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February 12, 2016

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BY HAND DELIVERY

MUR # 7011

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RECEIVED
FEDERAL ELECTION
COMMISSION
2016 FEB 16 AM 11:19
OFFICE OF GENERAL
COUNSEL

Re: Fraudulent Website - HC4president.org

Messrs Hulser and Petalas:

We are counsel to Hillary for America, Inc. ("Hillary for America"), the principal campaign committee of Secretary Hillary Clinton, a candidate for the Democratic Party's nomination for President of the United States. It has recently come to our attention that someone is fraudulently soliciting and collecting online contributions and falsely and fraudulently claiming it is authorized by Secretary Clinton or Hillary for America.

On February 4, 2016, a supporter of Secretary Clinton who was watching the Democratic Presidential Debate taking place that evening attempted to make a contribution to Hillary for America to support Secretary Clinton's candidacy. The supporter instead was directed to the website of an unauthorized committee claiming to support Secretary Clinton—HC4President. HC4President registered with the Federal Election Commission ("FEC") on January 19, 2016 as an unauthorized presidential committee supporting Secretary Clinton. FEC Committee ID: C00605204. HC4President's website claims that the group is "[f]irst and foremost . . . a group of huge Hillary Clinton supporters" whose goal is to "help Hillary Clinton become the 45th President and first woman elected to the office." See Attachment A. The pages throughout HC4President's website contain a header with a stylized "HC" logo above text reading "Committee to Elect Hillary Clinton" See Attachment B. HC4President's donation page says that a contribution to the committee will go "directly toward[s] training volunteers to knock on doors, make phone calls and spread the word about Hillary's movement" among other purposes. See *id.* After choosing a contribution amount, a would be contributor is forwarded to a PayPal page with the subject line "Donation to Hillary Clinton Campaign" where they are prompted to fill in their payment information. See Attachment C.

However, when Secretary Clinton's supporter took these steps and submitted her contribution she received a reply email from info@feelbern.org ("feelbern.org") thanking her for her "donation to Feel

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the Bern” and noting that “[t]he campaign to elect Bernie Sanders depends on individual donations from people like you.” *See* Attachment D.

Like HC4President, feelbern.org also describes itself as “[f]irst and foremost . . . a group of big Bernie Sanders fans” and contains a logo that says “Feel the Bern” above text reading “Committee to Elect Bernie Sanders.” *See* Attachment E. The website’s disclaimer states that the page is “[p]aid for by the Feel The Bern Committee (www.feelbern.org) and not authorized by any candidate or candidate’s committee.” *Id.* However, the FEC’s online database of registered committees does not list a committee operating under the name Feel the Bern Committee.

HC4President is not, as it claims on its webpage, the “Committee to Elect Hillary Clinton” nor is a contribution using the PayPal page used by HC4President a “Donation to [the] Hillary Clinton Campaign.” Additionally, it is not surprising that the supporter who wished to contribute to Secretary Clinton’s campaign was directed to the HC4President webpage as at the time the supporter made her contribution a person searching on Google for “donate Hillary Clinton for President” or “donate to Hillary Clinton” would see the HC4President webpage as the first and second potential links in the Google search results with the description “Make History - Support Hillary Clinton for President by donating today.” *See* Attachments F, G. Further, even if an eligible contributor wished to make a contribution to HC4President using their website they will receive a reply email thanking them for their “donation to Feel the Bern” from feelbern.org—a website that claims to be paid for by the unregistered Feel The Bern Committee—instead of the intended HC4President committee.

Based on these facts, it appears that HC4President is a scam that is also fraudulently misrepresenting itself as acting on behalf of Hillary for America for the purpose of soliciting contributions in violation of federal law. *See* 52 U.S.C. § 30124. HC4President’s fraudulent scheme appears to also include feelbern.org and the unregistered and likely nonexistent Feel The Bern Committee. We respectfully request that you undertake an immediate investigation of this matter, and promptly take steps to seek appropriate judicial relief to prevent future harm to our client. Please do not hesitate to contact us if you have any questions or need further information.

Sincerely,

SUBSCRIBED AND SWORN to before me this 12th day of February, 2016.


