Using the information in those reports, plaintiff, through his website, press releases, reports, and other methods of distribution, publicizes the role of these individuals and entities in the electoral process and the extent to which they have violated federal campaign finance laws.

9. Plaintiff also files complaints with the FEC when he discovers violations of the FECA. Publicizing violations of the FECA and filing complaints with the FEC serve plaintiff's mission of keeping the public, and voters in particular, informed about individuals and entities that violate campaign finance laws, which helps to deter future violations of campaign finance laws.

10. Plaintiff is hindered in carrying out his core programmatic activities when those individuals and entities that attempt to influence elections and elected officials are able to keep their identities hidden. Likewise, the FEC's refusal to properly administer the campaign finance laws, particularly the FECA's reporting requirements, hinders plaintiff in his programmatic activities, as compliance with those reporting requirements often provides plaintiff with the only source of information about those individuals and groups funding the political process. As a result of the FEC's refusal to enforce the FECA's disclosure provisions, organizations like SBTN, HRV PAC, Sanchez and Viet Tan have been able to pour vast amounts of "dark" or anonymous money into the political system without revealing the source of that money. This

deprives plaintiff of information critical to advancing his ongoing mission of educating the public to ensure the public continues to have a vital voice in our political process and government decisions.

11. Plaintiff is also concerned by the misuse of contributions by U.S. citizens for illicit purposes, such as to fund members of a foreign political party with a history of violence to operate in a foreign country.

12. Defendant FEC is the federal agency established by Congress to oversee the administration and civil enforcement of the FECA. *See* 52 U.S.C. §§ 30106, 30106(b)(1).

STATUTORY AND REGULATORY FRAMEWORK

Independent Expenditure Disclosure

13. 52 U.S. Code §30118(a); see also U.S. Code §30118(A)(i): The Act and Commission regulations prohibit any corporation from making a contribution in connection with a Federal election, and prohibit any candidate or political committee from knowingly accepting or receiving such a contribution, including all in-kind contributions.

14. 52 U.S.C. §30125(e)(1)(A); see also 11 C.F.R. §300.61: The Act provides that a contribution includes "any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office." 52 U.S.C. §30101 (8)(A). The term "person" for purposes of the Act and Commission regulations includes partnerships, corporations, and "any other organization or group of persons." *Id.* § 30101(11); 11C.F.R. §100.10.

15. The FECA and FEC regulations impose a number of disclosure and other requirements on those making independent expenditures.

16. The FECA and FEC regulations define an "independent expenditure" as "expenditure by

a person. . . expressly advocating the election or defeat of a clearly identified candidate. . . that is not made in concert or cooperation with or at the request or suggestion of such candidate. . .” 52 U.S.C. §30101(17); 11 C.F.R. §100.16.¹

17. Under the FECA and FEC regulations, every person who is not a political committee must file a report with the FEC disclosing spending on independent expenditures if the person spends more than \$250 in a calendar year on them. 52 U.S.C. §30104(c)(1); 11C.F.R. §109.10. The term “person” includes an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons. 52 U.S.C. §30101(11).

18. The FECA and FEC regulations require every person who is not a political committee who makes independent expenditures totaling more than \$250 in a calendar year to file quarterly reports regarding the expenditures. 52 U.S.C. §30104(c)(1); 11 C.F.R. §109.10(b).

19. The FECA and FEC regulations also require a person who makes independent expenditures totaling \$10,000 or more on a given election in a calendar year up to the 20th day before the date of the election to file a report regarding the expenditures with the FEC within 48 hours. 52 U.S.C. §30104(g)(2)(A); 11 C.F.R. §109.10(c). The FECA and FEC regulations further require a person who makes independent expenditures totaling \$1,000 or more on a given election after the 20th day before the election, but more than 24 hours before the day of the election, to file a report describing the expenditures with the FEC within 24 hours. 52 U.S.C. §30104(g)(1)(A); 11 C.F.R. §109.10(d).

¹ FEC regulations define “expressly advocating” as “any communication that—(a) Uses phrases such as ‘vote for the President,’ ‘re-elect your Congressman,’ ‘support the Democratic nominee,’ [etc.] . . . or individual word(s), which in context can have no other reasonable meaning than to urge the election or defeat of one or more clearly identified candidate(s) . . . or (b) When taken as a whole and with limited reference to external events, such as proximity to the election, could only be interpreted by a reasonable person as containing advocacy of the election or defeat of one more clearly identified candidate(s) because—(1) The electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning; and(2) Reasonable minds could not differ as to whether it encourages actions to elect or defeat one or more clearly identified candidate(s) or encourages some other kind of action.” 11 C.F.R. § 100.22.

20. Each of these reports must disclose the recipient of the independent expenditure; the date, amount, and purpose of any such independent expenditure; whether such independent expenditure is in support of, or in opposition to, a candidate; the name and office sought by such candidate; and a certification that the expenditure was made without coordination with the candidate. 52 U.S.C. §30104(c)(2)(A) (incorporating reporting requirements of 52 U.S.C. §30104(b)(6)(B)(iii)); 11 C.F.R. §109.10(e).

21. Pursuant to one provision of the FECA, these reports must also identify each “person (other than a political committee) who makes a contribution to the reporting committee during the reporting period, whose contributions have an aggregate amount or value in excess of \$200 within the calendar year. . . together with the date and amount of any such contribution.” 52 U.S.C. § 30104(c)(1) (incorporating reporting requirements of 52 U.S.C. §30104(b)(3)(A)).

22. A separate provision of the FECA requires that these reports must disclose “the identification of each person who made a contribution in excess of \$200 to the person filing such statement which was made for the purpose of furthering *an* independent expenditure.” 52 U.S.C. §30104(c)(2)(C) (emphasis added).

23. Pursuant to FEC regulations, these reports must identify “each person who made a contribution in excess of \$200 to the person filing such report, which contribution was made for the purpose of furthering *the reported* independent expenditure.” 11 C.F.R. §109.10(e)(1)(vi) (emphasis added).

Enforcement

24. Under the FECA, any person who believes there has been a violation of the Act may file a sworn complaint with the FEC. 52 U.S.C. §30109(a)(1). Based on the complaint, the response from the person alleged to have violated the Act, and any recommendation of the Office of General Counsel (“OGC”), the FEC may then vote on whether there is “reason to believe” a violation of the FECA has occurred. 52 U.S.C. §30109(a)(2). A “reason to believe” exists where a complaint “credibly alleges” a violation of the FECA “may have occurred.” If the FEC finds there is “reason to believe” a violation of the FECA has occurred, the FEC must notify the respondents of that finding and “shall make an investigation of such alleged violation.” 52 U.S.C. § 30109(a)(2).

25. After the investigation, the OGC may recommend the FEC vote on whether there is “probable cause” to believe the FECA has been violated. 52 U.S.C. §30109(a)(3). The OGC must notify the respondents of any such recommendation and provide them with a brief stating the position of the OGC on the legal and factual issues presented, to which the respondents may reply. *Id.*

26. Upon consideration of these briefs, the FEC may then determine whether there is “probable cause” to believe a violation of the FECA has occurred. 52 U.S.C. §30109(a)(4)(A)(i). If the FEC finds probable cause to believe a violation of the FECA has occurred, the FEC must attempt for at least 30 days, but not more than 90 days, to resolve the matter “by informal methods of conference, conciliation and persuasion,” *id.*, a process that does not involve the complainant.

27. If the FEC is unable to settle the matter through informal methods, it may institute a civil action for legal and equitable relief in the appropriate United States district court. 52 U.S.C. §

30109(a)(6)(A). In any action instituted by the FEC, a district court may grant injunctive relief as well as impose monetary penalties. 52 U.S.C. §30109(a)(6)(B)–(C).

28. If at any stage of the proceedings the FEC dismisses a complaint, any “party aggrieved” may seek **judicial review** of that dismissal in the United States District Court for the District of Columbia. 52 U.S.C. §30109(a)(8)(A). All petitions from the dismissal of a complaint by the FEC must be filed “within 60 days after the date of the dismissal.” 52 U.S.C. §30109(a)(8)(B).

Judicial Review is a *ministerial act*. The statute compels the presiding judge to be duty mandatorily enjoined upon him by law. In other words, no judicial act is involved; rather the act required is merely ministerial. It involves only an absolute and rigid duty of the trial court to follow a fixed and prescribed course not involving the exercise of judgment or discretion. In *Commissioner of the General Land Office v. Smith*, 5 Tex. 471, 479 (1849) this court observed:

“The *distinction* between ministerial and judicial and other official acts seems to be that where the law prescribes and defines the duty to be performed with such precision and certainty as to *leave nothing* to the exercise of discretion or judgment, the act is ministerial; but where the act to be done involves the exercise of discretion or judgment in determining whether the duty exists, it is not to be deemed merely ministerial.”

The Court is reviewing agency action in this case, the Court “sits as an appellate tribunal, not as a court authorized to determine in a trial-type proceeding whether the Secretary's study was factually flawed.” *Marshall County Health Care Auth. v. Shalala*, 988 F.2d 1221, 1225 (8th Cir. 1993). The entire case on review is a question of law, and only a question of law.

29. The district court reviewing the FEC’s dismissal of a complaint may declare the FEC’s actions “contrary to law.” 52 U.S.C. § 30109(a)(8)(C). The court also may order the FEC “to conform with such declaration within 30 days.” *Id.* If the FEC fails to abide by the court’s order,

the FECA provides the complainant with a private right of action, brought in the complainants' own name, "to remedy the violation involved in the original complaint." *Id.*

FACTUAL BACKGROUND

On June 11, 2016, plaintiff made a variety of claims against Human Rights for Vietnam PAC (HRV PAC), Saigon Broadcasting Television Network (SBTN), former Congresswoman Loretta Sanchez (Sanchez), Mr. Diem Hoang Do is the Viet Tan Party Chairman, Mr. Dan Hoang its Spokesperson, Dung Trung Tran its Regional Chair for Southern California, and Dr. Viet Trong Nguyen a member of its Central Committee and Loretta Sanchez for Senate (both herein referred to as Sanchez Election Committee) and the Vietnam Reform Party ("Viet Tan") for violating the Federal Election Campaign Act of 1971, as amended (the "Act"). Specifically, (1) potential foreign national contributions to the Sanchez Committee, (2) potential corporate contributions from SBTN to the Sanchez Election Committee and HRV PAC, and (3) potential reporting omissions by HRV PAC. On March 7, 2017, FEC dismissed plaintiff's complaint.

Appendix 1

ARGUMENT AND AUTHORITIES

The FEC's dismissal on March 3, 2017 was blatantly wrong and manifestly unjust because it was based on unwarranted assumptions instead of thorough investigation. See Appendix 1. The fallacy of unwarranted assumptions is committed when the conclusion of an argument is based on a premise (implicit/explicit) that is false or unwarranted. It is a predisposition to decide a cause or an issue in a certain way, which does not leave the mind

perfectly open to conviction.² It is harmful and prejudicial to plaintiff because the FEC relies on the unwarranted assumptions to form its unmerited conclusion.

(1) **Potential foreign national contributions to the Sanchez Committee:** The FEC misconstrued the facts and, as a result, omits or misstates an issue or the facts. Specifically, on March 3, 2017, the FEC erroneously finds VIET TAN NORTH AMERICA CORP. and *Viet Tan - Vietnam Reform Party* (“Viet Tan”) are one and the same. The FEC’s reliance on VIET TAN NORTH AMERICA CORP. is misplaced and cannot stand because VIET TAN NORTH AMERICA CORP., which was/is not the disputed entity of the plaintiff’s FEC complaint. It is an entity **registered** in California with company number C2057717. It was incorporated on 6th October 1997, and contrary to FEC conclusion, it has never been based “in Vietnam”. See <https://businesssearch.sos.ca.gov/CBS/Detail> or see Appendix 2. It was not good comparison as Viet Tan - Vietnam Reform Party **never** registered its operations in the US and differs from the instant case on the form and substance of the requirements. It is like comparing apples and oranges. The distinction is critical. See Appendix 3.

The FEC concludes the plaintiff’s allegation of foreign contributions lacks “facts [to] support that allegation” and, thus “the Commission finds no reason to believe that Sanchez or the Sanchez Committee violated 52 U.S.C. § 3012 1 (a) as alleged.” See Appendix 1 - FEC’s Dismissal Letter. It further contends that:

“Viet Tan - Vietnam Reform Party (“VT”) represents itself as a pro-democracy organization that works to promote social justice and human rights within Vietnam through **non-violent** means. Viet Tan is based **in** Vietnam, but describes itself as having members and supporters in “most Vietnamese communities overseas.” FEC based its finding on **Viet Tan’s website**, quotes and its contention that “Viettan members **having** US addresses.”

² *Maddox v. State*, 32 Ga. 557, 79 Am. Dec. 307; *Pierson v. State*, 18 Tex. App. 55S; *Hinkle v. State*, 94 Ga. 595, 21 S. E. 601.

FEC's contention is erroneous for the following reasons:

A. The notion that Viet Tan/Vietnam Reform party is **based** in Vietnam lacks merit because on October 8, 2016, per Reuters and The Guardian:

“Vietnam has declared a U.S.-based activist group a terrorist organization and warned that any Vietnamese found to be involved with the group would be regarded as co-conspirators and punished.” “The government said the California-based Viet Tan, or Vietnam Reform Party, had recruited and trained operatives to use weapons and explosives.”³ (or See Appendix 4)

For the past 35 years Viet Tan has only operated clandestinely in Vietnam. Initially it operated an armed guerilla force under the name “United National Front for the Liberation of Vietnam” (aka The Front). Many of its members were caught while infiltrating Vietnam and sentenced to long-term imprisonment. It has reportedly executed half a dozen dissidents among its own force in the jungle of Thailand and has been under investigation for the murder of five Vietnamese American journalists on U.S. soil.

FEC fails to produce any evidence of Viet Tan's registration to operate in Vietnam in order to back up its finding and conclusion.

B. FEC's assertion that Viet Tan is “a pro-democracy organization that works to promote social justice and human rights within Vietnam through non-violent means” was based on FEC's reading Viet Tan's self-description posted on its website. Had FEC done its homework, it should have found that Viet Tan has a violent history. According to Professor Carlyle A. Thayer of School of Humanities and Social Sciences University College, the University of New South Wales at the Australian Defense Force Academy:

“Both Vietnamese authorities and members of the National United Front for the Liberation of Vietnam (NUFLV) agree that the NUFLV carried out acts of armed violence (or armed subversion) in Vietnam by infiltrating its members through Laos and Cambodia. A member of the *Vietnam Reform Party* has also indicated

³ <http://www.reuters.com/article/us-vietnam-security-idUSKCN1271HZ> and <https://www.theguardian.com/world/2016/oct/07/vietnam-viet-tan-terrorists-dissent>.

that during the period of clandestine activity (1982-1994), members of Viet Tan living in Vietnam carried arms. Vietnam charges that Viet Tan created an armed force in late 2002 and also hired criminals to assassinate government officials. <https://johnib.wordpress.com/2007/05/05/background-briefing-viet-tan/> (Or see screenshot below & Appendix 4)

According to Viet Tan's own website, it was founded on July 10, 1981. In 1982, its armed operations known as "The Front" was announced in 1982 in the jungles of Thailand by Hoang Co Minh, who was also the Founder and Chairman of Viet Tan. And despite Viet Tan's repeated attempts to whitewash its past terrorist activities, it simply cannot explain away as to why its leaders can be seen commandeering armed fighters and why its flag (white six-petal apricot⁴ flower on a blue background) was proudly displayed in a camp full of fighters carrying weapons. See clip between 2'05 and 3'10 minutes in the video <https://www.youtube.com/watch?v=6gKAleCnjo8> or See Appendix 4.

