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July 27, 2015

Jeff S. Jordon, Esq.
Assistant General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 6938 – Peter Schweizer

Dear Mr. Jordan:

We are submitting this letter and the annexed affidavit in response to the complaint filed by the American Democracy Legal Fund, hereinafter denominated MUR 6938 or Complaint. The Complaint alleges that Peter Schweizer, the author of *Clinton Cash* (the "Book"), published by HarperCollins Publishers LLC ("HarperCollins"), violated 11 C.F.R. §110 1(b), and more generally the Federal Election Campaign Act of 1971, as amended ("FECA"), under the theory that when Mr. Schweizer briefed Senator Rand Paul regarding the Book's contents prior to its formal release, Mr. Schweizer made an excessive campaign contribution. The Complaint is a blatant attempt to use the Federal Election Commission as a bludgeon against the First Amendment rights of Mr. Schweizer through dubious claims, which simply do not constitute a cognizable violation of FECA.

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Background

Mr. Schweizer is an accomplished author, journalist and researcher who has previously written about government waste, inefficiency, and potential illegality. He is the author of *Extortion: How Politicians Extract Your Money, Buy Votes, and Line Their Own Pockets* (2013), and *Throw Them All Out: How Politicians and Their Friends Get Rich Off Insider Stock Tips, Land Deals, and Cronyism That Would Send the Rest of Us to Prison* (2011), each of which was a New York Times best-seller that led to featured stories on 60 Minutes. Exhibit 1. Indeed, the later book detailed insider trading by members of Congress and led directly to the passage of the Stock Act, which mandated timely disclosure of all stock holdings and financial transactions by members of Congress.¹ Mr. Schweizer has also written over ten other published works of fiction and non-fiction. Moreover, Mr. Schweizer has written articles and appeared on news and other shows, as a commentator, including multiple appearances on 60 Minutes. He has also served as a consultant to the White House Office of Presidential Speechwriting and as a consultant to NBC News. He has a Bachelor of Science degree from George Washington University and received a Master of Philosophy from Oxford University. Exhibit 1

¹ Curtin, Stacy. "Obama Signs STOCK Act Prohibiting Congressional Insider Trading. But there's More to Be Done: Peter Schweizer." Yahoo Finance. 4 April 2012. Web. 2 July 2015. < http://finance.yahoo.com/blogs/daily-ticker/obama-signs-stock-act-still-more-done-peter-172415917.html;_ylt=A0LEV2AFxK9VDAUAxr5XNy0A;_ylu=X3oDMTEyZzRya2lxBGNvbG8DYmYxBHBvcwMxBHZ0aWQDQjAxNjJfMQRzZWMDc3I->

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The absence of candidates obviates the Complaint

The Complaint opens its legal argument by stating, "Federal law prohibits individuals from making a contribution in the aggregate in excess of more than \$2,700 to a **candidate** for federal office per election." (*emphasis added*). Of course, all parties are in total agreement with this statement of law, which is fully applicable to a **candidate**, which Mr. Paul was not on March 25, 2015, the date Mr. Schweizer discussed the Book, Exhibit 1. Mr. Paul became a candidate for President of the United States on April 7, 2015. Exhibit 2. The Complaint continues its legal argument by stating, "By giving Senator Paul access to the content of *Clinton Cash* before it was released to the general public, Schweizer and HarperCollins gave Senator Paul something of value in the form of information for him to use in his campaign against Secretary Clinton." However, as noted, Mr. Paul was not a candidate competing for the same federal office as Mrs. Clinton, indeed, Mrs. Clinton was not a candidate for any federal office at the time, rather she was a private citizen. Mrs. Clinton became a candidate for President of the United States on April 13, 2015. Exhibit 3. Therefore, since neither was a candidate at the time Mr. Paul and Mr. Schweizer spoke, there could not possibly have been a campaign contribution regarding a presidential election in which neither person allegedly impacted by this alleged contribution was a participant.