Notary Public

My Commission Expires:

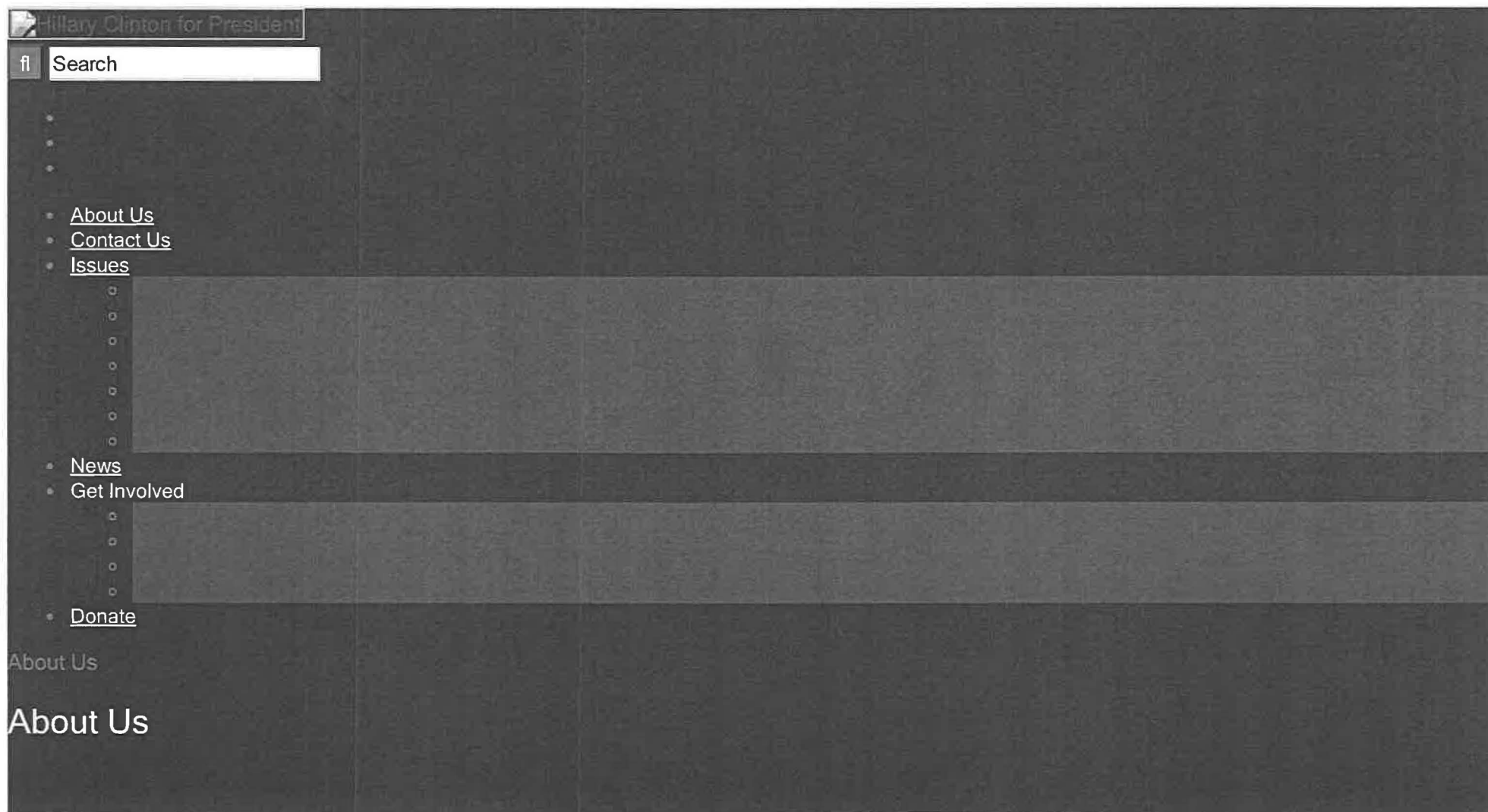


ATTACHMENT A

This is Google's cache of <http://hc4president.org/about-us/>. It is a snapshot of the page as it appeared on Jan 24, 2016 15:17:28 GMT. The current page could have changed in the meantime. [Learn more](#)

Full version Text-only version View source

Tip: To quickly find your search term on this page, press **Ctrl+F** or **⌘-F** (Mac) and use the find bar.



First and foremost, we are a group of huge Hillary Clinton supporters. We have been following her career for years, and feel that she has the experience and expertise to bring the country forward for the majority of Americans. Her strong and consistent stance on the important issues, and her lifelong commitment to the working and middle class, has made the idea of a Hillary Clinton presidency a cause we are passionate about helping.

We come from all walks of life and backgrounds, including construction workers, IT professionals, teachers, doctors, retired law enforcement & many others.

We are not billionaires looking to buy votes for our own pet projects, we genuinely believe that Hillary Clinton has the majority of Americans as his first priority.