The Front is suspected and being investigated for the murder of five (5) Vietnamese American journalists. In fact, according to Committee to Protect Journalists (CPJ)'s 1994 report, key Viet Tan leaders were prime suspects behind the killings of many Vietnamese American journalists, including plaintiff's father, Nguyen Dam Phong: https://cpj.org/regions_07/americas_07/CPJ-SilencedReport.pdf. On Nov. 3, 2015, ProPublica and PBS/Frontline revisited these "cold cases" in their investigative documentary of The Front's acts of terrorism on American soil titled "Terror in Little Saigon".⁵ On June 1, 2016, CPJ and ProPublica jointly held a press conference at the National Press Club in Washington DC to call on the federal government to reopen its investigation into the murders of Vietnamese American journalists and other crimes reportedly committed by this criminal organization. See CPJ's press advisory at: <https://cpj.org/2016/06/cpj-calls-on-fbi-to-reinvestigate-murders-of->

⁴ <http://www.viettan.org/-English-.html>

⁵ <http://www.pbs.org/wgbh/frontline/film/terror-in-little-saigon/>; <https://www.propublica.org/article/terror-in-little-saigon-vietnam-american-journalist-murdered>

[vietn.php](#).

In “Terror in Little Saigon” former FBI investigators and former prosecutors have gone public about their findings:

"I do think that, particularly with Nguyen Dam Phong in Houston, and Le Triet and his wife, unfortunately, in Fairfax, Virginia — there is a distinct belief on my part that the National Front for the Liberation of Vietnam *was* responsible for *those* murders," said *Tang-Wilcox, the former FBI agent*. Of Dam Phong's murder, she said, "There were no other motives developed, other than the problems that he was having with the Front, because of the articles he was publishing. And then the way the murder was conducted. The casings were picked up and collected. That was someone who was highly trained, that knew what they were doing, and wasn't going to leave any evidence that would be remotely helpful behind. And the communiqué was left with him. It was an assassination." <https://www.propublica.org/article/terror-in-little-saigon-vietnam-american-journalists-murdered> (pages 15-19)

The Houston Police Department recently changed the status of its investigation into the murder of Nguyen Dam Phong from “cold case” to “active case.” Moreover, per Emeritus professor Carl Thayer, of the University of New South Wales, who has written extensively about anti-communist Vietnamese groups:

“There were two other violent acts involving the Vietnamese population in Canberra in the 1980s that could also be linked to the Front: shots fired at the Vietnamese embassy in O'Malley, and the bashing of Vietnamese students who were staying at the Canberra College of Advanced Education. You can't say there weren't elements in the Front that were responsible for violence". See <http://www.smh.com.au/national/the-day-vietnamese-anticommunist-violence-came-to-australia-20160104-glz1ok.html>.

Peace and Freedom

Policy and World Ideas

<https://johnib.wordpress.com/2007/05/05/background-briefing-viet-tan/>

« Business leaders find innovative ways to help refugees in Thailand
U.S., British officials drop 'war on terror' »

Background Briefing: Viet Tan

By Carlyle A. Thayer

Both the Vietnamese official media and Viet Tan are in agreement about the basic history of Viet Tan. Hoang Co Minh, a former Republic of Vietnam Navy Admiral, founded the National United Front for the Liberation of Vietnam (NUFLV) on April 30, 1980. He later founded the Vietnam Reform Party or Viet Tan (Viet Nam Canh Tan Cach Mang Dang) on September 10, 1982. The NUFLV and the Viet Tan aimed to overthrow the Vietnamese communist government.

Both Vietnamese authorities and members of the NUFLV agree that the NUFLV carried out acts of armed violence (or armed subversion) in Vietnam by infiltrating its members through Laos and Cambodia.

A member of the Vietnam Reform Party has also indicated that during the period of clandestine activity (1982-94), members of Viet Tan living in Vietnam carried arms. Vietnam charges that Viet Tan created an armed force in late 2002 and also hired criminals to assassinate government officials.

The Vietnam Reform Party went public on September 19, 2004 and at that time announced the dissolution of the NUFLV. The program of the Viet Tan and statements by its leaders stress that the Viet Tan will employ peaceful means to achieve democracy in Vietnam in cooperation with other like-minded groups.

C. Viet Tan is a foreign political party founded in 1982 in the jungle of Thailand and operates clandestinely in Vietnam for the entire duration of its existence. It is not incorporated or even registered to operate in the United States (or anywhere else in the world). Without IRS-issued employer identifications number (EIN), Viet Tan does not have a bank account and evidently has never filed tax return. To call its bluff, on August 09, 2016, I incorporated in California a corporation named Viet Tan and therefore forced the so-called Viet Tan to admit that it has no legal personality in the United States. See letter dated December 15, 2016 of my lawyer in Appendix 3. As such, Viet Tan operates through its individual members, who form a tight, mafia-like network.

The Act prohibits foreign nationals from making contributions in connection with Federal, state or local elections. (See 52 U.S.C. § 3012 J (a)). Foreign nationals include foreign *principals*⁶ (including foreign political parties) and individuals who are not citizens of the United States or a national of the United States who is not lawfully admitted for permanent residence. (See 52 U.S.C. § 3012 J (b)). As a consequence, it is particularly important that foreign affiliate *entities* do not directly or indirectly fund or subsidize a U.S. entity's corporate political activity.

Yet, Viet Tan, which is a foreign political party by FEC's own recognition, has many key members contributing regularly to Sanchez's election campaigns over the years. The Screenshot below shows Hoàng Tứ Duy (also known as Duy "Dan" Hoang), a Vietnamese-born American, to be currently the spokesperson for Viet Tan. https://en.wikipedia.org/wiki/Hoang_Tu_Duy

Vietnam Reform Party Việt Nam Canh Tân Cách Mạng Đảng	
Chairman	Đỗ Hoàng Điềm
Spokesperson	Hoang Tu Duy
Founder	Hoang Co Minh
Founded	July 10, 1981
Headquarters	United States
Newspaper	Vietnam Today
Ideology	Democracy Peaceful reform Social conservatism Anti-communism
Political position	Centre-right
National affiliation	Pittsburgh, Pennsylvania USA
Colors	Blue, White

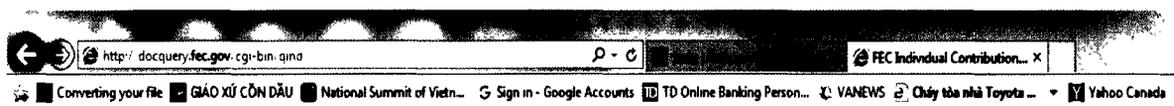
⁶(b) The term "foreign principal" includes—

- (1) a government of a foreign country and a *foreign political party*;
- (2) a person outside of the United States, unless it is established that such person is an individual and a citizen of and domiciled within the United States, or that such person is not an individual and is organized under or created by the laws of the United States or of any State or other place subject to the jurisdiction of the United States and has its principal place of business within the United States; and
- (3) a partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country.

Contributor Name	City	State	ZIP Code	Employer	Committee Name	Transaction Date	Amount	Image Number
DUY HOANG, DAN MR	WASHINGTON	DC	20037	VIET TAN PARTY	PHILLIPS, GEORGE K VIA PHILLIPS FOR CONGRESS	11/15/2007	250.00	28921159002
HOANG, DAN	SANTA CLARA	CA	95051		LOFGREN, ZOE VIA LOFGREN FOR CONGRESS	09/23/1998	200.00	98033732881
HOANG, DAN	WASHINGTON	DC	20037	INTERNATIONAL FINANCE CORP.	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	11/10/2003	200.00	24990222624
HOANG, DAN	WASHINGTON	DC	20037	International Finance Corp/Financ	SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ	09/11/2002	1000.00	22992242922
HOANG, DAN	WASHINGTON	DC	20037	WINDS CAPITOL	CAO, ANH JOSEPH VIA JOSEPH CAO FOR CONGRESS	08/03/2010	250.00	10931763767
HOANG, DAN D	WASHINGTON	DC	20037	INTERNATIONAL FINANCE CORP	SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ	09/30/2009	2400.00	29934897455
HOANG, DAN D	WASHINGTON	DC	20037	INTERNATIONAL FINANCE CORP/FINANC	SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ	06/29/2006	1000.00	26930428392
HOANG, DAN D	WASHINGTON	DC	20037	INTERNATIONAL FINANCE CORP/FINANC	SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ	09/28/2006	1000.00	27930175025
HOANG, DAN DUY	WASHINGTON	DC	20037	FOUR WINDS CAPITAL LLC	SMITH, CHRISTOPHER H VIA FRIENDS OF CHRIS SMITH	06/03/2008	1000.00	28991460118
HOANG, DAN MR	WASHINGTON	DC	20037	SILVERBERRY CAPITAL LLC	PHILLIPS, GEORGE K VIA PHILLIPS FOR CONGRESS	09/30/2010	250.00	10991808157
HOANG, DAN Q MR	WHIPPANY	NJ	07981	MICROWAVE CONCEPTS INC	REPUBLICAN NATIONAL COMMITTEE	07/29/2005	750.00	26920051413
Total Contributions:							8300.00	

Below are screen captures showing the contributions made by four Viet Tan party leaders: Diem Hoang Do (listed as Do, Diem; and Do, Diem H), Dan Hoang (listed as Duy Hoang Dan; Hoang Dan, D; and Hoang Dan, Duy), Dung Trung Tran (listed as Tran, Dung and Tran, Dung T), and Dr. Viet Trong Nguyen (listed as Nguyen, Viet; and Nguyen, Viet T residing in Yorba Linda, California). Mr. Diem Hoang Do is the Viet Tan Party Chairman, Mr. Dan Hoang its Spokesperson, Dung Trung Tran its Regional Chair for Southern California, and Dr. Viet Trong Nguyen a member of its Central Committee – he left Viet Tan a few years ago. A thorough investigation should reveal the contributions of lesser known Viet Tan members to

Loretta Sanchez's election campaigns. For a list of Viet Tan's current leadership list, see: <http://viettan.org/Leadership.html>. For years Viet Tan has sought to infiltrate the U.S. political system and manipulate the U.S. electoral process so as to protect its interests, expand its operations and silence its critics. Viet Tan high ranking executives have made financial contributions to Sanchez's election campaign starting in 2002, contrary to FEC's finding "Complaint lacks facts supporting that allegation".



Contributions to All Other Political Committees Except Joint Fundraising Committees

Contributor Name	City	State	ZIP Code	Employer	Committee Name	Transaction Date	Amount	Image Number
DO, DIEM	ANAHEIM	CA	92817	Kaiser Permanente/Administrator	SANCHEZ, LINDA VIA COMMITTEE TO ELECT LINDA SANCHEZ	08/06/2002	500.00	22992228555
DO, DIEM	ANAHEIM	CA	92817	Kaiser Permanente/Administrator	SANCHEZ, LINDA VIA COMMITTEE TO ELECT LINDA SANCHEZ	10/16/2002	500.00	22992376406
DO, DIEM	ANAHEIM	CA	92817	Kaiser Permanente/Administrator	SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ	08/15/2002	500.00	22992247899
DO, DIEM	ANAHEIM	CA	92817	Kaiser Permanente/Administrator	SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ	09/11/2002	500.00	22992247918
DO, DIEM H	ANAHEIM	CA	92807	AUREFLAM CORP/MANAGEMENT	SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ	09/28/2006	500.00	27930175032
DO, DIEM H	ANAHEIM	CA	92807	KAISER PERMENENTE	SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ	09/30/2009	1000.00	29934897450
DO, DIEM H	PLACENTIA	CA	92870	KAISER PERMANENTE	DORNAN, ROBERT KENNETH HON VIA DORNAN FOR CONGRESS	09/25/1998	250.00	98033694215
DO, DIEM H	PLACENTIA	CA	92870	KAISER PERMANENTE	ROYCE, ED MR. VIA ROYCE CAMPAIGN COMMITTEE	11/24/1997	500.00	98032750318
DO, DIEM H	PLACENTIA	CA	92870	KAISER PERMANENTE	ROYCE, ED MR. VIA ROYCE CAMPAIGN COMMITTEE	09/18/1998	800.00	98033724954
DO, DIEM H	PLACENTIA	CA	92870	KAISER PERMANENTE	ROYCE, ED MR. VIA ROYCE CAMPAIGN COMMITTEE	02/22/2000	200.00	20035480407
DO, DIEM H	PLACENTIA	CA	92870	KAISER PERMANENTE	ROYCE, ED MR. VIA ROYCE CAMPAIGN COMMITTEE	09/22/2000	400.00	20036200342
DO, DIEM H MR	ANAHEIM	CA	92807	KAISER PERMANENTE	ROYCE, ED MR. VIA ROYCE CAMPAIGN COMMITTEE	10/28/2003	250.00	24991186121
DO, DIEM H.	ANAHEIM	CA	92807	AUREFLAM CORP.	ROYCE, ED MR. VIA ROYCE CAMPAIGN COMMITTEE	02/19/2013	400.00	13963191508
DO, DIEM H. MR.	ANAHEIM	CA	92807	AUREFLAM CORP	ROYCE, ED MR. VIA ROYCE CAMPAIGN COMMITTEE	08/18/2006	1000.00	27930056356
DO, DIEM H. MR.	ANAHEIM	CA	92807	AUREFLAM CORP	ROYCE, ED MR. VIA ROYCE CAMPAIGN COMMITTEE	05/25/2008	1000.00	28991457656
DO, DIEM H. MR.	ANAHEIM	CA	92807	AUREFLAM CORP	ROYCE, ED MR. VIA ROYCE CAMPAIGN COMMITTEE	08/27/2010	1000.00	11930333352
DO, DIEM H. MR.	ANAHEIM	CA	92807	AUREFLAM CORP	ROYCE, ED MR. VIA ROYCE CAMPAIGN COMMITTEE	06/30/2011	1000.00	11931810618
Total Contributions:							10300.00	

TRY A: NEW QUERY RETURN TO: FEC HOME PAGE

Generated Mon Jan 11 19:00:39 2016




<http://docquery.fec.gov/cgi-bin/qind/>
FEC Individual Contribution... X

Converting your file **GIÁO XỨ CỒN DẦU** National Summit of Vietn... Sign in - Google Accounts TD Online Banking Person... VANEWS Cháy tòa nhà Toyota... Yahoo Canada



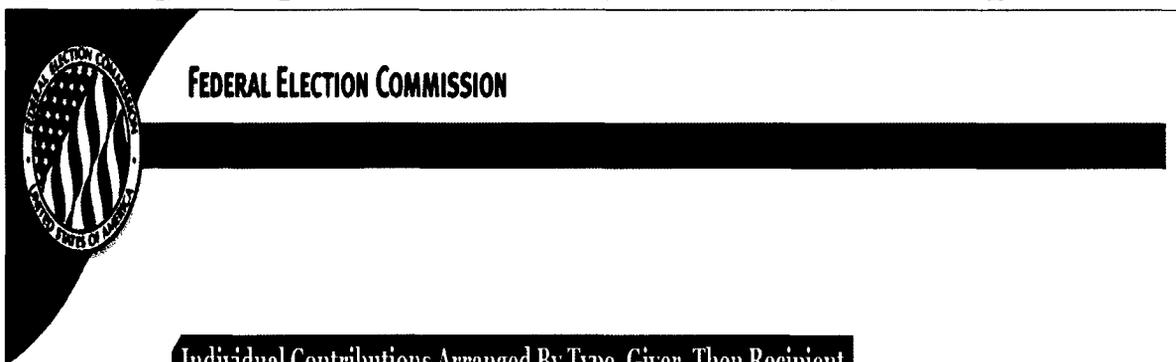
FEDERAL ELECTION COMMISSION

Individual Contributions Arranged By Type, Giver, Then Recipient

Contributions to All Other Political Committees Except Joint Fundraising Committees