Rather, as indicated in Exhibit 1, Mr. Schweizer was aware that Senator Paul was a member of the United States Senate Foreign Relations Committee, and Chairman of the United

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Sates Senate Foreign Relations Subcommittee on International Operation and Organizations, Human Rights, Democracy and Global Women's Issues. In his role on both committees Senator Paul had a keen interest, and a duty, to pursue information which could indicate the former United States Secretary of State had engaged in unethical or illegal acts that compromised the best interests of the United States. For example, Mr. Schweizer wrote about Secretary Clinton's failure to disclose large contributions her family's foundation took from foreign governments, and Secretary Clinton's approval of a deal that gave the Russian State Atomic Nuclear Agency ("Rosatom") a controlling stake in an American Uranium mining company, Uranium One.² Each matter properly cognizable by the Senate Committee Mr. Paul served.

In late March of 2015, Mr. Schweizer was invited to meet with Senator Paul in his Senate Office to talk about the Book, including Mrs. Clinton's activities while serving as Secretary of State. The meeting with Senator Paul took place on March 25, 2015, in a Senate office, at which time they discussed Mr. Schweizer's research. Exhibit 1. At no time did they discuss the 2016 elections, Senator Paul's plans for 2016, or Mrs. Clinton's possible participation in a campaign. Exhibit 1. Indeed, predicated on the information Mr. Schweizer shared with Senator Paul, the Senator suggested he meet with Senator Robert Corker, the Chairman of the Senate Foreign Relations Committee, and his staff helped arrange a meeting for Mr. Schweizer and Senator

² Breitbart News. "11 Explosive Clinton Cash Facts Mainstream Media Confirm are Accurate." Breitbart News. 26 April 2015. Web. 2 July 2015. < <http://www.breitbart.com/big-government/2015/04/26/11-explosive-clinton-cash-facts-mainstream-media-confirm-are-accurate/>>.

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Corker on March 27th, a scant two days later. This second meeting was similar to the first, in that it occurred in a Senate office, the discussion was about issues of interest to the Senate Foreign Relations Committee, and it had nothing to do with the 2016 presidential campaign. Chairman Corker had several staff attend the meeting, but Senator Paul did not attend. Exhibit 1.

Mr. Schweizer did not advise HarperCollins of these meetings, or seek approval for them as he viewed the meetings as his duty as a United States citizen to share information of possible malfeasance by a high ranking government official with the appropriate government entity, rather than as a marketing endeavor for the Book. Exhibit 1. Any discussions Mr. Schweizer had with Senators Paul and Corker could not have been a campaign contribution related to the 2016 presidential elections because neither of the Senators, or Mrs. Clinton, was a candidate at the time of the meetings. Nor could the meetings in some magical way be converted into campaign contributions funded in whole or in part by a corporation, namely HarperCollins, because HarperCollins neither funded the meetings nor had knowledge of the meetings. To view these meetings in any other way would undermine the ability of the legislative and executive branches to function by making any "non-public information", including information otherwise marketable as research or teaching material, or a possible publication into a valuable campaign contribution when shared with a government official. That would in turn thrust the Federal Election Commission into the business of investigating the government's efforts to gather information whenever a candidate or potential candidate received such information.

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In the alternative, Mr. Schweizer was a volunteer

Even if you reject the logic and clear legal basis for finding that Mr. Schweizer did not make a campaign contribution when he spoke to Senator Paul, then you must consider Mr. Schweizer's conversation with the Senator, for which he was not compensated, as the act of a volunteer. Clearly, Mr. Schweizer met with Senator Paul without being compensated and with intent to voluntarily share information with him. It is blackletter law that a person may volunteer their services to a candidate or political party, "The value of services provided without compensation by any individual who volunteers on behalf of a candidate or political committee is not a contribution." 11 C.F.R. §100.74 Our research did not reveal a single prosecution of a volunteer sharing information with a candidate regarding his or her expertise or talent, be that public or non-public information; the basis of current research or teachings; or part of an unpublished book; or professional services usually performed for a charge. To the contrary, the media is rife with stories about volunteers briefing politicians and candidates to help them prepare a campaign, or to better understand current issues in topics as far flung as: foreign policy; climate change; international trade; tax policy; or health policy. For example, on November 12, 2012, the New York Times published a story, "Academic Dream Team Helped Obama's Effort", indicating the team included Dr. Craig Fox, a psychologist; Susan Fiske of Princeton University Samuel Popkin of the University of California, San Diego; Robert Cialdini, a professor emeritus at Arizona State University; Richard Thaler, a professor at the University of

