June 10, 2015

The Honorable John A. Koskinen
Commissioner
Internal Revenue Service
1111 Constitution Ave., N.W.
Washington, DC 20224

By facsimile (without exhibits) (202) 622-5756 and first class mail

Re: Request for Examination of the National Rifle Association of America

Dear Commissioner Koskinen:

Citizens for Responsibility and Ethics in Washington ("CREW") respectfully requests the Internal Revenue Service ("IRS") commence an examination of the National Rifle Association of America ("NRA"), a non-profit organization exempt from taxation pursuant to section 501(c)(4) of the Internal Revenue Code ("tax code"), to determine if it violated federal law by failing to disclose more than $33.5 million the NRA spent on political activity between 2008 and 2013.¹

The NRA’s Structure

The NRA is a membership organization with a variety of internal divisions, subsidiaries, and related organizations.² The NRA appears to conduct its political activity through two entities. The National Rifle Association of America Political Victory Fund ("NRA-PVF") is the NRA’s separate segregated fund that serves as its political action committee and is organized under section 527 of the tax code.³ As a separate segregated fund, NRA-PVF is treated as a separate organization from the NRA and does not report its activities on the NRA’s tax returns.⁴

The National Rifle Association Institute for Legislative Action ("NRA-ILA") is an internal division of the NRA, and represents itself as the "lobbying arm of the NRA."⁵ As a result, NRA-ILA’s activities are reported on the NRA’s Form 990 tax returns.⁶

¹ CREW submits this letter in lieu of Form 13909; a copy is being sent to the Dallas office. These apparent violations were first raised in a news report published by Yahoo News. Alan Berlow, The NRA’s Brazen Shell Game With Donations, Yahoo News, April 21, 2015, attached as Exhibit A and available at https://www.yahoo.com/politics/the-nras-deceptive-shell-game-with-donations-a-116744915796.html.
² NRA 2012 Form 990, Schedule O (excerpts attached as Exhibit B).
⁵ NRA website, About the NRA Institute for Legislative Action page, available at https://www.nraila.org/about/.
⁶ See, e.g., NRA 2012 Form 990, Part III, Line 4c (reporting more than $17 million in NRA-ILA program services); id. at Part VII (listing NRA-ILA officials as NRA officers and employees); id. at Schedule R (not listing NRA-ILA as a related tax-exempt organization).
The NRA’s Political Activity

The Federal Election Campaign Act ("FECA") and Federal Election Commission ("FEC") regulations require any person making an independent expenditure to disclose the expenditure to the FEC in periodic reports. Independent expenditures are defined as expenditures "expressly advocating the election or defeat of a clearly identified candidate." In reports signed under penalty of perjury by NRA-ILA’s fiscal officer, the organization reported to the FEC it made $7,448,385 in independent expenditures in 2012. More than half of those independent expenditures were spent opposing Barack Obama or supporting Mitt Romney in the presidential race.

The FECA and FEC regulations further require any membership organization that makes communications to its members expressly advocating the election or defeat of a candidate to disclose those expenditures to the FEC in periodic reports. In reports signed under penalty of perjury by NRA-ILA’s fiscal officer, the organization reported to the FEC spending $1,222,353 in communication costs for 2008, $1,089,438 for the 2010 election cycle, $1,159,929 for the 2012 election cycle, and $39,705 for 2013.

In total, between 2008 and 2013 NRA-ILA reported to the FEC under penalty of perjury making $10,959,810 in expenditures expressly advocating the election or defeat of candidates for federal office.

The NRA made further political expenditures by paying for the fundraising and administrative costs of NRA-PVF, its political action committee. The NRA’s annual financial statements for 2008-2013, prepared by independent auditors for the NRA’s board of directors, disclosed the NRA pays NRA-PVF’s fundraising and administrative expenses. The NRA paid $4,376,378 for the fundraising and administration of its political action committee in 2008, $3,759,979 for these costs in 2009, $5,359,183 in 2010, $569,996 in 2011, $4,970,338 in 2012, and $3,512,405 in 2013. In total, the NRA spent $22,548,279 on these expenses for its political action committee during those six years.

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7 2 U.S.C. § 434(c), (g); 11 C.F.R. §§ 104.4(e)-(f), 109.10(b)-(d).
8 2 U.S.C. § 431(17); 11 C.F.R. § 100.16.
11 52 U.S.C. § 301019(B)(iii); 11 C.F.R. §§ 100.134(a), 104.6, 114.3.
13 The NRA-ILA or other parts of the NRA also may have engaged in state or local political activity.
14 McGladey & Pullen, LLP, National Rifle Association of America, Financial Statements as of December 31, 2009 and 2008 and Report Thereon (excerpts attached as Exhibit C); McGladey & Pullen, LLP, National Rifle Association of America, Financial Statements as of December 31, 2011 and 2010 and Report Thereon (excerpts
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Between the expenditures expressly advocating the election or defeat of candidates for federal office the NRA disclosed to the FEC, and paying the fundraising and administrative expenses of its PAC, the NRA spent at least $33,508,089 on political campaign activities from 2008 and 2013.

The NRA’s Representations to the IRS

Despite these representations to the FEC and in its annual financial statements, the NRA told the IRS – also under penalty of perjury – that it spent nothing on political campaign activities between 2008 and 2013.

As a section 501(c)(4) tax-exempt organization, the NRA is required to file annual Form 990 tax returns. Tax-exempt organizations engaged in any “direct or indirect political campaign activities on behalf of or in opposition to candidates for public office” must both acknowledge conducting these activities on their tax returns and file a Schedule C describing the political activities and disclosing the amount spent on them. “Political campaign activities” are defined as “all activities that support or oppose candidates for elective federal, state, or local public office.” When an advertisement explicitly advocates the election or defeat of an individual for public office, the expenditure is direct political campaign activity. Indirect activities include payments for the administrative and fundraising costs of a political action committee and costs for communications to a group’s members that expressly advocate the election or defeat of a candidate.