Volunteers have donated their time and money to build this website, creating advertising content, buying advertising space, and voter drive initiatives. Our hope is to raise enough money to make a significant positive impact on Hillary's campaign and to get the word out about her campaign platform and initiatives. HC4President!

What We Do

Spreading the word about Hillary Clinton's presidential campaign platform is our top priority. Educating voters who don't know about Hillary's platform, or even where to vote in the primaries and general election, are essential to build grassroots support for Hillary's campaign.

We educate voters about why Hillary Clinton has their best interest in mind, and why her policies help the middle and working classes, not billionaires and crooked politicians. Voter turnout is arguably the most important part of any campaign, so educating our supporters on where and how to vote is crucial to win both the general election and Democratic primary.

"The challenges of change are always hard. It is important that we begin to unpack those challenges that confront this nation and realize that we each have a role that requires us to change and become more responsible for shaping our own future." - Hillary Clinton

We use online media, TV and radio advertising to educate the public on Hillary Clinton's experience and stances on the issues. Encouraging people to vote in primaries and general election by leveraging online media, TV and radio advertising is a key to increasing voter turnout and positive word-of-mouth about Hillary.

Our volunteers' backgrounds in design, online and TV/radio advertising allow us to create great messaging and distribute to the correct audiences at the lowest possible cost.

Our Goals

Our ultimate goal is to help Hillary Clinton become the 45th President and first woman elected to the office. To accomplish that goal, we are focused on the following key elements that can most help her campaign:

- Raise awareness on Hillary Clinton's platform on the issues, how to vote for Hillary Clinton, and other opportunities to assist the campaign effort.
- Target key geographic and demographic segments of voters with media and word-of-mouth campaigns to gain support in battleground states and

voting districts.

- Significantly increase the number of people who vote in the Democratic primaries for Hillary Clinton.
- Donate directly to other volunteer groups that support Hillary in battleground and other areas.

Support Hillary Today And Stand With The Middle Class

Donate today to help Hillary Clinton become our nation's 45th President.

[Donate Now](#)

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ATTACHMENT B


[About Us](#)
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Your contribution goes directly toward paying for training volunteers to knock on doors, make phone calls and spread the word about Hillary's movement. It also helps pay for our initiatives to help voters obtain the appropriate ID and transportation to voting facilities. With your help we can take back our country.

Select Amount

\$10

\$35

\$50

\$100

\$250

\$500

\$1000

Enter Your Amount (in \$)

☐ Make It A Monthly

Donation

[Donate Now](#)

✓ Donation Rules and Agreement

Your contribution will be used in connection with a federal election.

Your contribution is not tax deductible for federal and/or state income tax purposes.

Contributions are limited to \$5000 per individual per calendar under federal law.

By Making A Donation, You Agree To The Following:

- This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.
- I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
- I am not a federal contractor.
- I am at least eighteen years old.
- I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).

i

Federal law prevents us from accepting contributions from a foreign national who lacks permanent resident status in the USA, a Federal government contractor, corporations, labor organizations or general treasury funds of national banks. Federal law also prevents any person from contributing another person's funds.

ATTACHMENT C

HC4President

Donation to Hillary Clinton Campaign**Total: \$50.00 USD****Pay with Credit Card or Log In****PayPal**  **Secure Payments**Country: ▼First Name: Last Name: Credit Card Number:

Payment type:

Expiration Date: / CSC: [What's this?](#)Billing Address Line 1: Billing Address Line 2:
(optional) City: State: ZIP code: Home Telephone: Email: **ALREADY HAVE A
PAYPAL ACCOUNT?**Email: Password: [Forgot your email address or password?](#)

PayPal protects your privacy and security.
For more information, read our [User Agreement](#) and [Privacy Policy](#).

ATTACHMENT D



Dear Friend,

Thank you for your donation to Feel the Bern! Your generosity is very much appreciated. The campaign to elect Bernie Sanders depends on individual donations from people like you. We must compete with super PACs and billionaires, so every single dollar helps.

Please like Feel the Bern on Facebook to get the latest from the campaign: <https://www.facebook.com/feelbern/>

We cannot thank you enough for your contribution to this campaign. Thank you for your support.

Thanks so much! Together we can do this!

Team Bern

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You are receiving this email because you opted in at our website "<http://www.feelbern.org>". "Join the movement today and take part in history. We have the people, and there is nothing we can't accomplish together."