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Chicago; and Michael Morris, a psychologist at Columbia.³ The headline on the July 6, 2015, Business Insider publication of an AP story was, "Hillary Clinton has consulted so many policy experts, her campaign has lost count".⁴ While on April 6, 2014 the Washington Post published, "In the 'credentials caucus,' GOP's 2016 hopefuls study policy and seek advisers", indicating that Governor Christie has consulted former secretaries of state Henry Kissinger and Condoleezza Rice, as well as Council on Foreign Relations President Richard N. Haass.⁵ Further, it reported that Senator Rubio regularly consults with Arthur Brooks, President of the American Enterprise Institute and columnist James Pethokoukis, while Senator Paul has received policy advice from Bill Gates and PayPal co-founder Peter Thiel.⁶ In a February 1, 2015 article, The Wall Street Journal reported, "In December, Mrs. Clinton presided over a meeting at a midtown Manhattan hotel that focused on middle-class Americans feeling pinched by slow wage growth."⁷ Among those who attended: Mr. Volcker, the architect of the "Volcker Rule," a regulatory measure barring banks from making risky bets with their own money; Jonathan Cowan, co-founder of the centrist think tank Third Way, which has been critical of some of the

³ Carey, Benedict. "Academic 'Dream Team' Helped Obama's Effort." The New York Times. 12 November 2012. Web. 2 July 2015. <<http://www.nytimes.com/2012/11/13/health/dream-team-of-behavioral-scientists-advised-obama-campaign.html>>.

⁴ Lerer, Lisa. "Hillary Clinton has consulted so many policy experts, her campaign has lost count." Business Insider. 6 July 2015. Web. 2 July 2015. <<http://www.businessinsider.com/hillary-clinton-has-a-luxury-few-candidates-enjoy-2015-7>>.

⁵ Rucker, Philip and Costa, Robert. "In the 'credentials caucus,' GOP's 2016 hopefuls study policy and seek advisers." The Washington Post. 6 April 2014. Web. 2 July 2015. <http://www.washingtonpost.com/politics/in-the-credentials-caucus-gops-2016-hopefuls-study-policy-and-seek-advisers/2014/04/06/cc97315e-bb48-11e3-9a05-c739f29ccb08_story.html>.

⁶ Id.

⁷ Nicholas, Peter. "Clinton Consults to Define Economic Pitch." The Wall Street Journal. 1 February 2015. Web. 2 July 2015. <<http://www.wsj.com/articles/clinton-consults-experts-to-define-economic-pitch-1422837490>>.

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populist rhetoric coming from the Democrats' liberal wing; and Alan Blinder, a Princeton professor and former Fed vice chairman and economics adviser to Mr. Clinton."⁸

Advisory Opinion 1980-42 (Haddon) noted, "the term 'contribution' does not include the value of services provided without compensation by any individual who volunteers on behalf of a candidate." The Opinion went on to hold that the voluntary services of a professional entertainer was not a contribution and noted prior opinions to the same effect involving entertainers and artists. Advisory Opinion 2012-16 (King, Pierce, Atwood LLP) reiterated that a law firm's partners, associates, and other employees, individually, may volunteer time in the form of legal or other services without providing a contribution. Simply put, the voluntary sharing of information, talent, or expertise with candidates has a long and storied tradition in America; a tradition that is critical to educating leaders and potential leaders, and reflects at least an individual's right to volunteer as a form of expression. To view such activity as enforceable violations of the Campaign Finance Law would turn every presidential candidate, and many of America's smartest and most revered thought leaders, attorneys and entertainers into violators of FECA.

The Book

Mr. Schweizer has a contract with HarperCollins to write and promote the Book, Clinton Cash. The contract recognizes Mr. Schweizer's copyright rights to the material and commits him

⁸ Id.