The NRA filed Form 990 tax returns for each of the years 2008, 2009, 2010, 2011, 2012, and 2013. The NRA’s treasurer and chief financial officer, Wilson H. Phillips, Jr., signed each of the tax returns under penalty of perjury. The NRA represented on each of the tax returns it did not engage in any “direct or indirect political activities,” and did not file a Schedule C disclosing its political expenditures for any of these years.

The NRA’s tax returns are prepared and/or reviewed by an accounting firm that describes itself as “a leading provider of . . . tax and consulting services.” After the NRA’s tax return is

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attached as Exhibit D); McGladrey & Pullen, LLP, National Rifle Association of America, Financial Statements as of December 31, 2012 and 2012 and Report Thereon (excerpts attached as Exhibit E).

15 Form 990, Part IV, Question 3; 2014 Instructions for Form 990, at 12; 2014 Instructions for Schedule C, at 1, 3.

16 2014 Instructions for Form 990, at 64.


18 Treas. Reg. § 1.527-2(c)(2).

19 NRA 2008 Form 990 (excerpts attached as Exhibit F); NRA 2009 Form 990 (excerpts attached as Exhibit G); NRA 2010 Form 990 (excerpts attached as Exhibit H); NRA 2011 Form 990 (excerpts attached as Exhibit I); NRA 2012 Form 990; NRA 2013 Form 990 (excerpts attached as Exhibit J) (collectively, “NRA 990 tax returns”).

20 NRA 990 tax returns, Part II.

21 Id., Part IV, Question 3.

22 Id., Part II; Part VI, Section B; and Schedule O; McGladrey LLP website, Who We Are page, available at http://mcgladrey.com/content/mcgladrey/en_US/who-we-are.html.
prepared and reviewed, the NRA Board Audit Committee reviews it before it is filed with the IRS.

In April 2015, Yahoo News published a report describing the NRA’s political activities and its representations to the IRS. The NRA subsequently provided Yahoo News with a response. According to the updated report, the NRA confirmed it failed to report its political expenditures for 2008 through 2013, but claimed this was the result of a “clerical error.” The NRA further contended that while “a box was erroneously left unchecked . . . the assertion that this represents fraud on the NRA’s part is absurd, as is the suggestion that the NRA would file publicly-available documents that deliberately attempt to conceal any of our activities.” In the updated report, however, the NRA did not address its failure to file any Schedule Cs, and did not assert it has or intends to amend its Form 990 tax returns. The NRA’s explanation also strains credibility. The NRA is a sophisticated entity that only filed its tax returns after multiple layers of internal and external review, making it difficult to believe a clerical error is responsible for the NRA’s failure to report its political expenditures for at least six years.

Violations

26 U.S.C. § 6652

Under the tax code, a tax-exempt organization that, without reasonable cause, fails to include any of the information required on a Form 990 tax return, or fails to provide the correct information, is liable for civil penalties. NRA-ILA’s independent expenditures and costs for communications to members that expressly advocated the election or defeat of candidates for public office are political expenditures the NRA should have reported on its Form 990 tax returns. Similarly, the NRA’s payment of NRA-PVF’s administrative and fundraising expenses are political expenditures the NRA should have reported on its Form 990 tax returns. Contrary to its assertion in response to the Yahoo News report, the NRA did not simply leave a box unchecked; it also failed to file a Schedule C with any of its Form 990 tax returns between 2008 and 2013. The NRA further has not asserted it has or intends to amend the tax returns it admitted are erroneous.

By failing to report the amount it spent on political campaign activities on its Form 990 tax returns for 2008, 2009, 2010, 2011, 2012, and 2013, and by failing to amend the erroneous tax returns, the NRA violated 26 U.S.C. § 6652 and should be subject to monetary penalties.

23 NRA 990 tax returns, Part VI, Section B, and Schedule O.
24 Berlow, Yahoo News, April 21, 2015.
25 Id. (“update” at conclusion of report).
27 Berlow, Yahoo News, April 21, 2015 (quoting Baker).
28 Id.
29 26 U.S.C. §§ 6652(c)(1)(A)(ii), 6652(c)(4); see also 2012 Instructions for Form 990, at 7.
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26 U.S.C. § 7206

Under the tax code, any person who "[w]illfully makes and subscribes any return, statement, or other document, which contains or is verified by a written declaration that it is made under the penalties of perjury, and which he does not believe to be true and correct as to every material matter," is guilty of a felony and subject to up to three years in prison and a fine of up to $100,000.\textsuperscript{30} The money spent on political campaign activities a tax-exempt organization reports to the IRS on its Schedule C is material for several reasons, including: (1) the amounts reported can be used by the IRS to determine whether the organization is complying with its tax-exempt status; (2) the amount an organization expended on section 527 exempt activities in part determines exempt function taxes the organization must pay; and (3) accurate public disclosure of the amount of political activity conducted by tax-exempt organizations is critical to the objective of transparency that underlies the reporting required on Form 990.\textsuperscript{31}

The NRA’s Form 990 tax returns for 2008, 2009, 2010, 2011, 2012, and 2013 were signed by the organization’s treasurer and chief financial officer under written declarations that each was made under penalty of perjury and that Mr. Phillips had examined the returns and each was true, correct, and complete to the best of his knowledge.\textsuperscript{32} As the NRA now admits, the tax returns were false and incorrect as to the material matter of the amount of money the NRA spent on political campaign activities in those tax years.

In response to the Yahoo News report, the NRA claimed the false and incorrect tax returns were the result of a clerical error and denied any concealment was deliberate. The NRA, however, is a large and sophisticated entity that regularly files complex tax and campaign finance documents. The NRA also uses a leading accounting firm to prepare and/or review its tax returns and to conduct annual audits of its financial records. Moreover, the audit committee of the NRA’s board reviewed all the tax returns before they were filed, and the NRA’s treasurer and chief financial officer signed each of the tax returns under penalty of perjury.