Contributor Name	City	State	ZIP Code	Employer	Committee Name	Transaction Date	Amount	Image Number
TRAN, DUNG	DIAMOND BAR	CA	91765	BRISTLECONE INC	SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ	09/30/2009	1200.00	29934897466
TRAN, DUNG	DIAMOND BAR	CA	91765	BRISTLECONE INC/VICE-PRESIDENT	SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ	12/31/2001	500.00	22991798458
TRAN, DUNG	DIAMOND BAR	CA	91765	BRISTLECONE INC/VICE-PRESIDENT	SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ	09/28/2006	1000.00	27930175058
TRAN, DUNG	DIAMOND BAR	CA	91765	Bristlecone Inc/Vice-President	SANCHEZ, LINDA VIA COMMITTEE TO ELECT LINDA SANCHEZ	08/06/2002	600.00	22992228572
TRAN, DUNG	DIAMOND BAR	CA	91765	Bristlecone Inc/Vice-President	SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ	08/15/2002	600.00	22992247901
TRAN, DUNG	MARNE	MI	49435	DOGR	CARSON, BENJAMIN S SR MD VIA CARSON AMERICA	08/04/2015	250.00	201510159002980091
TRAN, DUNG	SAN JOSE	CA	95148	SILICON VALLEY MEDICAL DEVICE	TRAN, VAN VIA VAN TRAN FOR CONGRESS	09/30/2010	1000.00	11990234239
TRAN, DUNG	SAN JOSE	CA	95148	CREMA	KHANNA, ROHIT VIA RO FOR CONGRESS INC.	12/28/2013	500.00	14940206314
TRAN, DUNG	SAN JOSE	CA	95148	CREMA	KHANNA, ROHIT VIA RO FOR CONGRESS INC.	10/31/2014	1000.00	14952887412
TRAN, DUNG DDS	MORGAN HILL	CA	95037	SELF EMPLOYED	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	12/16/2005	500.00	26950024141
TRAN, DUNG MR.	HYATTSVILLE	MD	20783	ATLANTIC SUPERMARKET	NRCC	06/03/2003	500.00	24961219251
TRAN, DUNG MR.	MIDWAY CITY	CA	92655	TRANGROUP	NRCC	03/15/2006	500.00	26960443425
TRAN, DUNG T	DIAMOND BAR	CA	91765	BRISTLECONE INC	SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ	10/18/2000	1000.00	20036360382
TRAN, DUNG T	DIAMOND BAR	CA	91765	BRISTLECONE INC	SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ	10/18/2000	1000.00	20036360382

Browser navigation bar showing address: http://docquery.fec.gov/cgi-bin/qind/ and various search engines and services like Yahoo Canada.



Individual Contributions Arranged By Type, Giver, Then Recipient

Contributions to All Other Political Committees Except Joint Fundraising Committees

Contributor Name	City	State	ZIP Code	Employer	Committee Name	Transaction Date	Amount	Image Number
NGUYEN, BA VIET	HOUSTON	TX	77057	NBV ENTERPRISE	<u>ORTIZ, SOLOMON P VIA ORTIZ FOR CONGRESS COMMITTEE</u>	12/13/1999	1000.00	<u>20035182233</u>
NGUYEN, HUNG VIET	CORAL GABLES	FL	33134	WELBAUM HURNSEY	<u>GARCIA, JOE VIA JOE GARCIA FOR CONGRESS</u>	08/22/2008	200.00	<u>28994320673</u>
NGUYEN, VIET	NEW YORK	NY	10009	REGAL CINEMAS	<u>OBAMA, BARACK / JOSEPH R. BIDEN VIA OBAMA FOR AMERICA</u>	01/07/2008	250.00	<u>28932694473</u>
NGUYEN, VIET	YORBA LINDA	CA	92887	V NGUYEN MD/DOCTOR	<u>SANCHEZ, LORETTA VIA COMMITTEE TO RE-ELECT LORETTA SANCHEZ</u>	09/28/2006	500.00	<u>27930175046</u>
NGUYEN, VIET ANH	LAFAYETTE	LA	70506	SAIPEM AMERICA	<u>CLINTON, HILLARY RODHAM VIA HILLARY CLINTON FOR PRESIDENT</u>	02/10/2008	250.00	<u>28931458406</u>
NGUYEN, VIET BA	HOUSTON	TX	77057	NBV ENTERPRISE	<u>ORTIZ, SOLOMON P VIA ORTIZ FOR CONGRESS COMMITTEE</u>	10/31/2000	1000.00	<u>20036664483</u>
NGUYEN, VIET BA	HOUSTON	TX	77057	NBV ENTERPRISES INC	<u>GREEN, RAYMOND E. 'GENE' VIA GENE GREEN CONGRESSIONAL CAMPAIGN</u>	11/06/2000	1000.00	<u>20036690730</u>
NGUYEN, VIET H MR.	ORLANDO	FL	32836	RCS2000 INC	<u>NRCC</u>	04/06/2005	250.00	<u>26990195349</u>
NGUYEN, VIET T	YORBA LINDA	CA	92887	PHYSICIAN	<u>ROYCE, ED MR. VIA ROYCE CAMPAIGN COMMITTEE</u>	09/22/2000	400.00	<u>20036200341</u>
NGUYEN, VIET-NHAN DR.	BETHESDA	MD	20814	US ARMY	<u>MCCAIN, JOHN S. VIA JOHN MCCAIN 2008 INC.</u>	08/31/2008	200.00	<u>13941085888</u>
Total Contributions:							5050.00	

Joint Fundraising Contributions

These are contributions to committees who are raising funds to be distributed to other committees. The breakdown of these contributions to their final recipients may appear below

Contributor Name	City	State	ZIP Code	Employer	Committee Name	Transaction Date	Amount	Image Number
NGUYEN, VIET-HUONG	FOUNTAIN VALLEY	CA	92708	US DEPARTMENT OF VETERANS AFFAIRS	<u>OBAMA VICTORY FUND 2012</u>	02/07/2012	500.00	<u>12971269021</u>
Total Joint Fundraising:							500.00	



Furthermore, FEC record also shows that on September 23, 2013, the HRV PAC transferred \$250 to a Viet Tan member Dao Ba Ke, whose “nom de guerre” is Tran Quang Do.

In fact, The Washington Post reported that:

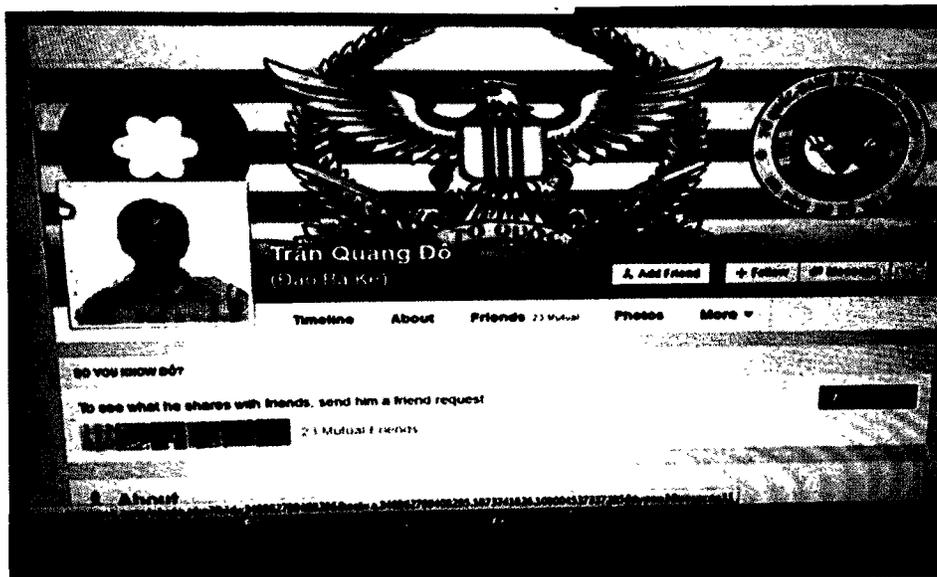
“Fifteen years after the end of the Vietnam war, a California-based group of Vietnamese exiles inspired by the collapse of communism in Eastern Europe is trying to ignite a guerrilla war in the southern part of this country and topple the Communist leadership here, Vietnamese officials say.

Thirty-eight suspected rebels went on trial yesterday in Hanoi's Supreme Court, focusing attention on the most recent of what the government has described as at least three abortive attempts in recent years by the exile group to infiltrate armed insurgents into Vietnam's central highlands.

In August 1989, 68 Vietnamese recruited by the so-called **National United Front** for the Liberation of Vietnam from refugee camps in Thailand crossed into neighboring Laos but soon ran into forces of the Hanoi-backed Laotian government, according to military and government officials here. Twenty-nine of the intruders were killed in a series of firefights spanning more than a month, 38 were captured and one escaped, the officials said. The **leader** of the August 1989 expedition has been identified here as **Dao Ba Ke**, 38, a former South Vietnamese paratroop lieutenant who uses the nom de guerre **Tran Quang Do**. He was sentenced to prison terms of 10 years to life.”

https://www.washingtonpost.com/archive/politics/1990/10/11/hanoi-tries-38-on-insurgency-charges/117a1e03-ef3b-4e2d-8949-6f237b83efed/?utm_term=.154fb028729e

Besides, there are many credible allegations that Dao Ba Ke was responsible for the execution of four/five dissenting members of The Front, in the jungles of Thailand between 1983 and 1987. Below is a screen capture showing his membership in Viet Tan.



Office Bought:	House Senate President	Disbursement For:	Primary General Other (specify) ▾	Category/Type	(MEMO ITEM) Sub-vendor Reimbursement of Omnex Group
State:	District:	Full Name (Last, First, Middle Initial)			Date of Disbursement
B. Ba Ke (Tran Quang) Dao (v)					09 / 23 / 2013
Mailing Address c/o Omnex Group 14546 Brookhurst St					Transaction ID: 8856.51000-000-00
City	Westminster	State	CA	Zip Code	92683
PURPOSE OF DISBURSEMENT to support H.R. activist Dao Ba Ke in Vietnam					Amount of Each Disbursement (in Dollars)
CATEGORIES NAME					012 Category/Type
Office Bought:	House Senate President	Disbursement For:	Primary General Other (specify) ▾	(MEMO ITEM) Sub-vendor Reimbursement of Omnex Group	
State:	District:	Full Name (Last, First, Middle Initial)			Date of Disbursement
C. Son Phu (Huynh C D) Hoang (v)					09 / 23 / 2013
Mailing Address c/o Omnex Group 14546 Brookhurst St					Transaction ID: 8856.51000-000-00
City	Westminster	State	CA	Zip Code	92683

As Dao Ba Ke and his “nom de guerre” Tran Quang Do are well known in the Vietnamese community, it is hard to believe that HRV PAC was not aware of who he was. HRV PAC has sent funds raised in the U.S. to only Dao Ba Ke but many other identifiable Viet Tan members. In other words, HRV PAC used funds raised in the U.S. to support Viet Tan’s clandestine operations in Vietnam.

The collusion between Viet Tan and Sanchez is more than the explanation of FEC in its response: hiring Lily Ngoc-Hieu Nguyen for her merits. She publicly presented herself as a voice and face of Viet Tan. For example, on August 8, 2011, she served as Viet Tan’s spokesperson at its Sixth International Vietnamese Youth Conference held in Manila, Philippines. She then went



on Radio Free Asia to falsely accuse Thai Van Dung of being an undercover agent sent by the Vietnamese government’s public security police to infiltrate the conference and spy on its participants. She disclosed his name, date of birth, hometown, and attendance at the Viet Tan-sponsored event in Manila. To the left is the screenshot of the RFA interview with Ms. Nguyen. Leading to

http://www.rfa.org/vietnamese/in_depth/v1

his arrest upon return to Vietnam and the subsequent arrests of many other of his fellow activists in Vietnam. All in all, fourteen (14) individuals were arrested. They were later sentenced to 86 years in prison followed by 34 years under administrative detention. Amnesty International reported this case in the following publication (pages 16-17): <https://www.amnesty.org/download/Documents/12000/asa410072013en.pdf>

Sanchez was fully aware of such use of her staff by Viet Tan but turned a deaf ear, apparently because she was receiving donations from Viet Tan members. I personally wrote to her and talked to her staff a dozen times about Viet Tan as a foreign political party trying to influence the U.S. political system via her office and particularly her Viet Tan-affiliated staff. From January to March, 2016, Viet Tan leaders called her office repeatedly to convince her to

stay silent over the evidence that I brought to her attention regarding Lily Ngoc-Hieu Nguyen's improper use her position with a federal elected office to advance the interests of a foreign political party. This fact was shared with me by Sanchez's staffs, Mr. Carlos Urquiza and Mark Pulido, in or about January 2016.

It is evident that Viet Tan, a foreign political party, used the contributions of its key members to keep Sanchez in Congress in exchange for her political support and coverage.

(2) ***Potential corporate contributions from Saigon Broadcasting to the Sanchez Committee***

Per FEC's denial letter:

"The Commission finds **no** reason to believe that Saigon Broadcasting violated 52 U.S.C. § 30118 by making corporate contributions, and no reason to believe that the Sanchez Committee violated 52 U.S.C. §§ 30118 or 30125 by accepting corporate contributions."

"With regard to the July 31 event, both the Sanchez Committee and Saigon Broadcasting state that Saigon Broadcasting was involved, but that the Committee paid Saigon Broadcasting for its involvement. The available information supports these representations. With its response, Saigon Broadcasting provided the Service Agreement entered into between it and the Committee, which shows that Saigon Broadcasting agreed to provide three hours of airtime for the fundraiser, along with six commercial spots per day, for one month, advertising the fundraiser.' Further, the Sanchez Committee's filings show a disbursement made **on August 18, 2015, to Saigon Broadcasting in the amount of \$4,500 for a "media buy."** The information in the record, therefore, does not provide information supporting the allegation that Saigon Broadcasting made in-kind contributions in connection with the July 31 event."

The law is very clear. A corporation may not use corporate funds to make contributions in connection with Federal elections.⁷ This means that corporate money cannot be used to write a check to a federal candidate's campaign committee or to a political party. As discussed below, this also means that a corporation cannot make an "*in-kind*" contribution to a candidate by using corporate resources to support that candidate's campaign.

⁷ 52 U.S.C. §30118(a). A "contribution" is defined as "(i) any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office; or (ii) the payment by any person of compensation for the personal services of another person which are rendered to a political committee without charge for any purpose." 52 U.S.C. § 30101(8); 11 C.F.R. §§ 100.51-100.56.