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to cooperate with HarperCollins in its role as the party responsible for the publication and promotion of the Book. Exhibit 1. As reported in the New York Times on March 23, 2015, the Times had an agreement with HarperCollins that gave it access to the Book well before its publication so that the Times could do a story building on a chapter in the Book, which would be researched, written and published with no conditions regarding what would be written or when it would be published.⁹ It was also noted that the Times did not pay anything for said access.¹⁰ HarperCollins had already reached apparently similar agreements with the Washington Post and Fox News, in which all three news outlets had been provided proofs of the Book as it neared completion, well before the meetings with the Senators, and were given "exclusives" to write about it, pursue their own investigations of the material in the Book, and, of course, to report whatever they saw fit.¹¹ Moreover, several other news organizations received briefings prior to publication, and apparently several entities and individuals obtained the Book, or significant portions of it well before the publication date.¹² The New York Times story referenced above was published on April 23, 2015, thereby making public the Book's claims regarding Mrs. Clinton and Russian uranium dealing, buttressed by the Times' own investigative reporting.¹³ Interestingly, on April 19, 2015, Amy Chozick of the New York Times published a story about

⁹ Sullivan, Margaret. "An 'Exclusive' Arrangement on a Clinton Book, and Many Questions." The New York Times. 23 April 2015. Web. 2 July 2015. < http://publiceditor.blogs.nytimes.com/2015/04/23/an-exclusive-arrangement-on-a-clinton-book-and-many-questions/?_r=0>.

¹⁰ Id.

¹¹ Id.

¹² Id.

¹³ Id.

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the Book which she had apparently obtained independently.¹⁴ Thus, weeks before the publication date of the Book, media outlets were reporting on the contents of the Book making its substance fodder for public discourse. The above demonstrates that in ways large and small, purposeful and not, much of the content of the allegations in the Book was put into the public sphere before the actual publication of the Book, thereby further undermining the notion that any information shared with Senator Paul prior to the publication date could be a campaign contribution valued at thousands of dollars.

In *Citizens United v. FEC*, 558 U.S. 310, 349 (2010), the Supreme Court opined that it would be troubling if the media exception to the Federal Election Law contribution rules was not applicable to the publication of books. The Explanation and Justification for the Regulations on Internet Communications, at 71 Fed. Reg. 8589, 18608-09 (April 12, 2006), noted, "The Commission is also clarifying that the media exemption protects news stories, commentaries, and editorials no matter in what medium they are published." It goes on to explain, "As the Supreme Court noted, 'It is not the intent of Congress in [FECA]***to limit or burden in any way the First Amendment freedoms of the press and association. Thus, the exclusion assures the unfettered right of newspapers, TV networks, and other media to cover and comment on political campaigns.' Massachusetts Citizens for Life, 479 U.S. at 250 (citing H.R. Rep. No. 93-129 at 4

¹⁴ Chozick, Amy. "New Book, 'Clinton Cash,' Questions Foreign Donations to Foundation." The New York Times. 19 April 2015. Web. 2 July 2015. < <http://www.nytimes.com/2015/04/20/us/politics/new-book-clinton-cash-questions-foreign-donations-to-foundation.html> >.

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(1979)" And, recently, in Advisory Opinion 2008-14 (Melothe Inc.) at 3, the Commission stated: "Commission has not limited the press exemption to traditional news outlets, but rather has applied it to 'news stories, commentaries, and editorials, no matter in what medium they are published."

Advisory Opinion 2014-06 (Ryan) goes into great detail about the sale and promotion of a book written by Congressman and candidate Paul Ryan. Rather than directly state that the publication of a book is subject to the media exception, the Commission determined that a corporation's (the publisher's) bona fide commercial activity is neither "for the purpose of influencing any election for federal office" or "in connections with any election" and thus is not a contribution or otherwise subject to regulation under the Act." It further noted that the publisher for Ryan's book, like HarperCollins, is a long established and prominent publisher of a wide variety of different types of books, engaged in genuine commercial activity on their face. Interestingly, in a concurring statement to that Opinion, signed by three of the FEC Commissioners, they stated, "The publication of books is a centuries-old medium for disseminating political and social commentary. The Supreme Court long has recognized that book publishers and books fall squarely within the Free Press Clause of the First Amendment; the constitutional guarantee of freedom of the press embraces the circulation of books as well as their publication." (*Bantam Books, Inc. v. Sullivan*, 372 U.S. 58, 64 n.6 (1963) (citing *Lovell v. Griffin*, 303 U.S. 444, 452 (1938)) Moreover, it is well established that promotional activities

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are exempt when performed in support of exempt media publications. See for example Advisory Opinion 2010-08 (Citizens United); Advisory Opinion 2014-06 (Ryan); and Advisory Opinion 2011-11 (Colbert).