These facts undermine the NRA’s implausible contention that its false representations of its tax returns were the result of a clerical error. If the NRA instead voluntarily and intentionally filed false tax returns despite knowing its legal duties, it likely violated 26 U.S.C. § 7206.

18 U.S.C. § 1001

Federal law further prohibits anyone from “knowingly and willfully” making “any materially false, fictitious, or fraudulent statement or representation” in any matter within the jurisdiction of the executive, legislative, or judicial branch.\textsuperscript{33} The prohibition also includes anyone who “falsifies, conceals, or covers up by any trick, scheme, or device a material fact.”\textsuperscript{34}

\textsuperscript{30} 26 U.S.C. § 7206(1).
\textsuperscript{31} IRS, Background Paper, Summary of Form 990 Redesign Process, August 19, 2008, at 1.
\textsuperscript{32} NRA 990 tax returns, Part II.
\textsuperscript{33} 18 U.S.C. § 1001(a)(2).
\textsuperscript{34} 18 U.S.C. § 1001(a)(1).
Violations are punishable by up to five years in prison.\textsuperscript{35} As noted, the facts call into question the NRA’s contentions that the false representations in its tax returns were the result of a clerical error and not deliberate. If the NRA instead knowingly and willfully concealed or falsely stated the amount of political campaign activity on its Form 990 tax returns for 2008, 2009, 2010, 2011, 2012, and 2013, it likely violated 18 U.S.C. § 1001.

\textbf{Conclusion}

The NRA omitted more than $33.5 million in spending on political activities from its 2008-2013 tax returns. The IRS should commence an examination of the NRA and, should it find the NRA made false or incomplete statements on its tax returns, take appropriate action, including but not limited to referring this matter to the Department of Justice for prosecution. Only vigorous enforcement by the IRS will deter other organizations from violating our nation’s tax laws for political gain.

Thank you for your prompt attention to this matter.

Sincerely,

\begin{center}
Noah Bookbinder  
Executive Director  
Citizens for Responsibility and Ethics in Washington
\end{center}

Encls.

\textbf{cc:} IRS-EO Classification

\textsuperscript{35} 18 U.S.C. § 1001(a).
EXHIBIT B
The Honorable John A. Koskinen
Commissioner
Internal Revenue Service
1111 Constitution Ave., N.W.
Washington, DC 20224

By electronic mail (IRS.Commissioner@IRS.gov) and first class mail

Re: Supplement to Request for Examination of the National Rifle Association of America

Dear Commissioner Koskinen:

Citizens for Responsibility and Ethics in Washington ("CREW") writes to supplement its June 10, 2015 request that the Internal Revenue Service ("IRS") commence an examination of the National Rifle Association of America ("NRA"), a non-profit organization exempt from taxation pursuant to section 501(c)(4) of the Internal Revenue Code ("tax code").¹ As CREW explained in the initial complaint, the NRA appears to have violated federal law by failing to disclose more than $33.5 million it spent on political activity between 2008 and 2013. Despite being made aware of these omissions, the NRA’s most recent tax return, filed subsequent to CREW’s complaint, failed to disclose another $25 million the NRA spent on political activity in 2014. The NRA also does not appear to have corrected its 2008-2013 tax returns to date. In addition, further review of the NRA’s 2008-2013 tax returns shows the group appears to have made misrepresentations to the IRS about its spending on outside lobbyists, receipt of membership dues, and relationship with its political action committee, all of which appear to have been aimed at avoiding disclosure of its political and lobbying activity.² Accordingly, the IRS’s examination of the NRA should consider all of these issues.

The NRA’s Structure

CREW’s initial complaint explained that the NRA is a membership organization with a variety of internal divisions, subsidiaries, and related organizations that appears to conduct its political activity through two entities. The National Rifle Association of America Political Victory Fund ("NRA-PVF") is the NRA’s separate segregated fund that serves as its political action committee and is organized under section 527 of the tax code. As a separate segregated fund, NRA-PVF is treated as a separate organization from the NRA and does not report its

¹ CREW’s initial complaint, without exhibits, is attached as Exhibit A.
² These additional apparent violations were first raised in a news report in the New York Post. Isabel Vincent and Melissa Klein, There’s Something Funny About the NRA’s Tax Filings .... New York Post, January 3, 2016, (attached as Exhibit B and available at http://nypost.com/2016/01/03/years-of-nra-tax-filings-are-loaded-with-apparent-falsehoods/)
activities on the NRA’s annual Form 990 tax returns. The National Rifle Association Institute for Legislative Action (“NRA-ILA”) is an internal division of the NRA, and represents itself as the “lobbying arm of the NRA.” As a result, NRA-ILA’s activities are reported on the NRA’s tax returns.

The NRA’s 2014 Political Activity

The Federal Election Campaign Act (“FECA”) and Federal Election Commission (“FEC”) regulations require any person making an independent expenditure “expressly advocating the election or defeat of a clearly identified candidate” to disclose the expenditure in periodic reports. In reports signed under penalty of perjury by NRA-ILA’s fiscal officer, the organization reported to the FEC it made $11,508,211 in independent expenditures in 2014. The FECA and FEC regulations further require any membership organization that makes communications to its members expressly advocating the election or defeat of a candidate to disclose those expenditures to the FEC in periodic reports. In reports also signed under penalty of perjury, NRA-ILA reported spending $1,124,542 in communication costs in 2014. In total, the organization reported to the FEC making $12,632,753 in expenditures expressly advocating the election or defeat of candidates for federal office.

The NRA made further political expenditures by paying for the fundraising and administrative costs of NRA-PVF, its political action committee. The NRA’s annual financial statement for 2013 and 2014, prepared by independent auditors for the NRA’s board of directors, disclosed the NRA paid $18,548,482 of NRA-PVF’s fundraising and administrative expenses in 2014.