In other words, Saigon Broadcasting Television Network (“SBTN”) is prohibited from “facilitating” the making of contributions by *third* parties.⁸ Facilitation involves the use of corporate resources or facilities to engage in fundraising activities on behalf of a candidate or PAC (other than the corporation’s own PAC). Here, the Sanchez Committee held a fundraising on SBTN’s premises, and was open to employees who are not in the “restricted class.” SBTN provided the Sanchez Committee with impermissible corporate in-kind contributions by providing free airtime, employees (not alleged “volunteers”) and space to set up phone banks at SBTN. SBTN on many occasions offered its own contracted singers to perform at Sanchez’s fundraising events on SBTN stage. Despite, the FEC’s attempt to misconstrue the facts, in this case, SBTN’s “facilitation” not *only* involved the making of a prohibited in-kind contribution, but resulted in the **\$44,000.00** in contributions. The July 26, 2015 airing of Senate candidate Sanchez on SBTN, endorsing Sanchez for Senate and encouraging monetary donations to Sanchez’ campaign is undoubtedly violations of the Federal Election Campaign Act and Federal Election Commission Regulations. See 52 U.S.C. § 30118(a), 52 U.S.C. § 30125(e)(1)(A), 11 C.F.R. §§ 100.51-100.56 and 11 C.F.R. §300.61. The below screenshot proves there was NO “*media buy*”, but a prohibited in-kind contribution. It reads “*The total raised was \$44,000... We hope that you continue to mail in your check to support candidate Sanchez for her Senate Campaign.*” Note that SBTN’s CEO, Truc Ho, and its employees, publicly endorse Loretta Sanchez on air. The screenshot reported that singer Nguyen Khang, a member of SBTN and SBTN-affiliated ASIA Entertainment, performed the song “My Way” to encourage donations. This is yet another in-kind donation by SBTN. This is plainly a political contribution consisting of valuable air time and resources.

⁸ 11 C.F.R. § 114.2(f)(1).



Saigon Broadcasting Television Network

Like Page

added 3 new photos -- with Ty Tran

Jul. 26, 2015

Chương trình gây quỹ cho nữ Dân biểu Loretta Sanchez đã kết thúc với nhạc phẩm My Way. qua phần trình bày của ca sĩ Nguyễn Khang cũng như tiếng hát theo của nữ Dân biểu và các thiện nguyện viên

Tổng kết số tiền cuối cùng mà quý khán giả SBTN đã đóng góp cho nữ dân biểu Sanchez là 44.000 USD. Chúng tôi mong quý vị sẽ tiếp tục gửi check về để ủng hộ cho nữ dân biểu Sanchez trong kỳ tranh cử vào Thượng viện Hoa Kỳ sắp tới

Go Loretta Sanchez. we love you!



Below screenshots show SBTN hosted a live fundraising concert to support Loretta Sanchez's campaign for California Senate Race. Following is the tweet by Truc Ho, SBTN's CEO and President, in support of her campaign, and a picture of him with Loretta Sanchez during that concert and at the phone bank set up by SBTN to receive contributions for her campaign. This LIVE benefit concert was SBTN's corporate contribution to Sanchez's campaign.



sbtnofficial
SBTN

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sbtnofficial SBTN CEO, Truc Hò, converses with Congresswoman Loretta Sanchez during the midst of our LIVE benefit concert to support her campaign for California Senate Race 2016! #LorettaSanchez #TrucHo #SBTN



(3) *Potential reporting omissions by HRV PAC*

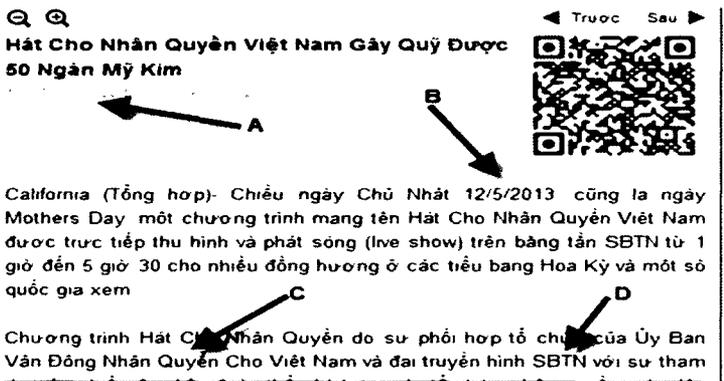
Per FEC's finding,

“There was no evidence in the supplemental filing provides evidence showing that contributions were not reported.” FEC further explains that, “HRV PAC's Response says that all contributions were properly reported and attaches an affidavit in support. The *affidavit* describes the *process* used to collect funds during the May 12 fundraiser, and says that because the fundraiser was a telethon, that some individuals who *pledged* to contribute during the telethon later *withdrew* their pledged contributions.”

The online edition of Viet Bao, a major Vietnamese-language newspaper, reported that Human Rights for Vietnam Political Action Committee (“HRV PAC”) *collected* large amounts of *cash* at a fundraising event on May 12, 2013. The cash in the amount of over \$51,000 in contributions to HRVN PAC was reported – it also reported that more contributions were still coming in. Yet, only \$2,200 was reported to FEC. The fact is, the unreported \$48,800 was *collected* cash and NOT *pledged*. One can withdraw an uncommitted pledge, but if cash was collected or donated, one must request for a refund, at which time paper trail would have been created (i.e., receipts, refund checks, account payable, costs associated with the refund, profit & loss and bank statements). HRV PAC's affidavit failed to either disclose said refunds or offer any evidence that refunds actually took place. The HRV PAC's affidavit contains a conclusory

assertion that 96% of the contributions it received were “later withdrew”; it does not set forth any facts on its face to establish by clear and convincing evidence how the unreported \$49,700 was later withdrawn. Legally speaking, the character of an affidavit is to be determined from its *substance* and not from its caption. Here the affidavit of HRV PAC alleges the unreported cash contributions in the amount of \$49,700 were later withdrawn. But HRV PAC provided no proof as to how, why or where on or off record of the alleged withdrawal that prevented HRV PAC from reporting the already collected cash (\$49,700) according to the online newspaper named Viet Bao, an independent source. HRV PAC provided no receipts that the collected cash was refunded to support its assertion or conclusory statements. Putting it differently, HRV PAC must plead those facts with enough specificity to raise a right to relief above the speculative level. HRV PAC's sworn uncorroborated evidence that is "so weak as to do no more than create a mere surmise or suspicion" of a fact is legally insufficient and constitutes no evidence to overcome the sworn corroborated affidavit relied upon by plaintiff.⁹ It appears beyond doubt that HRV PAC can prove no set of facts in support of its claims which would entitle HRV PAC to relief from FEC's investigation. In other words, HRV PAC's affidavit fails at the most basic step; it has no evidence, aside from conclusory statements or a mere assertion, of the alleged withdrawal.

⁹ See *Kindred v. Con Chemical, Inc.*, 650 S.W.2d 61, 63 (Tex. 1983); *Moron*, 133S.W.3d at 671. See *Griffin-Nolan v. Providence Washington Ins. Co.*, 2005 WL 1460424, 2005 U.S. Dist. LEXIS 12902 (N.D.N.Y.2005).



Kết thúc chương trình là bản Trêu Con Tim của Trúc Hồ được trình bày hợp ca với các ca sĩ trung tâm Asia và tiếng hát của tác giả

Trong lúc phát hình trực tiếp Hát Cho Nhân Quyền Việt Nam thì đường dây điện thoại 1-888-339-8247 được mở để nhận những sự đóng góp tài chánh của các đồng hương khắp nơi với sự làm việc của một nhóm khoảng 10 người. Vào cuối chương trình số tiền ủng hộ được công bố khoảng 47 ngàn nhưng mấy ngày sau thì tăng lên đến 51 ngàn và theo ban tổ chức cho biết còn tăng nữa vì trong lúc phát hình số người gọi quá nhiều làm đường dây bận rộn

Qui đồng hương muốn ủng hộ tài chánh chương trình Hát Cho Nhân Quyền Việt Nam xin gởi về địa chỉ Human Rights For Vietnam PAC 10501 Garden Grove Blvd, Garden Grove, CA 92803, điện thoại liên lạc (714) 636-1121



In the screenshot of Viet Bao article, (A), (C) & (D) show that VNHR PAC raised funds at events organized by SBTN. The screenshot to the left captures some such events.

(A) Note 18/05/2013 is actually May 18th, 2013

(B) Note 12/05/2013 is actually May 12th, 2013 – date of fundraising event

(E) & (F): According to the organizers (SBTN & HRV PAC), they were *overwhelmed* with callers/donors and were expecting to exceed the \$51,000 collected so far.

However, FEC record does not reflect the \$51,000 or more collected.

Instead, per FEC, *only* \$2,200 was reported for the May 12th, 2013 fundraising event. Why was \$48,800 not reported? This is assuming HRVN PAC stopped collecting at \$51,000.

<https://www.opensecrets.org/pac/s/pacgave2.php?cmte=C00517060&cycle=2014>. See Appendix 5.

Pursuant to one provision of the FECA, these reports must also identify each “person (other than a political committee) who makes a contribution to the reporting committee during the reporting period, whose contributions have an aggregate amount or value in excess of \$200 within the calendar year. . . together with the date and amount of any such contribution.” 52 U.S.C. § 30104(c)(1) (incorporating reporting requirements of 52 U.S.C. § 30104(b)(3)(A)).”

FEC’s dismissal is arbitrary, capricious, and contrary to law, in violation of 52 U.S.C. §30109(a)(8)(C) and 5 U.S.C. § 706(2) because it is inconsistent with a provision of the FECA, 52 U.S.C. § 30104(c), and notwithstanding for the following reasons: (1) the facts provided by plaintiff are "material" because they affect the outcome of the investigation, (2) plaintiff’s assertion corroborates with ‘evidence of supporting facts and circumstances’ by a preponderance of evidence, and (3) the corroborating circumstances derive from a source other than the plaintiff who challenges issues, but most importantly plaintiff provides facts to allow the FEC to draw “probable cause”¹⁰ or “reason to believe”¹¹ where a complaint “credibly alleges” a violation of the FECA “may have occurred.” Accordingly, as a matter of law and a matter of fact, FEC is required by law to investigate. The OGC gave no consideration to these facts, or to any other facts, before refusing to find reason to believe HRV PAC, SBTN, Viet Tan and Sanchez violated Section 30104(c)(1).

Plaintiff is therefore entitled to relief in the form of a declaratory order that defendant FEC is in violation of its statutory responsibilities under 52 U.S.C. §30109(a)(8) and 5 U.S.C. §

¹⁰ Probable cause is a requirement found in the Fourth Amendment. Courts usually find probable cause when there is a reasonable basis for believing that a crime may have been committed (for an arrest) or when evidence of the crime is present in the place to be searched (for a search). Probable cause is to be determined according to "the factual and practical considerations of everyday life on which reasonable and prudent men, not legal technicians, act. *Brinegar v. United States*, 338 U.S. 160, 175 (1949).

¹¹ standard “embodies the same standard of reasonableness inherent in probable cause.” *United States v. Gorman*, 314 F.3d 1111 (9th Cir. 2002).

706 and has acted arbitrarily or capriciously, abused its discretion, or acted contrary to law in dismissing MUR 7059.

REQUESTED RELIEF

WHEREFORE, Plaintiff respectfully request that this Court:

- Declare that the FEC's dismissal of MUR 7059 was arbitrary, capricious, an abuse of discretion, and contrary to law;
- Order the FEC to conform to such declaration within 30 days pursuant to 52 U.S.C. §30109(a)(8)(C);
- Award Plaintiff his costs, expenses, and reasonable attorneys' fees in this action; and
- Grant such other and further relief as the Court may deem just and proper.

Respectfully submitted,



Tu Nguyen
3310 N. Braeswood
Houston, Texas 77025
nguyentut@hotmail.com

EXHIBIT 1



FEDERAL ELECTION COMMISSION
Washington, DC 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tu Nguyen
3310 N. Braeswood
Houston, TX 77025

MAR -3 2017

RE: MUR 7059

Dear Mr. Nguyen:

The Federal Election Commission reviewed the allegations in your Complaint dated June 11, 2016, and found that on the basis of the information provided in your Complaint and information provided by the Respondents, Human Rights for Vietnam Political Action Committee, *et al.*, there is no reason to believe that the Respondents violated the Federal Election Campaign Act of 1971, as amended (the "Act"). Accordingly, on February 22, 2017, the Commission closed the file in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). The Factual and Legal Analysis, which more fully explains the Commission's finding, is enclosed.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 52 U.S.C. § 30109(a)(8).

Sincerely,

Lisa J. Stevenson
Acting General Counsel

A handwritten signature in black ink, appearing to read "Lynn Y. Tran", with the words "w/permission" written in a smaller, cursive script to the right of the signature.

By: Lynn Y. Tran
Assistant General Counsel

Enclosure:
Factual and Legal Analysis

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

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RESPONDENTS: Human Rights for Vietnam PAC and Don Le in his
official capacity as treasurer
Saigon Broadcasting Television Network
Viet Tan North America Corp.
Loretta Sanchez
Loretta Sanchez for Senate and Ashleigh Aitken in
her official capacity as treasurer

11 **I. INTRODUCTION**

12
13 The Complaint makes a variety of claims against Human Rights for Vietnam PAC and
14 Don Le in his official capacity as treasurer, Saigon Broadcasting Television Network, former
15 Congresswoman Loretta Sanchez, and Loretta Sanchez for Senate and Ashleigh Aitken in her
16 official capacity as treasurer (collectively, “Respondents”), stemming from their alleged dealings
17 with the Vietnam Reform Party (“Viet Tan”). Because the Complaint does not set forth a
18 sufficient factual basis for believing that the Respondents violated any provision of the Federal
19 Election Campaign Act of 1971, as amended (the “Act”), the Commission finds no reason to
20 believe that the Respondents violated the Act as alleged.

1 **II. FACTUAL AND LEGAL ANALYSIS**

2 Human Rights for Vietnam PAC (“HRV PAC”) is a multi-candidate political action
3 committee that registered with the Commission on March 3, 2012.¹ Viet Tan represents itself as
a pro-democracy organization that works to promote social justice and human rights within

Factual and Legal Analysis for MUR 7059
Human Rights for Vietnam PAC, *et al.*
Page 2 of 8

1 Vietnam through non-violent means.² Viet Tan is based in Vietnam, but describes itself as
2 having members and supporters in “most Vietnamese communities overseas.”³

3 At the time of the events at issue in the Complaint, Loretta Sanchez was a United States
4 Congresswoman for the state of California and a 2016 candidate for United States Senate in
5 California. Loretta Sanchez for Senate was the principal campaign committee for her 2016
6 Senate run.⁴ Saigon Broadcasting Television Network, Inc. (“Saigon Broadcasting”) is a 24-
7 hour Vietnamese language channel that describes itself as “programmed to meet the needs of
8 Vietnamese audiences living outside Vietnam.”⁵ Saigon Broadcasting is registered as a
9 corporation in the State of California and is headquartered in Garden Grove, California.⁶

10 The Complaint makes allegations against these Respondents that appear to raise three
11 types of issues that implicate the Act: (1) potential corporate contributions from Saigon
12 Broadcasting to the Sanchez Committee and HRV PAC, (2) potential foreign national
13 contributions to the Sanchez Committee, and (3) potential reporting omissions by HRV PAC.
14 The Commission discusses each of these issues in turn below.