If Mr. Schweizer's visit to Senator Paul is looked at in the context of promoting the Book, it must be recognized as being within the media exception, and/or permissible commercial activity, for which no payment was received by Mr. Schweitzer, nor contribution given to Mr. Paul.

Conclusion

In conclusion, we suggest the Commission should fully recognize Mr. Schweizer's visit to Senator Paul was not a campaign contribution but was simply a citizen doing his civic duty by sharing information with an appropriate government official about possible malfeasance by a former official. And, that as a matter of law there could be no campaign contribution to a candidate, when such person was neither a candidate nor engaged with an authorized campaign committee. Failing that, should you find Senator Paul was a candidate, and then you must consider Mr. Schweizer's visit to him and his sharing information as garden variety voluntary assistance to a candidate, which would not constitute a campaign contribution, nor would the uncompensated promotion of a published book.


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For the foregoing reasons, the Commission should take no further action against Peter Schweizer and should forthwith dismiss the Complaint which has no basis in law or in fact.

Sincerely,

Sincerely,



Laurence A. Levy

07/06/2014 14:00:11

EXHIBIT 2

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

NOTE: This designation should be filed with the appropriate office listed in the instructions.

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

(Including Joint Fundraising Representatives)

NOTE: This designation should be filed with the principal campaign committee.

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to penalties of 2 U.S.C. §437g.

FEC FORM 3 (REV. 02/2008)

**FEC
FORM 1****STATEMENT OF
ORGANIZATION**

Office Use Only

1. NAME OF
COMMITTEE (In full)(Check if name
is changed)Example: If typing, type
over the lines.

12FB4M5

Rand Paul for President, Inc.

ADDRESS (number and street)

PO Box 77681

(Check if address
is changed)

Washington

CITY ▲

DC

STATE ▲

20013

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

(Check if address
is changed)

paul@pdscompliance.com

Optional Second E-Mail Address

megan@pdscompliance.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

(Check if address
is changed)

www.randpaul.com

2. DATE

04

07

2015

3. FEC IDENTIFICATION NUMBER ►

C 00575449

4. IS THIS STATEMENT

X

NEW (N)

OR

AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Paul Kilgore

Signature of Treasurer

Paul Kilgore

(Electronically Filed)

Date

04

07

2015

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.
ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.Office
Use
OnlyFor further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100**FEC FORM 1**
(Revised 06/2012)

5. TYPE OF COMMITTEE

Candidate Committee:

- (a) ☒ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate

Rand Paul

Candidate Party Affiliation

REP

Office Sought:

House

Senate

☒ President

State

District

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate

Party Committee:

- (d) ☐ This committee is a _____ (National, State or subordinate) committee of the _____ (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

Corporation

Corporation w/o Capital Stock

Labor Organization

Membership Organization

Trade Association

Cooperative

In addition, this committee is a Lobbyist/Registrant PAC.

- (f) ☐ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

In addition, this committee is a Lobbyist/Registrant PAC.

In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

- (g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1. _____ FEC ID number C
2. _____ FEC ID number C
3. _____ FEC ID number C
4. _____ FEC ID number C

1308460610

Write or Type Committee Name

Rand Paul for President, Inc.

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

RAND PAUL VICTORY COMMITTEE

Mailing Address

PO BOX 72190

NEWPORT

KY

41072

CITY

STATE

ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☒ Joint Fundraising Representative ☐ Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

Paul Kilgore

Mailing Address

2470 Daniels Bridge Rd Ste 121

Athens

GA

30606

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

706

534

7780

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name
of Treasurer

Paul Kilgore

Mailing Address

2470 Daniels Bridge Rd Ste 121

Athens

GA

30606

Title or Position
Treasurer

CITY

STATE

ZIP CODE

Telephone number

706

534

7780

Full Name of
Designated
Agent

Megan Brown

Mailing Address

2470 Daniels Bridge Rd Ste 121

Athens

CITY

GA

STATE

30608

ZIP CODE

Title or Position

Assistant Treasurer

Telephone number

708

534

7780

9. Banks or Other Depositories; List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety-deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Chainbridge Bank

Mailing Address:

1445-A Laughlin Ave

McLean

CITY

VA

STATE

22101

ZIP CODE

Name of Bank, Depository, etc.