Between expenditures expressly advocating the election or defeat of candidates the NRA disclosed to the FEC and expenditures covering the fundraising and administrative expenses of its PAC, the NRA spent at least $31,181,235 on political campaign activities in 2014.

The NRA’s Representations to the IRS on its 2014 Tax Return

Despite those representations to the FEC and in its annual financial statement, the NRA told the IRS – also under penalty of perjury – that it spent only $5.79 million on political campaign activities in 2014.

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3 52 U.S.C. § 30104(c), (g); 11 C.F.R. §§ 104.4(e)-(f), 109.10(b)-(d).
5 52 U.S.C. § 30101(9)(B)(iii); 11 C.F.R. §§ 100.134(a), 104.6, 114.3.
7 McGladrey LLP, National Rifle Association of America, Financial Statements as of December 31, 2014 and 2013 and Report Thereon (excerpts attached as Exhibit C).
As a section 501(c)(4) tax-exempt organization, the NRA is required to file annual Form 990 tax returns. Tax-exempt organizations engaged in any “direct or indirect political campaign activities on behalf of or in opposition to candidates for public office” must both acknowledge conducting these activities on their tax returns and file a Schedule C describing the political activities and disclosing the amount spent on them.\(^8\) On Schedule C, tax-exempt organizations must disclose all spending on “direct and indirect political campaign activities,”\(^9\) defined as “[a]ll activities that support or oppose candidates for elective federal, state, or local public office.”\(^10\) When an advertisement explicitly advocates the election or defeat of an individual for public office, the expenditure is direct political campaign activity.\(^11\) Indirect activities include payments for the administrative and fundraising costs of a political action committee and costs for communications to a group’s members that expressly advocate the election or defeat of a candidate.\(^12\)

The NRA’s 2014 Schedule C, attached to its Form 990 tax return, disclosed $5,790,817 in spending on direct and indirect political campaign activities, approximately $25.4 million less than the $31.1 million the NRA actually spent on political activity.\(^13\) The $5.79 million reported is less than even the $11.5 million NRA-ILA reported to the FEC spending on express advocacy.

Schedule C also requires separate disclosure of the “amount directly expended by the filing organization for section 527 exempt function activities.”\(^14\) Exempt function activities include “all activities that are directly related to and support the process of influencing or attempting to influence the selection, nomination, election, or appointment of any individual to public office or office in a political organization.”\(^15\) For section 501(c)(4) organizations like the NRA, however, indirect exempt function expenses do not need to be reported.\(^16\) In this narrower category, the NRA oddly reported spending $13,342,588.\(^17\) It is unclear how the NRA calculated this amount, but it underscores that the NRA failed to disclose the actual amount it spent on political campaign activities. Even if this figure correctly reflects the NRA’s spending on section 527 exempt activities, the $5.79 million the NRA reported for political campaign activities clearly omitted millions of dollars it spent in 2014.

The NRA’s treasurer and chief financial officer, Wilson H. Phillips, Jr., signed the tax return under penalty of perjury.\(^18\) After the NRA’s tax return is prepared and reviewed by an

\(\text{Footnotes:}
\\begin{align*}
8 \text{Form 990, Part IV, Question 3; 2014 Instructions for Form 990, at 12; 2015 Instructions for Schedule C, at 1, 3.}\n9 \text{Form 990, Schedule C, Part I-A, Lines 1-2; 2015 Instructions for Schedule C, at 3.}\n10 \text{2014 Instructions for Form 990, at 64.}\n11 \text{Rev. Rul. 2004-06; see also Election Year Issues, 2002 EO CPE Text at 349, 388; Treas. Reg. § 1.527-2(c)(1).}\n12 \text{Treas. Reg. § 1.527-2(c)(2).}\n13 \text{NRA 2014 Form 990, Schedule C, Line 2 (excerpts attached as Exhibit D).}\n14 \text{Form 990, Schedule C, Part I-C, Line 1; 2015 Instructions for Schedule C, at 1.}\n15 \text{Treas. Reg. § 1.527-2(c)(1).}\n16 \text{Treas. Reg. § 1.527-6(b)(1)-(2).}\n17 \text{NRA 2014 Form 990, Schedule C, Part I-C, Lines 1, 3.}\n18 \text{Id., Part II.}\n\end{align*}\)
external auditing firm, the NRA Board Audit Committee reviews it, and it is presented to the full Board of Directors before being filed with the IRS.\textsuperscript{19}

**The NRA’s Representations to the IRS on its 2008-2013 Tax Returns**

CREW’s initial complaint explained that the NRA failed to disclose more than $33.5 million it spent on political activity between 2008 and 2013. As the complaint noted, the NRA confirmed it failed to report those political expenditures, but claimed this was the result of a “clerical error.”\textsuperscript{20} Despite this admission, the NRA does not appear to have amended any of its tax returns from 2008 to 2013 to correct these errors and disclose the amounts it spent on political activity in those years.