15 **A. Alleged Corporate Contributions by Saigon Broadcasting**

16 The Act and Commission regulations prohibit any corporation from making a
17 contribution in connection with a Federal election, and prohibit any candidate or political

² Viet Tan – Vietnam Reform Party, *Why Viet Tan* (English translation), <http://www.viettan.org/Why-Viet-Tan.html> (last visited Jan. 6, 2017).

³ *See id.*, *Who We Are*, <http://www.viettan.org/Who-We-Are.html> (last visited Jan. 6, 2017).

⁴ *See* Amended Statement of Organization, Loretta Sanchez for Senate (June 18, 2015). Representative Sanchez and Loretta Sanchez for Senate will be referred to collectively as the “Sanchez Committee.” Representative Sanchez ultimately lost her campaign for the Senate.

⁵ Saigon Entertainment Television, LLC, About the SBTN Network, <http://set574.com/sbtn-saigon-broadcasting-television-network/> (last visited Jan. 13, 2017).

⁶ *See id.*; California Secretary of State Business Entity Search, <https://businesssearch.sos.ca.gov/> (last visited Jan. 6, 2017).

Factual and Legal Analysis for MUR 7059
Human Rights for Vietnam PAC, *et al.*
Page 3 of 8

1 committee from knowingly accepting or receiving such a contribution, including all in-kind
2 contributions.⁷ Further, Federal candidates may not solicit, receive, direct, transfer, or spend
3 money in connection with an election for Federal office unless the funds are subject to the
4 limitations, prohibitions, and reporting requirements of the Act.⁸

5 1. Contributions to Sanchez Committee

6 The Complaint alleges that Saigon Broadcasting provided the Sanchez Committee with
7 impermissible corporate in-kind contributions by providing free airtime, organizing phone banks,
8 and hosting fundraising events for her election campaigns.⁹ The Complaint specifically
9 identifies two fundraising events that were allegedly hosted by Saigon Broadcasting on July 31,
10 2015, and February 27, 2016, to support the Sanchez Committee.¹⁰ In support of the allegation,
11 the Complaint includes only a copy of a poster advertising the February 27 event, and a tweet
12 sent out by Saigon Broadcasting's CEO and President purportedly about the July 31 event. The
13 tweet includes a picture of the CEO and Sanchez "during the midst of our LIVE benefit concert
14 to support her campaign for California Senate Race 2016."¹¹

15 The Sanchez Committee asserts that a group of volunteers hosted and ran the February 27
16 event and that the Complaint presents no specific factual information to show that Saigon

⁷ 52 U.S.C. § 30118(a); *see also* 52 U.S.C. § 30101(8)(A)(i).

⁸ 52 U.S.C. § 30125(e)(1)(A); *see also* 11 C.F.R. § 300.61. The Act provides that a contribution includes "any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office." 52 U.S.C. § 30101(8)(A). The term "person" for purposes of the Act and Commission regulations includes partnerships, corporations, and "any other organization or group of persons." *Id.* § 30101(11); 11 C.F.R. § 100.10.

⁹ *Compl.* at 5. The Complaint states that Saigon Broadcasting has supported Sanchez because of their mutual desire to advance Viet Tan's cause. *Id.* at 15.

¹⁰ *Id.* at 5-6

Factual and Legal Analysis for MUR 7059
Human Rights for Vietnam PAC, *et al.*
Page 4 of 8

1 Broadcasting was involved.¹² Further, nothing in the poster included in the Complaint, which
2 purports to show Saigon Broadcasting's involvement in the event, appears to connect Saigon
3 Broadcasting to the event.¹³ In light of the Complaint's failure to present any information or
4 specific facts suggesting that Saigon Broadcasting participated in the February 27, 2016
5 fundraiser, we have no reason to conclude that Saigon Broadcasting made in-kind contributions
6 in connection with the event.

7 With regard to the July 31 event, both the Sanchez Committee and Saigon Broadcasting
8 state that Saigon Broadcasting was involved, but that the Committee paid Saigon Broadcasting
9 for its involvement.¹⁴ The available information supports these representations. With its
10 response, Saigon Broadcasting provided the Service Agreement entered into between it and the
11 Committee, which shows that Saigon Broadcasting agreed to provide three hours of airtime for
12 the fundraiser, along with six commercial spots per day, for one month, advertising the
13 fundraiser.¹⁵ Further, the Sanchez Committee's filings show a disbursement made on August 18,
14 2015, to Saigon Broadcasting in the amount of \$4,500 for a "media buy."¹⁶ The information in
15 the record, therefore, does not provide information supporting the allegation that Saigon
16 Broadcasting made in-kind contributions in connection with the July 31 event.

17 Based on the foregoing, the Commission finds no reason to believe that Saigon
18 Broadcasting violated 52 U.S.C. § 30118 by making corporate contributions, and no reason to

¹² *Resp. of Sanchez Committee at 2 (Sept. 9, 2016).*

¹³ *Compl. at 6.*

¹⁴ *Resp. of Sanchez Committee at 2; Resp. of Saigon Broadcasting at 1-2 (Aug. 11, 2016).*

¹⁵ *Resp. of Saigon Broadcasting, Ex. 1.*

¹⁶ *2015 October Quarterly Report at 167, Loretta Sanchez for Senate (Oct. 15, 2015).*

Factual and Legal Analysis for MUR 7059
Human Rights for Vietnam PAC, *et al.*
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1 believe that the Sanchez Committee violated 52 U.S.C. §§ 30118 or 30125 by accepting
2 corporate contributions.

3 2. Contributions to HRV PAC

4 The Complaint further asserts that HRV PAC was established and funded by Saigon
5 Broadcasting.¹⁷ Though it does not allege any specific violation of the Act in connection with
6 this factual assertion, if Saigon Broadcasting established and funded HRV PAC, such activity
7 may result in Saigon Broadcasting making corporate contributions to HRV PAC in violation of
8 52 U.S.C. § 30118.¹⁸ The Complaint primarily attempts to support its allegation by asserting that
9 two Saigon Broadcasting employees hold administrative positions with HRV PAC.¹⁹ This fact,
10 by itself, does not support a conclusion that Saigon Broadcasting has made prohibited corporate
11 contributions because no information suggests that the employees' HRV PAC positions are
12 connected to their employment at Saigon Broadcasting.²⁰ Neither the Complaint nor the
13 information presented provides any additional basis to believe that Saigon Broadcasting
14 improperly administered or was affiliated with HRV PAC in violation of the Act. The
15 Commission therefore finds no reason to believe that Saigon Broadcasting violated 52 U.S.C.
16 § 30118 by making corporate contributions to HRV PAC.

17

¹⁷ Compl. at 13-15.

¹⁸ See 52 U.S.C. § 30101(7); 11 C.F.R. § 114.5(b).

¹⁹ Compl. at 13.

²⁰ See generally 52 U.S.C. § 30118(a). The Act prohibits corporations from making contributions to any federal candidate or political committee. *Id.* The Act provides that a contribution includes "any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office." *Id.* § 30101(8)(A). The term "person" for purposes of the Act and Commission regulations includes partnerships, corporations, and "any other organization or group of persons." *Id.* § 30101(11) 11 C.F.R. § 100.10.

Factual and Legal Analysis for MUR 7059
Human Rights for Vietnam PAC, *et al.*
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1 **B. Alleged Foreign National Contributions to Sanchez Committee**

2 The Act prohibits foreign nationals from making contributions in connection with
3 Federal, state or local elections.²¹ Foreign nationals include foreign principals (including foreign
4 political parties) and individuals who are not citizens of the United States or a national of the
5 United States who is not lawfully admitted for permanent residence.²²

6 The Complaint alleges that the Sanchez Committee received contributions from Viet Tan
7 members because of Sanchez's ties to the group.²³ The Complaint further alleges that Sanchez
8 hired Viet Tan member Lilly Nguyen as a member of her staff in exchange for the contributions
9 from Viet Tan members.²⁴ The Sanchez Committee denies receiving illegal contributions and
10 states that Nguyen was hired based on her qualifications.²⁵

11 To the extent that the Complaint can be construed to allege that any of the Respondents
12 violated the Act's ban on foreign national contributions, the Complaint lacks facts supporting
13 that allegation.²⁶ The Complaint does not present information indicating that any of the alleged

²¹ 52 U.S.C. § 30121(a).

²² 52 U.S.C. § 30121(b).

²³ Compl. at 6.

²⁴ *Id.* at 11.

²⁵ Resp. of Sanchez Committee at 3.

²⁶ The Complaint repeatedly alleges that HRV PAC made improper donations to Vietnamese nationals, specifically asserting that HRV PAC illegally transferred \$34,000 to entities in Vietnam, including around 120 "Viet Tan members and sympathizers." See Compl. at 3-5. HRV PAC concedes that it sends donations to human rights activists in Vietnam based on the financial need of those activists and asserts that such activity is legal. Resp. of HRV PAC at 1-2, Ex. 1 (Aug. 11, 2016). HRV PAC also says that it does not consider whether a potential recipient is a member of Viet Tan when making donations. *Id.* So, while the available information supports the assertion that HRV PAC has donated to Vietnamese nationals, those donations do not appear to violate any provision of the Act. See Advisory Op. 2015-06 (*Waters*) (concluding that a leadership PAC, authorized campaign committee, and federal candidate in her personal capacity could all contribute to a foreign candidate); Advisory Op. 2015-02 (*Grand Trunk Western Railroad -- Illinois Central Railroad PAC*) at 3 n.2 (noting that foreign entity's "receiving of donations does not implicate the Act's prohibition on foreign nationals making any contribution or donation in connection with an election" (emphasis in original)). Further, any allegations regarding liability stemming from HRV PAC's funding of criminal activity, are outside the jurisdiction of this agency. As such, we make no recommendations regarding allegations relating to HRV PAC's disbursements to Vietnamese nationals.

Factual and Legal Analysis for MUR 7059
Human Rights for Vietnam PAC, *et al.*
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1 Viet Tan members who have contributed to the Sanchez Committee are foreign nationals.²⁷
2 Further, the Committee's disclosure reports show that all of the contributors mentioned in the
3 Complaint have U.S. addresses.²⁸ With respect to the hiring of Nguyen, the Sanchez Committee
4 states that she was well-qualified when she was hired by Sanchez and that she was not hired in
5 exchange for contributions.²⁹ Given the absence of any specific facts demonstrating possible
6 violations of the Act, the Commission finds no reason to believe that Sanchez or the Sanchez
7 Committee violated 52 U.S.C. § 30121(a) as alleged.

8 **C. Alleged Reporting Omissions by HRV PAC**

9 As a multi-candidate political action committee, HRV PAC is required to file reports of
10 receipts and disbursements in accordance with 52 U.S.C. § 30104(a)(4) and (b).

11 The Complaint alleges that HRV PAC failed to include certain contributions from
12 individuals in its disclosure reports and falsely claimed to transfer money to entities in Vietnam,
13 despite not actually transferring that money.³⁰ In support, the Complainant attached a sworn
14 affidavit (with an accompanying exhibit) attesting that he issued a public announcement asking
15 for HRV PAC contributors to contact him.³¹ As a result of this request, the Complainant asserts
16 that he learned of more than 180 individuals "who made cash donations and were not asked to
17 fill out forms"³² The affidavit calculates these contributions as being worth \$21,654.³³ The

²⁷ See Compl. at 6-10.

²⁸ See *id.* at 7-9.

²⁹ Resp. of Sanchez Committee at 3.

³⁰ See Compl. at 15; Supp. Compl. (July 18, 2016).

³¹ Compl., App. 6.

³² *Id.*

³³ *Id.*

Factual and Legal Analysis for MUR 7059
Human Rights for Vietnam PAC, *et al.*
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1 accompanying exhibit purports to identify these unreported contributions, but the information in
2 the exhibit is mostly incomprehensible.³⁴

3 The Complainant also submitted a supplemental submission alleging that HRV PAC
4 accepted large amounts of unreported cash at a fundraising event on May 12, 2013, and suggests
5 that the money was improperly transferred to Viet Tan.³⁵ HRV PAC's Response says that all
6 contributions were properly reported and attaches an affidavit in support.³⁶ The affidavit
7 describes the process used to collect funds during the May 12 fundraiser, and says that because
8 the fundraiser was a telethon, that some individuals who pledged to contribute during the
9 telethon later withdrew their pledged contributions.³⁷

10 Notwithstanding the Complaint's allegations, neither the exhibit that was filed to support
11 the appendix nor the supplemental filing provides evidence showing that contributions were not
12 reported. Instead, a sample review of the contributors identified in both Appendix 6 and the
13 supplemental submission confirms that those contributions were reported to the Commission as
14 required under the Act. Without any factual support for the allegations, the Commission finds no
15 reason to believe that the Sanchez Committee violated 52 U.S.C. § 30104 by failing to report
16 receipts and disbursement as alleged.

³⁴ *See id.*, Ex. B. For example, Exhibit B contains entries such as "A_CANTHO \$60," "con ac mong 7_4 \$120," and "Gauden-003 \$50." *Id.* It is not clear how the description that accompanies each contribution is supposed to identify the source of that contribution. The exhibit also does not show when each contribution was made.

³⁵ *Supp. Compl.* at 1.

³⁶ *Resp. of HRV PAC* at 2-3, Ex. 2.

³⁷ *Id.*

EXHIBIT 2

 <p>State of California Secretary of State</p> <p>Statement of Information (Domestic Stock and Agricultural Cooperative Corporations) FEES (Filing and Disclosure): \$25.00. If this is an amendment, see instructions.</p> <p>IMPORTANT – READ INSTRUCTIONS BEFORE COMPLETING THIS FORM</p>	S
<p>1. CORPORATE NAME VIET TAN NORTH AMERICA CORP.</p>	
<p>2. CALIFORNIA CORPORATE NUMBER C2057717</p>	

FF91704
FILED

In the office of the Secretary of State
of the State of California

SEP-15 2016

This Space for Filing Use Only

<p>No Change Statement (Not applicable if agent address of record is a P.O. Box address. See instructions.)</p> <p>3. If there have been any changes to the information contained in the last Statement of Information filed with the California Secretary of State, or no statement of information has been previously filed, this form must be completed in its entirety.</p> <p><input checked="" type="checkbox"/> If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to Item 17.</p>				
<p>Complete Addresses for the Following (Do not abbreviate the name of the city. Items 4 and 5 cannot be P.O. Boxes.)</p>				
4	STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE	CITY	STATE	ZIP CODE
5	STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY	CITY	STATE	ZIP CODE
6	MAILING ADDRESS OF CORPORATION IF DIFFERENT THAN ITEM 4	CITY	STATE	ZIP CODE
<p>Names and Complete Addresses of the Following Officers (The corporation must list these three officers. A comparable title for the specific officer may be added, however, the preprinted titles on this form must not be altered.)</p>				
7	CHIEF EXECUTIVE OFFICER:	ADDRESS	CITY	STATE ZIP CODE
8	SECRETARY	ADDRESS	CITY	STATE ZIP CODE
9	CHIEF FINANCIAL OFFICER:	ADDRESS	CITY	STATE ZIP CODE
<p>Names and Complete Addresses of All Directors, Including Directors Who are Also Officers (The corporation must have at least one director. Attach additional pages, if necessary.)</p>				
10	NAME	ADDRESS	CITY	STATE ZIP CODE
11	NAME	ADDRESS	CITY	STATE ZIP CODE
12	NAME	ADDRESS	CITY	STATE ZIP CODE
<p>13. NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS IF ANY:</p>				
<p>Agent for Service of Process if the agent is an individual, the agent must reside in California and Item 15 must be completed with a California street address, a P.O. Box address is not acceptable. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 15 must be left blank.</p>				
<p>14. NAME OF AGENT FOR SERVICE OF PROCESS</p>				
15	STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL		CITY	STATE ZIP CODE
<p>Type of Business</p>				
<p>16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION</p>				
<p>17. BY SUBMITTING THIS STATEMENT OF INFORMATION TO THE CALIFORNIA SECRETARY OF STATE, THE CORPORATION CERTIFIES THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.</p>				
09/15/2016	LOAN BUI	BOOKKEEPER		
DATE	TYPE/PRINT NAME OF PERSON COMPLETING FORM	TITLE	SIGNATURE	
81-200 (REV 01/2013)				APPROVED BY SECRETARY OF STATE

EXHIBIT 3

Drucker | Hopkins LLP

Will Denham
Of Counsel

The Woodlands Office
8505 Technology Forest Place, Suite 901
The Woodlands, Texas 77381
281.210.0041 (P)
855.558.1745 (F)

Downtown Office
1401 Richmond Avenue, Suite 250
Houston, Texas 77006
713.352.8888 (P)
713.454.7773 (F)

Thursday, December 15, 2016

Mr. Frank M. Radoslovich
Radoslovich, Parker, Turner, P.C.
701 University Ave., Ste. 100
Sacramento, CA 95825
Via Email: frank@rptlaw.com

Re: Viet Tan – Vietnam Reform Party

Dear Mr. Radoslovich,

As you know, last month we asked you to provide us documents to support your claims that your office represents the true “Viet Tan” (or “viettan” or Viet Nam Reform Party (Vietnamese translation- Việt Nam Canh Tân Cách Mạng Đảng)) and that this organization “is a prominent civic organization” that has operated publicly “in the United States, Canada, Australia, France, Germany, Japan, Holland, Norway and several other countries.”