Our mailing address is:

LRQ LLC
30600 Telegraph Rd.
Suite 2345
Bingham Farms, MI 48025

[Add us to your address book](#)

Want to change how you receive these emails?
You can [update your preferences](#) or [unsubscribe from this list](#)



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ATTACHMENT E


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About us



First and foremost, we are a group of big Bernie Sanders fans. For many reasons which are shared by millions of other Americans, Bernie's message has struck a chord in our minds and hearts. His consistent stance on the important issues, and his lifelong fight to better the lives of working and middle class Americans, has made the prospect of a Bernie Sanders presidency a cause we are passionate about helping.

We are a group volunteers that come from all walks of life & professions, including construction workers, IT professionals, attorneys, teachers, retired law enforcement & many others. We are not billionaires looking to buy votes for personal projects, we genuinely believe that Bernie Sanders has the majority of Americans as his first priority.

We have donated our time and money to build this website, creating advertising content, buying advertising space, and voter drive initiatives. We hope that we can raise enough money to make a significant positive impact on Bernie's campaign.

Believe in the Bern!

What We Do

Spreading the word about Bernie Sanders' presidential campaign platform, and how to vote for Bernie Sanders are our top priorities.

We educate voters about why Bernie Sanders' has their best interest at heart, and why his policies help the middle and working classes, not billionaires and crooked politicians. Voter turnout is arguably the most important part of any campaign, so educating our supporters on where and how to vote is crucial to win both the general election and Democratic primary.

“ In my view, Democrats will not retain the White House, will not regain the Senate, will not gain the House and will not be successful in dozens of governor's races unless we run a campaign which generates excitement and momentum and which produces a huge voter turnout.”

– Bernie Sanders

We utilize online media, TV and radio advertising to highlight Bernie Sanders' experience and stances on the issues. Encouraging people to vote in primaries and general election by

utilizing online media, TV and radio advertising is a key to driving voter turnout and positive word-of-mouth about Bernie.

Our volunteers' backgrounds in design, online and TV/radio advertising allow us to create great messaging and distribute to the correct audiences at the lowest possible cost.

Our Goals

Our ultimate goal is to make a meaningful positive impact on Bernie Sanders' campaign for President. To accomplish that goal, we are focused on the following key elements that can most help the campaign:

- Raise awareness on Bernie Sanders' stance on the issues, how to vote for Bernie Sanders, and other opportunities to assist the campaign effort.
- Significantly increase the number of people who vote in the Democratic primaries for Bernie Sanders.
- Target key geographic and demographic segments of voters with media and word-of-mouth campaigns to gain support in battleground states and voting districts.
- Donate directly to other volunteer groups that support Bernie in battleground areas, on a limited basis.



Share your love for Bernie, Share it with your friends.



With your help, we can elect Bernie Sanders as the 45th President of the United States of America.

 DONATE NOW

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ATTACHMENT F



donate hillary clinton for president



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Donate to Hillary Clinton - hc4president.org

 www.hc4president.org/ ▼

Make History - Support **Hillary** for President by donating today

Donate - Hillary Clinton

<https://www.hillaryclinton.com/contribute/donate/> ▼

Please make this a recurring contribution By clicking **donate**, you acknowledge that you are making a recurring contribution to **Hillary** for America, and that the amount selected will be charged to your credit card immediately and on this date every month during the campaign.

Hillary Clinton

<https://www.hillaryclinton.com/> ▼

Official campaign site of Hillary for America. **Hillary Clinton** wants to be a champion for everyday Americans - so she's a candidate for **president** in 2016.

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Hillary Clinton

on Google



ATTACHMENT G



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HillaryClinton.com - Hillary Campaign Website

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Donate today to help grow the Hillary Victory Fund.

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Sign Up Today

Join Hillary Clinton's official

campaign and sign up today!

Volunteer

Sign up to volunteer and join

Hillary for President!

Donate to Hillary Clinton - hc4president.org

 www.hc4president.org/ ▾

Make History - Support Hillary for President by donating today

Bernie for President - berniesanders.com

 www.berniesanders.com/ ▾

Bernie's campaign is being funded by ordinary Americans. Join us.

Reform Wall Street — Contribute — Volunteer for Bernie — Sign Up

Donate - Hillary Clinton

<https://www.hillaryclinton.com/contribute/donate/> ▾

Please make this a recurring contribution By clicking donate, you acknowledge that you are making a recurring contribution to Hillary for America, and that the amount selected will be charged to your credit card immediately and on this date every month during the campaign.

Hillary Clinton

<https://www.hillaryclinton.com/> ▾

Official campaign site of Hillary for America. Hillary Clinton wants to be a champion for everyday Americans - so she's a candidate for president in 2016.

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