Further reviews of the NRA’s tax returns from 2008 through 2013 reveal several additional apparent misrepresentations.\textsuperscript{21} First, the NRA filed federal lobbying disclosures admitting to spending millions on outside lobbyists during those years, but told the IRS it did not spend any money on outside lobbyists. Tax-exempt organizations must provide on their tax returns a statement of functional expenses that discloses, among other things, fees paid to non-employees for a variety of services, including lobbying.\textsuperscript{22} On all of its 2008-2013 tax returns, the NRA asserted it spent no money at all on fees for outside lobbying.\textsuperscript{23} The Lobbying Disclosure Act (“LDA”) requires lobbying firms to register with the Clerk of the House of Representatives and the Secretary of Senate, disclose their clients, and report each quarter the amount they are paid by each client to lobby.\textsuperscript{24} Despite the NRA’s claims that it spent nothing on outside lobbying during 2008-2013, the LDA disclosures reported the NRA (including NRA-ILA) paid outside lobbyists $510,000 in 2008, $640,000 in 2009, $600,000 in 2010, $610,000 in 2011, $640,000 in 2012, and $640,000 in 2013.\textsuperscript{25}

Second, the NRA asserted in one part of its tax returns that it did not receive any membership dues, even though elsewhere in those returns it acknowledged receiving hundreds of millions of dollars in dues. One part of the Form 990 tax return asks a series of questions designed to establish whether the organization needs to file certain schedules. For example, one

\textsuperscript{19} *Id.*, Part VI, Section B, and Schedule O.
\textsuperscript{22} Form 990, Part IX, Line 11d.
\textsuperscript{23} NRA 2008 Form 990 (excerpts attached as Exhibit G); NRA 2009 Form 990 (excerpts attached as Exhibit H); NRA 2010 Form 990 (excerpts attached as Exhibit I); NRA 2011 Form 990 (excerpts attached as Exhibit J); NRA 2012 Form 990 (excerpts attached as Exhibit K); NRA 2013 Form 990 (excerpts attached as Exhibit L) (collectively, “NRA 990 tax returns”).
\textsuperscript{24} 2 U.S.C. §§ 1603, 1604.
question asks if the organization engaged in any political activity, and provides that if the answer is “yes,” the organization must file Schedule C and report that spending. As noted, the NRA answered “no” to this question for all of its 2008-2013 tax returns. Another question asks if the group is organized under sections 501(c)(4), 501(c)(5), or 501(c)(6) and received membership dues or assessments. If the organization answers “yes,” it also must file a Schedule C and answer questions about certain lobbying expenses.

In this section of its tax returns filed between 2008 and 2013, the NRA represented it did not receive membership dues or assessments and did not have to file a Schedule C. However, another part of Form 990 requires the filer to provide a statement of revenue disclosing the sources of its income. In this section of its 2008-2013 tax returns the NRA acknowledged receiving hundreds of millions of dollars in membership dues. For example, the NRA asserted it received more than $175 million in dues in 2013 and nearly $108 million in 2012. The NRA’s claim that it did not receive any membership dues in the other section of its tax returns appears to have been part of its effort to avoid filing a Schedule C for any of those years, which would have required the group to disclose more information about its political and lobbying spending.

Third, the NRA failed to disclose on its tax returns that its political action committee, NRA-PVF, was a related organization. Groups affiliated with other organizations must disclose those relationships on Schedule R of their tax returns. Between 2008 and 2013, however, the NRA did not identify NRA-PVF as a related tax-exempt organization on its Schedule R, despite elsewhere noting its existence in the NRA’s corporate structure.

Accordingly, it appears the NRA has not corrected its failure to disclose its political activity on its 2008-2013 tax returns, and those tax returns appear to include further misrepresentations about its lobbying activities, membership dues, and relationship with NRA-PVF.

**Violations**

26 U.S.C. § 6652

Under the tax code, a tax-exempt organization that, without reasonable cause, fails to include any of the information required on a Form 990 tax return, or fails to provide the correct

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26 Form 990, Part IV, Line 3.
27 Id., Line 5.
28 Id., Line 5 and Schedule C, Parts III-A, III-B.
29 NRA 990 Tax Returns, Part IV, Line 5. The language of this question was different in 2008 and 2009 than it has been from 2010 to the present. Based on the earlier version of the question, the NRA may have had a basis to argue that it could reasonably assert it had no membership dues for 2008 and 2009. For 2010-13, however, the new language of the question clearly should have resulted in the NRA answering “yes.”
30 Form 990, Part VIII, Lines 1b and 2.
31 NRA 990 Tax Returns, Part VIII, Lines 1b and 2.
32 Form 990, Part IV, Line 34 and Schedule R.
33 NRA 990 Tax Returns, Schedules O and R.
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information, is liable for civil penalties.\textsuperscript{34} The NRA should have reported on its 2014 Schedule C all of its spending on NRA-ILA’s independent expenditures and costs for communications to members that expressly advocated the election or defeat of candidates for public office, as well as its payment of NRA-PVF’s administrative and fundraising expenses. Instead of reporting the more than $31.1 million it spent on these direct and indirect political campaign activities, the NRA only reported spending $5.79 million. As a result, the NRA appears to have violated 26 U.S.C. § 6652 and should be subject to monetary penalties.

On its 2008-2013 tax returns, the NRA also failed to disclose its political campaign spending and does not appear to have corrected those returns. In addition, on those same returns, the NRA failed to report its spending on outside lobbyists, falsely asserted it did not receive any membership dues, and did not disclose its relationship with NRA-PVF. As all of this information must be provided on Form 990 tax returns, the NRA appears to have further violated 26 U.S.C. § 6652.

\textit{26 U.S.C. § 7206}

Under the tax code, any person who “[w]illfully makes and subscribes any return, statement, or other document, which contains or is verified by a written declaration that it is made under the penalties of perjury, and which he does not believe to be true and correct as to every material matter,” is guilty of a felony and subject to up to three years in prison and a fine of up to $100,000.\textsuperscript{35} The money spent on political campaign activities a tax-exempt organization reports to the IRS on its Schedule C is material for several reasons, including: (1) the amounts reported can be used by the IRS to determine whether the organization is complying with its tax-exempt status; (2) the amount an organization expended on section 527 exempt activities in part determines exempt function taxes the organization must pay; and (3) accurate public disclosure of the amount of political activity conducted by tax-exempt organizations is critical to the objective of transparency that underlies the reporting required on Form 990.\textsuperscript{36}

The NRA’s 2014 Form 990 tax return was signed by the organization’s treasurer and chief financial officer under a written declaration that it was made under penalty of perjury and that Mr. Phillips had examined the return and it was true, correct, and complete to the best of his knowledge.\textsuperscript{37} That tax return, however, was false and incorrect as to the material matter of the amount of money the NRA spent on political campaign activity in 2014.