But in your response dated November 28, 2016, you provided us no documents showing that this organization has ever had an EIN number or filed anything with the IRS, no documents suggesting that this organization has ever had any standing to operate anywhere (including anywhere in the U.S.), and no documents reflecting who plays any role in this organization. In fact, you provided us no documents *whatsoever*.

Instead, you say that publicly-available documents are equally available to us, but I explained that we could find no documents anywhere to support your claims or to support the legal existence of your client. Therefore, I would ask again that you please send me any such documents, or send me any identifying information (registration numbers, a link, etc.) that would allow us to find or to see any of the publicly-available documents.

You also appear to claim that your client is not an “organization” because it operates as an “unincorporated association.” But if it is not an organization, then your client has no legal personality outside of its membership. *See Burton v. Grand Rapids School Furniture Co.*, 10 Tex.Civ.App. 270, 31 S.W. 91, 92 (1895, no writ) (“An unincorporated association is no person, and has not the power to sue or to be sued.”). In that case, the only proof that your client even exists is through the list of individuals making up the membership of that unincorporated association. Yet you declined my request for the list of such members of the “true” Viet Tan. Again, please provide that information.

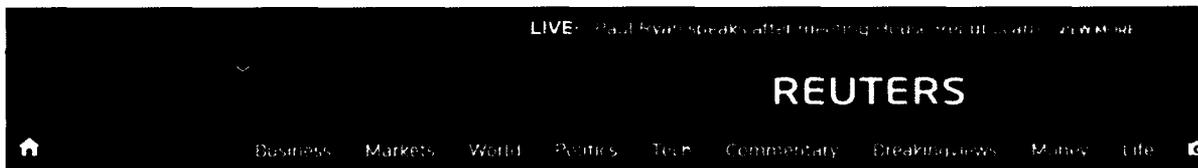
Finally, you say that the IRS code sections 501(c)(3) and 501(c)(4) are “inapplicable” to your client, but provide no statutory or legal support for that statement. My understanding is that even unincorporated associations have to pay taxes on income—or satisfy section 501. *See, e.g., NCAA v. Commissioner*, 92 TC 456, 457, 461 (Tax Court 1989) (observing that NCAA is unincorporated association that is a 501(c)(3) organization exempt from most taxes). Therefore, I would ask that you please send me the authority you’re relying upon to suggest that this organization or association need not comply with the IRS provisions.

We would prefer to address these issues now, without the burden and expense of litigation and discovery. I hope that we can resolve this dispute amicably.

If you have any questions, please let me know. We look forward to your response.

Sincerely,
/s/ Will Denham
Will Denham

EXHIBIT4



WORLD NEWS

Vietnam declares California-based group terrorist

<http://www.reuters.com/article/us-vietnam-security-idUSKCN1271HZ>

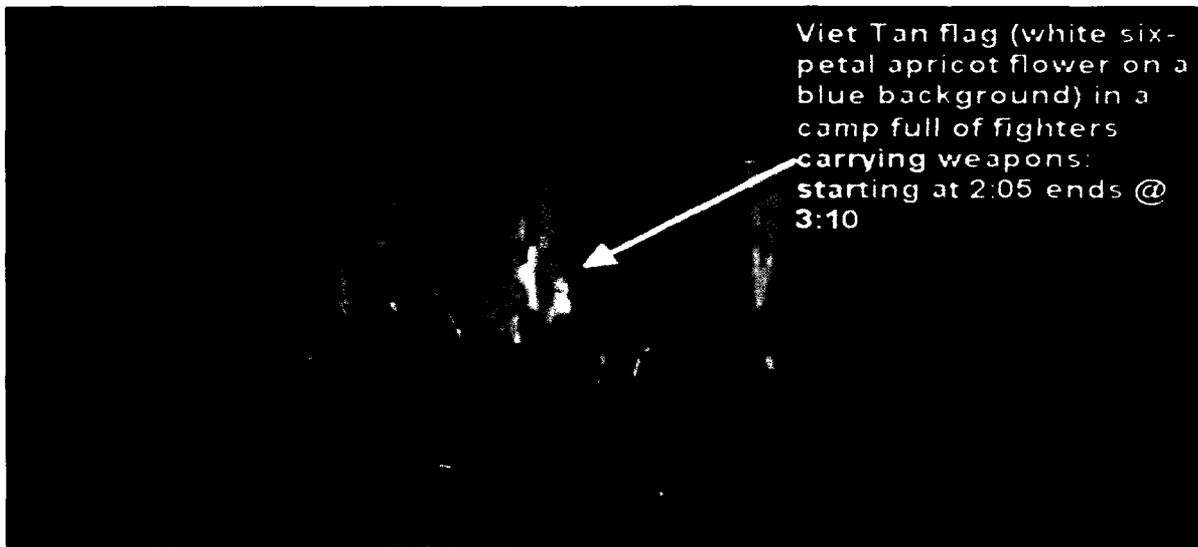


Vietnam has declared a U.S.-based activist group a terrorist organization and warned that any Vietnamese found to be involved with the group would be regarded as co-conspirators and punished.

The government said the California-based Viet Tan, or Vietnam Reform Party, had recruited and trained operatives to use weapons and explosives.

Vietnam has long been sensitive to the activities of Viet Tan, calling the group "reactionaries" but the announcement carried on state television was the first time it had designated it a terrorist organization.

Vietnam's police-run Ministry of Public Security said Viet Tan had trained members in militant activities, kidnaps and murders and arranged for operatives to sneak in to Vietnam to organize protests and instigate violence.



Viet Tan flag (white six-petal apricot flower on a blue background) in a camp full of fighters carrying weapons: starting at 2:05 ends @ 3:10

Viet Tan's leaders can be seen commandeering the fighters and its flag (white six-petal apricot flower on a blue background) was proudly displayed in a camp full of fighters carrying weapons between 2'05 and 3'10 minutes in the video. <https://www.youtube.com/watch?v=6gKAleCnjo8>

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Vietnam

Vietnam declares US-based activist group is a terrorist organization

The Viet Tan is accused of training operatives and the government says the California-based organization instigates violence

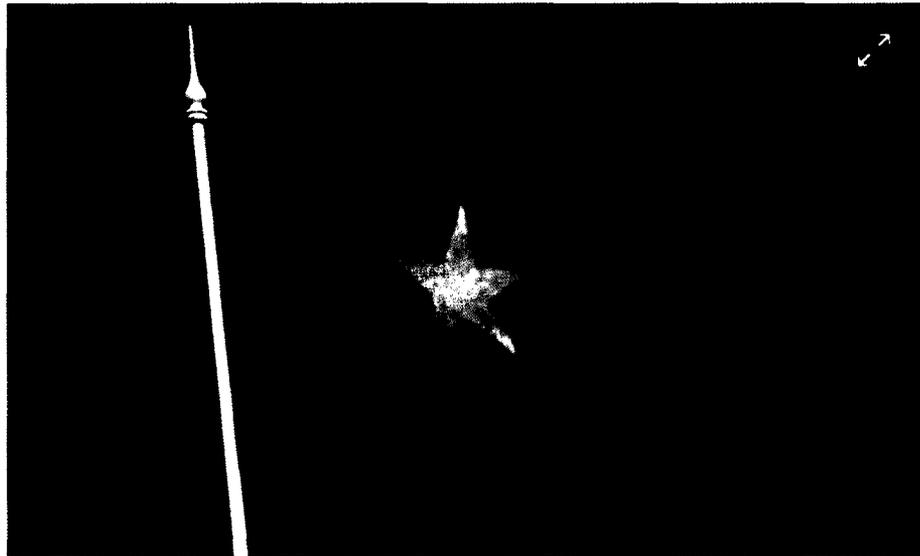


This article is 6 months old

77

Reuters in Hanoi

Friday 7 October 2016
11:39 EDT



The police-run Ministry of Public Security said Viet Tan had trained members in militant activities, kidnaps and murders and arranged for operatives to sneak in to Vietnam. Photograph: Alamy Stock Photo

Vietnam has declared a US-based activist group a terrorist organisation and warned that any Vietnamese found to be involved with the group would be regarded as co-conspirators and punished.

The government said the California-based Viet Tan, or Vietnam Reform Party, had recruited and trained operatives to use weapons and explosives.

EXHIBIT 5

Please Note: The total \$2,200 reported cash is **highlighted in bold**.

**Cash donated to Human Rights for Vietnam PAC for 5/12/2013
fundraising event**

Below is the compiled data from

<https://www.opensecrets.org/pacs/pacgave2.php?cmte=C00517060&cycle=2014>

Contributions to this PAC in 2013

CONTRIBUTORS	CITY	STATE	ZIP CODE	RECEIPT DATE	AMOUNT
BACH, TUAN V	EVERETT	WA	98208	6/3/2013	\$200.00
BUI, ANH N	NEPTUNE	NJ	7753	10/7/2013	\$100.00
BUI, ANH N	NEPTUNE	NJ	7753	2/19/2013	\$100.00
BUI, ANH N	NEPTUNE	NJ	7753	6/18/2013	\$100.00
BUI, ANH N	NEPTUNE	NJ	7753	5/15/2013	\$100.00
BUI, HIEN	STATEN ISLAND	NY	10305	1/25/2013	\$500.00
BUI, HUE T	DENVER	CO	80246	5/28/2013	\$200.00
BUI, HUE T	DENVER	CO	80246	5/28/2013	\$0.00
BUI, KIM OANH T	SAN JOSE	CA	95127	2/11/2013	\$100.00
BUI, KIM OANH T	SAN JOSE	CA	95127	5/15/2013	\$100.00
BUI, MINH HUAN	SEATTLE	WA	98118	6/4/2013	\$200.00
BUI, PHUOC	ARLINGTON	TX	76015	5/15/2013	\$200.00
BUI, PHUONG	RALEIGH	NC	27604	5/14/2013	\$200.00
CAI, SAU H	QUINCY	MA	2169	10/17/2013	\$500.00
CAN, DOAN THANH	WESTMINSTER	CO	80021	5/27/2013	\$200.00
DANG, LANG KIM	MONTEREY PARK	CA	91754	7/1/2013	\$100.00
DANG, THANH QUANG	TUKWILA	WA	98168	9/12/2013	\$200.00
DANG, THANH QUANG	TUKWILA	WA	98168	4/23/2013	\$200.00
DAO, HIEN T	STERLING	VA	20166	5/28/2013	\$200.00
DAO, HUYEN	COLORADO SPRINGS	CO	80918	6/11/2013	\$200.00
DIEP, TAI	SAN DIEGO	CA	92131	8/1/2013	\$200.00
DIEP, TAI	SAN DIEGO	CA	92131	4/7/2013	\$300.00
DIEP, VU THI	PHILADELPHIA	PA	19142	5/12/2013	\$500.00
DINH, PHUC DANG	LAWRENCEVILLE	GA	30043	4/8/2013	\$200.00
DINH, TAM	LACEY	WA	98503	8/6/2013	\$200.00
DINH, TRINH V	BURKE	VA	22015	5/20/2013	\$200.00
DINH, TUYET T	GILBERT	AZ	85233	7/24/2013	\$200.00
DO, KIM H	CHESTERFIELD	MO	63017	1/2/2013	\$200.00

DO, NGHIEM VAN	HOUSTON	TX	77041	2/4/2013	\$200.00
DOAN, JOHN	HOUSTON	TX	77041	10/8/2013	\$200.00
DOAN, NGUYET TAN	HOUSTON	TX	77066	5/28/2013	\$200.00
DOAN, VINH	SAN JOSE	CA	95131	6/10/2013	\$200.00
DOAN, VUI VAN	MORROW	GA	30260	5/15/2013	\$200.00
DOKY, THUDZUNG	MONTEBELLO	CA	90640	6/6/2013	\$200.00
DU, KHIEM VAN	MONROVIA	CA	91016	10/10/2013	\$100.00
DU, KHIEM VAN	MONROVIA	CA	91016	8/8/2013	\$100.00
DU, KHIEM VAN	MONROVIA	CA	91016	7/12/2013	\$100.00
DU, KHIEM VAN	MONROVIA	CA	91016	2/7/2013	\$100.00
DU, KHIEM VAN	MONROVIA	CA	91016	5/9/2013	\$100.00
DU, KHIEM VAN	MONROVIA	CA	91016	6/10/2013	\$100.00
DU, KHIEM VAN	MONROVIA	CA	91016	3/7/2013	\$100.00
DUONG, AI XUAN	RICHMOND	VA	23226	5/24/2013	\$200.00
DUONG, DENNIS	HOUSTON	TX	77089	1/14/2013	\$200.00
DUONG, DENNIS	HOUSTON	TX	77089	1/14/2013	\$200.00
DUONG, HUAN N	SAINT PAUL	MN	55104	2/5/2013	\$100.00
DUONG, HUAN N	SAINT PAUL	MN	55104	6/7/2013	\$100.00
DUONG, LAC QUANG	SAN JOSE	CA	95112	5/24/2013	\$100.00
DUONG, LAC QUANG	SAN JOSE	CA	95112	2/13/2013	\$100.00
DUONG, LANG THI	OCOE	FL	34761	10/25/2013	\$100.00
DUONG, LANG THI	OCOE	FL	34761	8/28/2013	\$100.00
DUONG, LANG THI	OCOE	FL	34761	7/1/2013	\$100.00
DUONG, LANG THI	OCOE	FL	34761	10/25/2013	\$100.00
DUONG, LANG THI	OCOE	FL	34761	2/22/2013	\$100.00
DUONG, LANG THI	OCOE	FL	34761	5/12/2013	\$100.00
DUONG, LANG THI	OCOE	FL	34761	4/8/2013	\$100.00
DUONG, LANG THI	OCOE	FL	34761	1/28/2013	\$100.00
DUONG, LANG THI	OCOE	FL	34761	3/14/2013	\$100.00
DUONG, NHAM VAN	CHARLOTTE	NC	28210	7/11/2013	\$500.00
FAIR EAST DENTAL	SAN DIEGO	CA	92105	5/20/2013	\$200.00
GAO, DIANA MYXUAN DO	SPRING VALLEY	CA	91977	5/27/2013	\$400.00
HA, CAM XUAN THI	CHARLOTTE	NC	28262	3/4/2013	\$100.00
HA, CAM XUAN THI	CHARLOTTE	NC	28262	5/21/2013	\$200.00
HA, CUC	RENTON	WA	98057	12/18/2013	\$100.00
HA, CUC	RENTON	WA	98057	1/7/2013	\$100.00
HA, CUC	RENTON	WA	98057	6/17/2013	\$100.00
HOANG, DA LOC BA	HOUSTON	TX	77083	12/18/2013	\$2,164.00
HOANG, HOI VAN	HUNTINGTON BEACH	CA	92647	6/14/2013	\$100.00
HOANG, HOI VAN	HUNTINGTON	CA	92647	6/14/2013	\$100.00