United Bank

Mailing Address

1219 Mt Aetna Rd

Hagerstown

CITY

MD

STATE

21742

ZIP CODE

15951112948-1

2000091440511

EXHIBIT 3

RECEIVED
FEC MAIL CENTER

1. (a) Name of Candidate (in full) Hillary Rodham Clinton		2015 APR 13 AM 9:03	
(b) Address (number and street) P.O. Box 5256		<input type="checkbox"/> Check if address changed	
(c) City, State, and ZIP Code New York, NY 10185-5256		2. Identification Number P00003392	
4. Party Affiliation Democrat		3. Is This Statement <input checked="" type="checkbox"/> New (N) OR <input type="checkbox"/> Amended (A)	
5. Office Sought President		6. State & District of Candidate	

7. I hereby designate the following named political committee as my Principal Campaign Committee for the 2016 election(s).
(year of election)

(a) Name of Committee (in full)
Hillary for America

(b) Address (number and street)
P.O. Box 5256

(c) City, State, and ZIP Code
New York, NY 10185-5256

8. I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my candidacy.

(a) Name of Committee (in full)

(b) Address (number and street)

(c) City, State, and ZIP Code

Signature of Candidate <i>Hillary Rodham Clinton</i>	Date April 13, 2015
---	------------------------

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to penalties of 2 U.S.C. §437g.

[illegible]

FEC
FORM 1

STATEMENT OF
ORGANIZATION

RECEIVED
FEC MAIL CENTER
2015 APR 13 AM 9:03

Office Use Only

1. NAME OF
COMMITTEE (in full)

☐

(Check if name
is changed)

Example: If typing, type
over the lines.

12FE4M5

Hillary for America

ADDRESS (number and street)

P.O. Box 5256

☐

(Check if address
is changed)

New York

NY

10185

5256

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

☐

(Check if address
is changed)

fec@hillaryclinton.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐

(Check if address
is changed)

hillaryclinton.com

2. DATE

04

13

2015

3. FEC IDENTIFICATION NUMBER

C

4. IS THIS STATEMENT

☒

NEW (N)

OR

☐

AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Jose H. Villarreal

Signature of Treasurer

Jose H. Villarreal

Date

04

13

2015

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office
Use
Only

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 02/2009)

5. TYPE OF COMMITTEE

Candidate Committee:

- (a) ☒ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate

Hillary Rodham Clinton

Candidate Party Affiliation

Dem

Office Sought:

☐ House☐ Senate☒ President

State

District

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate

Party Committee:

- (d) ☐ This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:
- ☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization
- ☐ Membership Organization ☐ Trade Association ☐ Cooperative
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- (f) ☐ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- ☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

- (g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

- | | | | |
|----|----------------------|---------------|----------------------|
| 1. | <input type="text"/> | FEC ID number | <input type="text"/> |
| 2. | <input type="text"/> | FEC ID number | <input type="text"/> |
| 3. | <input type="text"/> | FEC ID number | <input type="text"/> |
| 4. | <input type="text"/> | FEC ID number | <input type="text"/> |

Write or Type Committee Name

Hillary for America

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

None

Mailing Address

CITY

STATE

ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

Elizabeth Jones

Mailing Address

P.O. Box 5256

New York

NY

10185 - 5256

Title or Position

CITY

STATE

ZIP CODE

COO

Telephone number

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name
of Treasurer

Jose H. Villarreal

Mailing Address

P.O. Box 5256

New York

NY

10185 - 5256

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

Full Name of
Designated
Agent

Shelly Moskwa

Mailing Address

P.O. Box 5256

New York

CITY

NY

STATE

10185

ZIP CODE

-5256

Title or Position

Assistant Treasurer

Telephone number

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Amalgamated Bank

Mailing Address

275 Seventh Avenue

New York

CITY

NY

STATE

10003

ZIP CODE

Name of Bank, Depository, etc.

Bank of America

Mailing Address

1001 Pennsylvania Avenue NW

Washington

CITY

DC

STATE

20004

ZIP CODE

CONFIDENTIAL

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt 4/13/15
<input type="checkbox"/> USPS First Class Mail	Postmarked Date of Receipt
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
<input type="checkbox"/> USPS Priority Mail Express	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
	Next Business Day Delivery <input type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
PREPARER (3/2015)	DATE PREPARED 4/13/15