The NRA filed its 2014 tax return after Yahoo News reported the NRA failed to disclose its political spending in its 2008-2013 tax returns, after CREW filed its initial complaint, and after the NRA claimed the false and incorrect tax returns were the result of a clerical error. As a result, the NRA should have been particularly vigilant in its disclosures on its 2014 tax return.

\textsuperscript{34} 26 U.S.C. §§ 6652(c)(1)(A)(i), 6652(c)(4); see also 2012 Instructions for Form 990, at 7.
\textsuperscript{35} 26 U.S.C. § 7206(1).
\textsuperscript{36} IRS, Background Paper, \textit{Summary of Form 990 Redesign Process}, August 19, 2008, at 1.
\textsuperscript{37} NRA 2014 Form 990, Part II.
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This tax return also was prepared by a sophisticated outside accounting firm, reviewed by the audit committee of the NRA board, and presented to the board itself before filing. Considering these warnings and safeguards, it appears likely the NRA’s failure to accurately report its political campaign spending was voluntary and intentional and thus a violation of 26 U.S.C. § 7206.

The NRA’s false representations on its 2008-2013 tax returns about its spending on outside lobbying, membership dues, and relationship with NRA-PVF also were material to the objective of transparency (including the public’s understanding of the NRA’s activities and funding sources), as well as to the determination of whether certain membership dues are nondeductible. If those representations also were voluntary and intentional, the NRA may have further violated 26 U.S.C. § 7206.

18 U.S.C. § 1001

Federal law further prohibits anyone from “knowingly and willfully” making “any materially false, fictitious, or fraudulent statement or representation” in any matter within the jurisdiction of the executive, legislative, or judicial branch. The prohibition also includes anyone who “falsifies, conceals, or covers up by any trick, scheme, or device a material fact.” Violations are punishable by up to five years in prison. If the NRA’s false representation about its spending on political campaign activity on its 2014 tax return was made knowingly and willfully, the NRA may have violated 18 U.S.C. § 1001. Similarly, if the NRA’s false representations on its 2008-2013 tax returns about its spending on outside lobbying, membership dues, and relationship with NRA-PVF were made knowingly and willfully, the NRA further may have violated 18 U.S.C. § 1001.

Conclusion

Last year, after a news report pointed out the NRA’s failure to disclose any political spending on its 2008-2013 tax returns and after CREW filed its initial complaint, the NRA claimed the omissions were merely a clerical error. Yet on its 2014 tax return, the NRA still failed to report another $25 million on political spending. Nor has the NRA corrected its 2008-2013 tax returns, and a further review of those returns shows the group appears to have made more misrepresentations to the IRS, all of which appear to have been aimed at minimizing or hiding the group’s political and lobbying spending. These multiple and repeated disclosure failures make it increasingly difficult to believe these errors are innocent. The IRS should have commenced an examination of the NRA in light of CREW’s initial complaint, and the additional issues explained in this letter should be considered in that investigation. Again, if the IRS finds

Hon. John Koskinen  
January 13, 2016  
Page 8

the NRA made false or incomplete statements on its tax returns, it should take appropriate action, including but not limited to referring this matter to the Department of Justice for prosecution.

Thank you for your prompt attention to this matter.

Sincerely,

[Signature]

Noah Bookbinder  
Executive Director  
Citizens for Responsibility and Ethics in Washington

Encls.

cc: IRS-EO Classification
EXHIBIT C
Political Organization
Report of Contributions and Expenditures

A For the period beginning 10/01/2008 and ending 11/24/2008

B Check applicable box: __ Initial report __ Change of address ✓ Amended report __ Final report

1 Name of organization
Republican Governors Association

Employer identification number
11 - 3655877

2 Mailing address (P.O. box or number, street, and room or suite number)
1747 Pennsylvania NW Suite 250

City or town, state, and ZIP code
Washington, DC 20006 -

3 E-mail address of organization: jpark@rga.org

4 Date organization was formed: 10/04/2002

5a Name of custodian of records
Michael G. Adams

5b Custodian's address
1747 Pennsylvania NW Suite 250
Washington, DC 20006 -

6a Name of contact person
Michael G. Adams

6b Contact person's address
1747 Pennsylvania NW Suite 250
Washington, DC 20006 -

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1747 Pennsylvania NW Suite 250

City or town, state, and ZIP code
Washington, DC 20006 -

8 Type of report (check only one box)

- First quarterly report
  (due by April 15)
- Second quarterly report
  (due by July 15)
- Third quarterly report
  (due by October 15)
- Year-end report
  (due by January 31)
- Mid-year report (Non-election year only-due by July 31)

- Monthly report for the month of:
  (due by the 20th day following the month shown above, except the December report, which is due by January 31)
- Pre-election report (due by the 12th or 15th day before the election)
  (1) Type of election:
  (2) Date of election:
  (3) For the state of:
- Post-general election report (due by the 30th day after general election)
  (1) Date of election: 11/04/2008
  (2) For the state of: DC

9 Total amount of reported contributions (total from all attached Schedules A)........................................... 9. $ 4297838

10 Total amount of reported expenditures (total from all attached Schedules B).................................................. 10. $ 9409161