	BEACH				
HOANG, MUNG THI	GARLAND	TX	75040	10/7/2013	\$200.00
HOANG, QUY	GARDEN GROVE	CA	92844	5/29/2013	\$500.00
HOANG, THONG D	AVONDALE	AZ	85392	5/23/2013	\$200.00
HOANG, VAN	ALOHA	OR	97006	8/27/2013	\$100.00
HOANG, VAN	ALOHA	OR	97006	9/24/2013	\$50.00
HOANG, VAN	ALOHA	OR	97006	12/4/2013	\$50.00
HOANG, VAN	ALOHA	OR	97006	10/25/2013	\$50.00
HOANG, VAN	ALOHA	OR	97006	6/25/2013	\$50.00
HOANG, VAN	ALOHA	OR	97006	3/26/2013	\$50.00
HOANG, VAN	ALOHA	OR	97006	4/23/2013	\$50.00
HOANG, VAN	ALOHA	OR	97006	5/28/2013	\$50.00
HOANG, VAN	ALOHA	OR	97006	1/21/2013	\$50.00
HOANG, VAN	ALOHA	OR	97006	2/27/2013	\$50.00
HOANG, VIET QUOC	SAN DIEGO	CA	92120	5/15/2013	\$200.00
HUYNH, BILLY	SAN DIEGO	CA	92028	5/15/2013	\$200.00
HUYNH, CONNIE	MILPITAS	CA	95035	4/19/2013	\$200.00
HUYNH, CONNIE	MILPITAS	CA	95035	4/19/2013	\$50.00
HUYNH, MINH	SEATTLE	WA	98118	5/16/2013	\$200.00
HUYNH, NGA	EL MONTE	CA	91731	6/11/2013	\$1,000.00
HUYNH, TAI DAT	SAINT JOSEPH	MI	49085	5/13/2013	\$200.00
HUYNH, THANG PHUC	INDIANAPOLIS	IN	46231	5/24/2013	\$500.00
HUYNH, THANH LAN THI	SPRINGFIELD	VA	22150	8/28/2013	\$50.00
HUYNH, THANH THI	SPRINGFIELD	VA	22150	5/15/2013	\$300.00
HUYNH, YEN	NORCROSS	GA	30093	5/14/2013	\$200.00
KHO, YIN TAT W	FULLERTON	CA	92804	5/15/2013	\$200.00
KHONG, PHONG QUOC	GARDEN GROVE	CA	92841	1/22/2013	\$200.00
KHUU, QUAN	DALLAS	TX	75287	1/14/2013	\$200.00
LANG, HANNAH	OKLAHOMA CITY	OK	73101	5/28/2013	\$200.00
LAURIE'S NAILS	SAN ANOTONIO	TX	78238	9/10/2013	\$100.00
LE, HENRY H	ARLINGTON	TX	76001	3/1/2013	\$200.00
LE, HIEP V	LOMA LINDA	CA	92354	5/21/2013	\$200.00
LE, HOA T	ARVADA	CO	80003	5/10/2013	\$500.00
LE, KHA VAN	CHANDLER	AZ	85225	9/3/2013	\$400.00
LE, KHA VAN	CHANDLER	AZ	85225	7/23/2013	\$500.00
LE, KHA VAN	CHANDLER	AZ	85225	6/12/2013	\$500.00
LE, KHA VAN	CHANDLER	AZ	85225	3/7/2013	\$1,000.00
LE, KHA VAN	CHANDLER	AZ	85225	4/10/2013	\$800.00
LE, KHA VAN	CHANDLER	AZ	85225	2/7/2013	\$1,000.00
LE, KHA VAN	CHANDLER	AZ	85225	1/7/2013	\$500.00
LE, KHA VAN	CHANDLER	AZ	85225	5/15/2013	\$800.00
LE, LINH	GRAND RAPIDS	MI	49507	5/28/2013	\$200.00

LE, LY MINH	FOUNTAIN VALLEY	CA	92708	5/16/2013	\$200.00
LE, MINH NGOC THI	BATON ROUGE	LA	70810	5/14/2013	\$200.00
LE, NGUYET NGA THI	RENTON	WA	98056	1/10/2013	\$40.00
LE, NGUYET NGA THI	RENTON	WA	98056	3/18/2013	\$40.00
LE, NGUYET NGA THI	RENTON	WA	98056	4/22/2013	\$40.00
LE, NGUYET NGA THI	RENTON	WA	98056	2/8/2013	\$40.00
LE, NGUYET NGA THI	RENTON	WA	98056	5/9/2013	\$40.00
LE, NHI T	GRETNA	LA	70056	8/2/2013	\$200.00
LE, THANH	ARLINGTON	TX	76014	5/29/2013	\$300.00
LE, THAP V	SAN DIEGO	CA	92131	11/11/2013	\$100.00
LE, THUY D	EDMONDS	WA	98026	4/11/2013	\$300.00
LE, TUYEN T	SAN DIEGO	CA	92109	5/29/2013	\$600.00
LE, YVONNE NGUYEN	SAN LEANDRO	CA	94579	12/9/2014	\$20.00
LE, YVONNE NGUYEN	SAN LEANDRO	CA	94579	8/1/2013	\$20.00
LE, YVONNE NGUYEN	SAN LEANDRO	CA	94579	7/1/2013	\$20.00
LE, YVONNE NGUYEN	SAN LEANDRO	CA	94579	11/11/2013	\$20.00
LE, YVONNE NGUYEN	SAN LEANDRO	CA	94579	10/8/2013	\$20.00
LE, YVONNE NGUYEN	SAN LEANDRO	CA	94579	12/6/2013	\$20.00
LE, YVONNE NGUYEN	SAN LEANDRO	CA	94579	9/3/2013	\$20.00
LE, YVONNE NGUYEN	SAN LEANDRO	CA	94579	10/9/2014	\$20.00
LE, YVONNE NGUYEN	SAN LEANDRO	CA	94579	11/13/2014	\$20.00
LU, CHUA	HOUSTON	TX	77099	5/24/2013	\$500.00
LUONG, BINH THI	SAN JOSE	CA	95121	5/22/2013	\$200.00
LUONG, NHU NGHIA NGUYEN	WORCHESTER	MA	1602	10/17/2013	\$300.00
LUU, CHAU VAN	SEATTLE	WA	98144	8/1/2013	\$100.00
LUU, CHAU VAN	SEATTLE	WA	98144	9/20/2013	\$100.00
LY, HANH H	WINTER PARK	FL	32792	11/10/2014	\$200.00
LY, HUONG THI	DORCHESTER CENTER	MA	2124	10/15/2013	\$200.00
LY, LUAN KHANH	FERNANDINA BEACH	FL	32034	5/20/2013	\$200.00

LY, TAM T	BROWNSVILLE21	TX	78521	5/24/2013	\$200.00
MAI, CHI V	MARRERO	LA	70072	5/16/2013	\$200.00
MAI, PHUNG THI	STOCKTON	CA	95210	7/1/2014	\$70.00
NGO, KHANH N	LYNN	MA	1902	8/17/2013	\$100.00
NGO, TO QUANG	BLOOMINGTON	MN	55420	10/14/2013	\$100.00
NGO, VAN TRANG T	SUWANEE	GA	30024	12/8/2014	\$200.00
NGO, VAN TRANG T	SUWANEE	GA	30024	4/10/2014	\$300.00
NGO, VAN TRANG T	SUWANEE	GA	30024	5/24/2013	\$300.00
NGUY, HONG	LAS VEGAS	NV	89103	8/15/2013	\$200.00
NGUYEN ARDL, KIM	EL DORADO	AR	71730	7/29/2013	\$100.00
NGUYEN ARDL, KIM	EL DORADO	AR	71730	5/16/2013	\$200.00
NGUYEN, A VAN	SAN DIEGO	CA	92126	7/1/2013	\$200.00
NGUYEN, ANH	HOUSTON	TX	77088	5/16/2013	\$200.00
NGUYEN, BA NGU	OLYMPIA	WA	98506	2/17/2014	\$500.00
NGUYEN, BINH THE	MCLEAN	VA	22102	5/23/2013	\$2,000.00
NGUYEN, CHASTITY	GARDEN CITY	KS	67846	6/17/2013	\$200.00
NGUYEN, CHAU M	HYDE PARK	MA	2136	5/16/2013	\$200.00
NGUYEN, CHAU V	PORTLAND	OR	97233	5/20/2013	\$200.00
NGUYEN, CHI THI	CHELMSFORD	MA	1824	11/11/2013	\$200.00
NGUYEN, CHRISTINA TRINH	LAGUNA NIGUEL	CA	92677	3/12/2014	\$200.00
NGUYEN, CHRISTINA TRINH	LAGUNA NIGUEL	CA	92677	2/12/2014	\$200.00
NGUYEN, CHRISTINA TRINH	LAGUNA NIGUEL	CA	92677	9/18/2013	\$200.00
NGUYEN, CHRISTINA TRINH	LAGUNA NIGUEL	CA	92677	6/12/2014	\$200.00
NGUYEN, CHRISTINA TRINH	LAGUNA NIGUEL	CA	92677	10/2/2014	\$100.00
NGUYEN, CHUNG QUANG	ST PAUL	MN	55104	12/17/2014	\$100.00
NGUYEN, CHUNG QUANG	ST PAUL	MN	55104	2/4/2013	\$200.00
NGUYEN, CHUNG QUANG	ST PAUL	MN	55104	7/1/2014	\$100.00
NGUYEN, CHUNG QUANG	ST PAUL	MN	55104	9/17/2014	\$100.00
NGUYEN, CONG	WINTER HAVEN	FL	33884	5/17/2013	\$200.00
NGUYEN, DIEUQUYEN KHOA	GARDEN GROVE	CA	92841	10/25/2013	\$815.00
NGUYEN, DIEUQUYEN KHOA	GARDEN GROVE	CA	92841	10/18/2013	\$1,000.00
NGUYEN, DIEUQUYEN KHOA	GARDEN GROVE	CA	92841	10/18/2013	\$1,000.00
NGUYEN, DIEUQUYEN KHOA	GARDEN GROVE	CA	92841	5/10/2013	\$1,260.00

NGUYEN, DUNG	SUNNYVALE	CA	94089	12/2/2013	\$50.00
NGUYEN, DUNG	SUNNYVALE	CA	94089	10/21/2013	\$50.00
NGUYEN, DUNG	SUNNYVALE	CA	94089	8/12/2013	\$50.00
NGUYEN, DZUNG VIET	ORANGE	CA	92867	8/7/2013	\$30.00
NGUYEN, DZUNG VIET	ORANGE	CA	92867	7/12/2013	\$30.00
NGUYEN, DZUNG VIET	ORANGE	CA	92867	10/7/2013	\$30.00
NGUYEN, FRANK THACBA	MONTGOMERY	AL	36117	2/19/2013	\$250.00
NGUYEN, HA HONG	SAN LEANDRO	CA	94579	7/29/2013	\$500.00
NGUYEN, HAU T	BOSTON	MA	2125	10/16/2013	\$500.00
NGUYEN, HAU T	BOSTON	MA	2125	8/12/2013	\$100.00
NGUYEN, HAU VAN	ERIE	PA	16505	1/21/2013	\$100.00
NGUYEN, HAU VAN	ERIE	PA	16505	5/24/2013	\$100.00
NGUYEN, HIEN VAN	SANTA CLARA	CA	95051	12/12/2014	\$50.00
NGUYEN, HIEN VAN	SANTA CLARA	CA	95051	12/8/2014	\$50.00
NGUYEN, HIEN VAN	SANTA CLARA	CA	95051	10/8/2014	\$50.00
NGUYEN, HIEU	QUINCY	MA	2171	10/16/2013	\$200.00
NGUYEN, HOA THI	SEATTLE	WA	93118	10/22/2013	\$50.00
NGUYEN, HOA THI	SEATTLE	WA	93118	8/13/2013	\$50.00
NGUYEN, HONG DUC	LAFAYETTE	CO	80026	5/14/2013	\$200.00
NGUYEN, HUONG THU	CARMICHAEL	CA	95608	3/18/2013	\$200.00
NGUYEN, HUONG THU	CARMICHAEL	CA	95608	5/22/2013	\$200.00
NGUYEN, HUONG VAN	CHULA VISTA	CA	91911	1/22/2014	\$100.00
NGUYEN, HUONG VAN	CHULA VISTA	CA	91911	1/22/2014	\$100.00
NGUYEN, HUONG VAN	CHULA VISTA	CA	91911	1/17/2013	\$100.00
NGUYEN, HUONG VAN	CHULA VISTA	CA	91911	1/17/2013	\$100.00
NGUYEN, HY HUU	STONE MOUNTAIN	GA	30083	5/16/2013	\$200.00
NGUYEN, JASMINE HUYEN	SANTA ANA	CA	92703	1/31/2014	\$5,000.00
NGUYEN, KHANH	ARLINGTON	VA	22203	12/18/2013	\$100.00
NGUYEN, KHANH DUNG VU	LOUISVILLE	KY	40245	11/11/2013	\$1,000.00
NGUYEN, KHANH TUAN	ATLANTA	GA	30044	5/14/2013	\$300.00
NGUYEN, KHEO THI	HOUSTON	TX	77053	5/21/2013	\$300.00
NGUYEN, KIM D	DULUTH	GA	30097	5/16/2013	\$200.00