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Michael G. Adams

Signature of authorized official

Date 02/09/2009
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>The GEO Group, Inc. One Park Place, Suite 700 621 N.W. 53rd Street Boca Raton, FL 33487 -</td>
<td>NA</td>
<td>$22038</td>
<td>11/11/2008</td>
</tr>
<tr>
<td>SFADA TAG AGENCY, INC. 625 N.E. 124TH STREET N MIAMI, FL 33161 -</td>
<td>NA</td>
<td>$10000</td>
<td>11/17/2008</td>
</tr>
<tr>
<td>BNSF RAILWAY COMPANY 2500 LOU MENIC DRIVE FORT WORTH, TX 76131 - 2828</td>
<td>NA</td>
<td>$450</td>
<td>10/21/2008</td>
</tr>
<tr>
<td>KRISTEN GULLOTT 2405 LESLIE AVENUE ALEXANDRIA, VA 22301 -</td>
<td>BROWN RUDNICK BERLACK ISRAELS LLP DIRECTOR, GOVERNMENT LAW AND STRATEGIES</td>
<td>$450</td>
<td>10/13/2008</td>
</tr>
<tr>
<td>ARAMARK ARAMARK TOWER 1101 MARKET STREET PHILADELPHIA, PA 19107 - 2980</td>
<td>NA</td>
<td>$25000</td>
<td>11/07/2008</td>
</tr>
<tr>
<td>KEY AND ASSOCIATES 12176 CHANCERY STATION CIRCLE RESTON, VA 20190 -</td>
<td>NA</td>
<td>$450</td>
<td>10/29/2008</td>
</tr>
<tr>
<td>NATIONAL RIFLE ASSOCIATION 11250 WAPLES MILL ROAD FAIRFAX, VA 22030 -</td>
<td>NA</td>
<td>$450</td>
<td>10/13/2008</td>
</tr>
<tr>
<td>TREW CARDENAS LLP FOUR SEASONS TOWER, 15TH FLOOR 1441 BRICKELL AVENUE MIAMI, FL 33131 - 3407</td>
<td>NA</td>
<td>$450</td>
<td>11/05/2008</td>
</tr>
<tr>
<td>ROBERT MCNAMARA ORLANDO CULINARY ACADEMY 8511 COMMODITY CIRCLE ORLANDO, FL 32819 -</td>
<td>CAREER EDUCATION CORPORATION VICE PRESIDENT FOR GOVERNMENT RELATIONS</td>
<td>$450</td>
<td>10/13/2008</td>
</tr>
<tr>
<td>ROY E. CARROLL II 3619 CAMDEN FALLS CIRCLE GREENSBORO, NC 27410 -</td>
<td>THE CARROLL COMPANY CHAIRMAN/CEO</td>
<td>$5000</td>
<td>10/09/2008</td>
</tr>
<tr>
<td>STEVEN E. CHANCELLOR P.O. BOX 5669 EVANSVILLE, IN 47716 - 5669</td>
<td>AMERIQUAL GROUP, LLC CHAIRMAN</td>
<td>$5000</td>
<td>10/23/2008</td>
</tr>
</tbody>
</table>
Form 8872
(November 2002)
Department of the Treasury
Internal Revenue Service

Political Organization
Report of Contributions and Expenditures

► See separate instructions.

A For the period beginning 07/01/2009 and ending 12/31/2009

B Check applicable box:
✓ Initial report
— Change of address
— Amended report
— Final report

1 Name of organization
Republican Governors Association

Employer identification number
11 - 3655877

2 Mailing address (P.O. box or number, street, and room or suite number)
1747 Pennsylvania NW Suite 250

City or town, state, and ZIP code
Washington, DC 20006 -

3 E-mail address of organization:
madams@rga.org

4 Date organization was formed:
10/04/2002

5a Name of custodian of records
Michael G. Adams

5b Custodian’s address
1747 Pennsylvania NW Suite 250
Washington, DC 20006 -

6a Name of contact person
Michael G. Adams

6b Contact person’s address
1747 Pennsylvania NW Suite 250
Washington, DC 20006 -

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1747 Pennsylvania NW Suite 250

City or town, state, and ZIP code
Washington, DC 20006 -

8 Type of report (check only one box)
✓ Year-end report
(due by January 31)
— Monthly report for the month of:
(due by the 20th day following the month shown above, except the
December report, which is due by January 31)
— Pre-election report (due by the 12th or 15th day before the election)
(1) Type of election:
(2) Date of election:
(3) For the state of:
— Post-general election report (due by the 30th day after general election)
(1) Date of election:
(2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A)
9. $ 17891230

10 Total amount of reported expenditures (total from all attached Schedules B)
10. $ 12305207

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Michael G. Adams
Signature of authorized official

02/01/2010
Date
<table>
<thead>
<tr>
<th>Name of contributor's employer</th>
<th>Contributor's occupation</th>
<th>Aggregate contributions year-to-date</th>
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</thead>
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<tr>
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<tr>
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<td>HOMEMAKER</td>
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<td>N/A</td>
<td>N/A</td>
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<td>N/A</td>
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<tr>
<td>N/A</td>
<td>N/A</td>
<td>$10450</td>
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<td>SELF EMPLOYED</td>
<td>ENTREPRENEUR</td>
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</tr>
<tr>
<td>INFORMATION REQUESTED</td>
<td>INFORMATION REQUESTED</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Amount of contribution</th>
<th>Date of contribution</th>
</tr>
</thead>
<tbody>
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</tr>
<tr>
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Form 8872
(September 2002)
Department of the Treasury
Internal Revenue Service

Political Organization
Report of Contributions and Expenditures

See separate instructions.