NGUYEN, KIM HUONG THI	MIAMI	OK	74354	5/21/2013	\$200.00
NGUYEN, KIMDZUNG T	UNION	NJ	7083	5/16/2013	\$200.00
NGUYEN, KY THANH	HOUSTON	TX	77040	5/12/2013	\$200.00
NGUYEN, LE HUU	KENT	WA	98031	5/16/2013	\$200.00
NGUYEN, LE THI	NEW YORK	NY	10011	5/29/2013	\$200.00
NGUYEN, LINH VI	ALBUQUERQUE	NM	87110	5/29/2013	\$200.00
NGUYEN, MAI	HAMMOND	IN	46324	5/21/2013	\$300.00
NGUYEN, MAI THI	CROSS LANES	WV	25313	8/1/2013	\$50.00
NGUYEN, MAI THI	CROSS LANES	WV	25313	3/28/2013	\$100.00
NGUYEN, MAI THI	CROSS LANES	WV	25313	5/15/2013	\$100.00
NGUYEN, MICHELLE HANH	SUGAR HILL	GA	30518	5/24/2013	\$100.00
NGUYEN, MICHELLE HANH	SUGAR HILL	GA	30518	5/15/2013	\$200.00
NGUYEN, MINH	MINNEAPOLIS	MN	55444	5/29/2013	\$200.00
NGUYEN, MINH T	ELYRIA	OH	44035	6/3/2013	\$200.00
NGUYEN, MINH VAN	SAN JOSE	CA	95112	5/29/2013	\$200.00
NGUYEN, NGA THI	OCOEE	FL	34761	5/12/2014	\$500.00
NGUYEN, NGA THI	OCOEE	FL	34761	9/10/2014	\$400.00
NGUYEN, NGA THI	OCOEE	FL	34761	11/14/2014	\$100.00
NGUYEN, NGA THI	OCOEE	FL	34761	10/17/2014	\$100.00
NGUYEN, NGAN	PORT ORCHARD	WA	98366	2/1/2013	\$1,000.00
NGUYEN, NGAN THUY	PORT ORCHARD	WA	98366	5/27/2014	\$1,000.00
NGUYEN, NGOC THANH	MIRAMAR	FL	33027	5/16/2013	\$100.00
NGUYEN, NGOC THANH	MIRAMAR	FL	33027	3/25/2013	\$100.00
NGUYEN, NGON	NEWARK	CA	94560	5/16/2013	\$200.00
NGUYEN, NHON DAI	READING	PA	19605	5/17/2013	\$200.00
NGUYEN, PHONG	KEIZER	OR	97303	5/12/2013	\$200.00
NGUYEN, PHONG	GARDEN GROVE	CA	92844	5/12/2013	\$200.00
NGUYEN, RE VAN	SAN DIEGO	CA	92126	5/15/2013	\$500.00
NGUYEN, SANG	SAN JOSE	CA	95136	5/16/2013	\$200.00
NGUYEN, SANG VAN	WICHITA	KS	67214	9/25/2013	\$580.00
NGUYEN, SAU	SUNNYVALE	CA	94085	5/14/2013	\$200.00
NGUYEN, TAM THI MINH	SAN JOSE	CA	95148	5/16/2013	\$200.00
NGUYEN, THAI HOA T	FALLBROOK	CA	92028	9/18/2013	\$300.00

NGUYEN, THAIBINH T	JACKSONVILLE	FL	32218	6/7/2013	\$200.00
NGUYEN, THANH VAN	ALLENTOWN	PA	18104	9/17/2013	\$250.00
NGUYEN, THANH VAN	ALLENTOWN	PA	18104	9/17/2013	\$250.00
NGUYEN, THANH VAN	ALLENTOWN	PA	18104	3/11/2013	\$250.00
NGUYEN, THANH VAN	ALLENTOWN	PA	18104	3/6/2013	\$250.00
NGUYEN, THERESA O	ANTHEM	AZ	85086	9/23/2013	\$200.00
NGUYEN, THUDAN	GAINESVILLE	FL	32653	4/22/2013	\$200.00
NGUYEN, TONY	WICHITA	KS	67226	5/29/2013	\$200.00
NGUYEN, TRI HUU	WOODBIDGE	VA	22193	5/23/2013	\$200.00
NGUYEN, TRIEN VAN	STAFFORD	TX	77477	12/18/2013	\$100.00
NGUYEN, TRIEN VAN	STAFFORD	TX	77477	11/13/2013	\$100.00
NGUYEN, TRIEN VAN	STAFFORD	TX	77477	8/6/2013	\$100.00
NGUYEN, TRIEN VAN	STAFFORD	TX	77477	10/10/2013	\$100.00
NGUYEN, TRIEN VAN	STAFFORD	TX	77477	6/10/2013	\$100.00
NGUYEN, TRIEN VAN	STAFFORD	TX	77477	2/7/2013	\$100.00
NGUYEN, TRIEN VAN	STAFFORD	TX	77477	3/7/2013	\$100.00
NGUYEN, TRIEN VAN	STAFFORD	TX	77477	4/8/2013	\$100.00
NGUYEN, TRIEN VAN	STAFFORD	TX	77477	5/6/2013	\$100.00
NGUYEN, TRUC VAN	TACOMA	WA	98405	10/10/2013	\$100.00
NGUYEN, TUONG THI	CHATTAHOOCHEE	FL	32324	5/15/2013	\$200.00
NGUYEN, UYEN DINH TO	REDONDON BEACH	CA	90278	4/18/2013	\$300.00
NGUYEN, VAN	BOSTON	MI	2124	5/16/2013	\$200.00
NGUYEN, VAN	CHICAGO	IL	60630	5/13/2013	\$200.00
NGUYEN, VINH H	UNION	NJ	7083	4/1/2013	\$200.00
NGUYEN, VINH V	CARROLLTON	TX	75007	3/29/2013	\$100.00
NGUYEN, VINH V	CARROLLTON	TX	75007	5/24/2013	\$100.00
NHAN, VIET	CITRUS HEIGHTS	CA	95621	11/13/2013	\$94.00
ORIENTAL WELDING & IRON	FOUNTAIN VALLEY	CA	92708	5/21/2013	\$200.00

WORK					
PHAM, CHAT	ARLINGTON	TX	76017	9/16/2013	\$1,000.00
PHAM, CHAU	CORONA	CA	92883	5/28/2013	\$300.00
PHAM, CHRISTOPHER H	SACRAMENTO	CA	95822	9/17/2013	\$100.00
PHAM, CHRISTOPHER H	SACRAMENTO	CA	95822	4/17/2013	\$100.00
PHAM, CHRISTOPHER H	SACRAMENTO	CA	95822	1/9/2013	\$100.00
PHAM, CHRISTOPHER H	SACRAMENTO	CA	95822	5/21/2013	\$100.00
PHAM, DANNY	JERSEY CITY	NJ	7306	8/30/2013	\$100.00
PHAM, DAVID	SAN DIEGO	CA	92105	5/24/2013	\$200.00
PHAM, DUC D	ANNANDALE	VA	22003	5/17/2013	\$250.00
PHAM, LOAN T	PORT LAVACA	TX	77979	5/20/2013	\$200.00
PHAM, PETER	SANTA CLARA	CA	95051	5/28/2013	\$300.00
PHAM, TAI T	LAWRENCE	MA	1843	8/12/2013	\$200.00
PHAM, TAI T	LAWRENCE	MA	1843	2/18/2013	\$200.00
PHAM, TAI T	LAWRENCE	MA	1843	6/7/2013	\$200.00
PHAM, TAI T	LAWRENCE	MA	1843	5/28/2013	\$200.00
PHAM, THANH	MURRIETA	CA	92563	5/12/2013	\$500.00
PHAM, THINH	SAN RAMON	CA	94582	5/20/2013	\$200.00
PHAM, TRONG	HOUSTON	TX	77083	5/29/2013	\$200.00
PHAM, TUAN	GARDEN GROVE	CA	92843	7/19/2013	\$200.00
PHAM, UNG VAN	NEWHALL	CA	91322	5/15/2013	\$200.00
PHAN, BICH VAN T	GRAND PRAIRIE	TX	75054	5/16/2013	\$200.00
PHAN, KIM NGUYEN	KECHI	KS	67067	8/14/2014	\$200.00
PHAN, LINH DINH	SANFORD	NC	27332	5/16/2013	\$200.00
PHAN, THANH L	JAMAICA PLAIN	MA	2130	10/16/2013	\$1,000.00
PHO, HUYNH HONG	HARRISBURG	PA	17104	11/27/2013	\$100.00
POHLEL, ZARINA V	COLUMBIA	SC	29203	5/21/2013	\$1,000.00
TA, HOANG	AVENEL	NJ	7001	9/9/2013	\$200.00
TA, TRUNG MINH	ELGIN	IL	60123	5/20/2013	\$200.00
TEITLER, ANH L	CONROE	TX	77384	3/22/2013	\$200.00
TEITLER, ANH L	CONROE	TX	77384	5/17/2013	\$200.00
TON, AN N	SUGAR LAND	TX	77498	11/12/2013	\$200.00
TON, CHI	CAROL STREAM	IL	60188	5/27/2013	\$250.00
TONG, MAN MINH	COMMERCE CITY	CO	80022	5/14/2013	\$300.00
TRAM, PHUONG VU	NEW ORLEANS	LA	70131	3/8/2013	\$200.00
TRAN, DE HUU	ORLANDO	FL	32839	9/12/2013	\$100.00
TRAN, DE HUU	ORLANDO	FL	32839	7/1/2013	\$100.00
TRAN, DE HUU	ORLANDO	FL	32839	2/13/2013	\$200.00
TRAN, DIEP H	FRESNO	CA	93720	5/15/2013	\$200.00
TRAN, HELEN H	SPRINGFIELD	TN	37172	8/5/2013	\$200.00
TRAN, HIEP VAN	HOUSTON	TX	77089	5/16/2013	\$200.00

TRAN, HOANG D	LEWISVILLE	TX	75077	5/16/2013	\$200.00
TRAN, JONATHAN HUU	HAYWARD	CA	94544	5/20/2013	\$200.00
TRAN, KHIEM	BOSTON	MA	2127	5/16/2013	\$200.00
TRAN, MAI THANH THI	KENT	WA	98031	5/17/2013	\$300.00
TRAN, MANDY	PLANO	TX	75093	9/24/2013	\$200.00
TRAN, MINH N	SAN BRUNO	CA	94066	1/28/2013	\$200.00
TRAN, PHAN	SILVERSPRING	MD	20906	5/12/2013	\$200.00
TRAN, PHILLIP	SAN FRANCISCO	CA	94115	1/27/2014	\$100.00
TRAN, PHILLIP	SAN FRANCISCO	CA	94115	3/12/2014	\$100.00
TRAN, PHILLIP	SAN FRANCISCO	CA	94115	9/24/2013	\$100.00
TRAN, PHILLIP	SAN FRANCISCO	CA	94115	10/25/2013	\$100.00
TRAN, PHILLIP	SAN FRANCISCO	CA	94115	12/4/2013	\$100.00
TRAN, PHILLIP	SAN FRANCISCO	CA	94115	2/22/2013	\$100.00
TRAN, PHILLIP	SAN FRANCISCO	CA	94115	3/25/2013	\$100.00
TRAN, PHILLIP	SAN FRANCISCO	CA	94115	1/22/2013	\$100.00
TRAN, PHILLIP	SAN FRANCISCO	CA	94115	5/28/2013	\$100.00
TRAN, PHILLIP	SAN FRANCISCO	CA	94115	4/22/2013	\$100.00
TRAN, PHILLIP	SAN FRANCISCO	CA	94115	6/25/2013	\$100.00
TRAN, PHU	ANAHEIM	CA	92805	5/29/2013	\$200.00
TRAN, PHUC VAN	WICHITA	KS	67216	5/17/2013	\$200.00
TRAN, QUANG QUOC	CLEARWATER	FL	33760	6/4/2013	\$200.00
TRAN, SACH TONY	NEWARK	CA	94560	11/12/2013	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	10/10/2013	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	9/17/2013	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	9/10/2013	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	12/18/2013	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	7/29/2013	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	11/27/2013	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	5/5/2014	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	5/13/2014	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	6/4/2014	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	5/6/2013	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	1/7/2013	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	2/6/2013	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	3/4/2013	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	6/13/2013	\$50.00
TRAN, SACH TONY	NEWARK	CA	94560	7/8/2014	\$50.00
TRAN, STEVE	LINCOLN	NE	68521	7/1/2013	\$25.00
TRAN, STEVE	LINCOLN	NE	68521	10/8/2013	\$25.00
TRAN, STEVE	LINCOLN	NE	68521	11/13/2013	\$25.00
TRAN, STEVE	LINCOLN	NE	68521	9/3/2013	\$25.00
TRAN, STEVE	LINCOLN	NE	68521	12/2/2013	\$25.00
TRAN, STEVE	LINCOLN	NE	68521	8/1/2013	\$25.00

TRAN, THIET V	NEW ORLEANS	LA	70129	7/26/2013	\$200.00
TRAN, TOT H	AVON	IN	46123	7/1/2013	\$99.00
TRAN, TRUNG DINH	WEST HARTFORD	CT	6110	5/17/2013	\$250.00
TRAN, XUAN T	SILVER SPRING	MD	20904	6/4/2014	\$200.00
TRAN, XUAN T	SILVER SPRING	MD	20904	1/17/2013	\$200.00
TRINH, AN H	SAN JOSE	CA	95116	5/15/2013	\$200.00
TRINH, QUAN	GARDEN GROVE	CA	92841	5/16/2013	\$200.00
TRUONG, HUY VAN	ARLINGTON	TX	76016	5/17/2013	\$500.00
TRUONG, TANG		PA	19120	5/24/2013	\$250.00
TRUONG, TRUNG	DANHAM	MD	20706	5/17/2013	\$300.00
VAN PHARMACY	GARDEN GROVE	CA	92843	3/21/2014	\$200.00
VIETNAMESE SENIOR ASSN. OF OLYMPIA	OLYMPIA	WA	98506	12/19/2013	\$500.00
VO, COLLEEN	GARDEN GROVE	CA	92841	4/11/2014	\$1,200.00
VO, DONG THI	WILMINGTON	NC	28405	12/10/2014	\$500.00
VO, DONG THI	WILMINGTON	NC	28405	5/23/2013	\$1,000.00
VO, HA V	FORT WORTH	TX	76133	5/20/2013	\$200.00
VO, TRAN T	SAN JOSE	CA	95136	5/28/2013	\$500.00
VO, TRINH NGOC	ORLANDO	FL	32818	1/24/2014	\$200.00
VU, HANNAH HONG HANH	SEAL BEACH	CA	90740	6/20/2013	\$500.00
VU, JOSEPH	FAYETTEVILLE	AR	72701	10/25/2013	\$50.00
VU, JOSEPH	FAYETTEVILLE	AR	72701	10/25/2013	\$50.00
VU, JOSEPH	FAYETTEVILLE	AR	72701	8/28/2013	\$50.00
VU, JOSEPH	FAYETTEVILLE	AR	72701	7/26/2013	\$50.00
VU, JOSEPH	FAYETTEVILLE	AR	72701	7/1/2013	\$50.00
VU, JOSEPH	FAYETTEVILLE	AR	72701	3/13/2013	\$50.00
VU, JOSEPH	FAYETTEVILLE	AR	72701	4/23/2013	\$50.00
VU, JOSEPH	FAYETTEVILLE	AR	72701	5/27/2013	\$50.00
VU, JOSEPH	FAYETTEVILLE	AR	72701	1/28/2013	\$50.00
VU, JOSEPH	FAYETTEVILLE	AR	72701	2/22/2013	\$50.00
VU, MINH THI	DORCHESTER	MA	2125	5/20/2013	\$200.00
VU, THIEN LY THI	SAN JOSE	CA	95132	5/24/2013	\$200.00
VU, THIEN LY THI	SAN JOSE	CA	95132	5/24/2013	\$0.00
VU, THIEN LY THI	SAN JOSE	CA	95132	5/24/2013	\$200.00
VUONG, THEM	KIRKLAND	WA	98033	5/24/2013	\$200.00
VUONG, VAN TUYET	AUSTIN	TX	78739	12/8/2014	\$100.00