A For the period beginning 10/01/2010 and ending 11/22/2010

B Check applicable box: ___ Initial report ___ Change of address ✓ Amended report ___ Final report

1 Name of organization
Republican Governors Association

Employer identification number
11 - 3655877

2 Mailing address (P.O. box or number, street, and room or suite number)
1747 Pennsylvania NW Suite 250

City or town, state, and zip code
Washington, DC 20006 -

3 E-mail address of organization:
madams@rga.org

4 Date organization was formed:
10/04/2002

5a Name of custodian of records
Michael G. Adams

5b Custodian's address
1747 Pennsylvania NW Suite 250
Washington, DC 20006 -

6a Name of contact person
Michael G. Adams

6b Contact person's address
1747 Pennsylvania NW Suite 250
Washington, DC 20006 -

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1747 Pennsylvania NW Suite 250

City or town, state, and zip code
Washington, DC 20006 -

8 Type of report (check only one box)

First quarterly report (due by April 15)
Second quarterly report (due by July 15)
Third quarterly report (due by October 15)
Year-end report (due by January 31)
Mid-year report (Non-election year only-due by July 31)

Monthly report for the month of:
(due by the 20th day following the month shown above, except the December report, which is due by January 31)

Pre-election report (due by the 12th or 15th day before the election)
(1) Type of election:
(2) Date of election:
(3) For the state of:

Post-general election report (due by the 30th day after general election)
(1) Date of election: 11/02/2010
(2) For the state of: DC

9 Total amount of reported contributions (total from all attached Schedules A)..................................................9. $26108995

10 Total amount of reported expenditures (total from all attached Schedules B)....................................................10. $57413818

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Michael G. Adams

Signature of authorized official

04/18/2011
<table>
<thead>
<tr>
<th>Name of contributor's employer</th>
<th>Contribution Information</th>
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</thead>
<tbody>
<tr>
<td><strong>AMGEN PAC</strong></td>
<td><strong>N/A</strong></td>
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<tr>
<td><strong>ROBERT BOULEY</strong></td>
<td><strong>WHITE FARMS DAIRY</strong></td>
</tr>
<tr>
<td><strong>ORACLE</strong></td>
<td><strong>N/A</strong></td>
</tr>
<tr>
<td><strong>DIAGEO</strong></td>
<td><strong>N/A</strong></td>
</tr>
<tr>
<td><strong>OSI RESTAURANT PARTNERS PAC</strong></td>
<td><strong>WHITE FARMS DAIRY</strong></td>
</tr>
<tr>
<td><strong>JILL BOULEY</strong></td>
<td><strong>WHITE FARMS DAIRY</strong></td>
</tr>
<tr>
<td><strong>JERONIMO ESTEVE</strong></td>
<td><strong>BECLA INTERNATIONAL</strong></td>
</tr>
<tr>
<td><strong>NEIL AUERBACH</strong></td>
<td><strong>HUDSON CLEAN ENERGY PARTNERS</strong></td>
</tr>
<tr>
<td><strong>BORZA LAW PLLC</strong></td>
<td><strong>N/A</strong></td>
</tr>
<tr>
<td><strong>DUTO WORLDWIDE</strong></td>
<td><strong>N/A</strong></td>
</tr>
<tr>
<td><strong>AGGREGATE CONTRIBUTIONS YEAR-TO-DATE</strong></td>
<td><strong>$1000</strong></td>
</tr>
</tbody>
</table>
Political Organization
Report of Contributions and Expenditures

For the period beginning 07/01/2011 and ending 12/31/2011

Check applicable box:
- Initial report
- Change of address
- Amended report
- Final report

Name of organization
Republican Governors Association

Employer Identification number
11 - 3655977

Mailing address (P.O. box or number, street, and room or suite number)
1747 Pennsylvania NW Suite 250

City or town, state, and ZIP code
Washington, DC 20006 -

E-mail address of organization:
madams@rga.org

Date organization was formed:
10/04/2002

Name of custodian of records
Michael G. Adams

Custodian's address
1747 Pennsylvania NW Suite 250
Washington, DC 20006 -

Name of contact person
Michael G. Adams

Contact person's address
1747 Pennsylvania NW Suite 250
Washington, DC 20006 -

Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1747 Pennsylvania NW Suite 250

City or town, state, and ZIP code
Washington, DC 20006 -

Type of report (check only one box)
- Monthly report for the month of:
  (due by the 20th day following the month shown above, except the December report, which is due by January 31)
- Pre-election report (due by the 12th or 15th day before the election)
  (1) Type of election:
  (2) Date of election:
  (3) For the state of:
- Post-general election report (due by the 30th day after general election)
  (1) Date of election:
  (2) For the state of:
- First quarterly report
  (due by April 15)
- Second quarterly report
  (due by July 15)
- Third quarterly report
  (due by October 15)
- Year-end report
  (due by January 31)
- Mid-year report (Non-election year only due by July 31)

Total amount of reported contributions (total from all attached Schedules A)........................................9. $ 22076782

Total amount of reported expenditures (total from all attached Schedules B)........................................10. $ 11720690

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

MICHAEL G ADAMS

Signature of authorized official
01/31/2012

Date
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>AMERICAN STRUCTUREPOINT INC. 7260 SHADELAND STATION INDIANAPOLIS, IN 46256 -</td>
<td>Name of contributor's employer</td>
<td>$25000</td>
<td>12/16/2011</td>
</tr>
<tr>
<td>GAY LAURANCE PO BOX 867 CANAAN, CT 06018 -</td>
<td>Name of contributor's employer</td>
<td>$450</td>
<td>11/11/2011</td>
</tr>
<tr>
<td>VIRGINIA WINE MARKETING OFFICE 1001 E BROAD ST SUITE 140 RICHMOND, VA 23219 -</td>
<td>Name of contributor's employer</td>
<td>$1000</td>
<td>11/17/2011</td>
</tr>
<tr>
<td>HEALTHWAYS, INC. 701 COOL SPRINGS BLVD AP MAIL STOP 1 FRANKLIN, TN 37067 -</td>
<td>Name of contributor's employer</td>
<td>$1350</td>
<td>11/01/2011</td>
</tr>
<tr>
<td>EDUCATION MANAGEMENT LLC 210 SIXTH AVENUE 33RD FLOOR PITTSBURGH, PA 15222 -</td>
<td>Name of contributor's employer</td>
<td>$18450</td>
<td>10/26/2011</td>
</tr>
<tr>
<td>NOVOD NORDISK 100 COLLEGE ROAD PRINCETON, NJ 08540 -</td>
<td>Name of contributor's employer</td>
<td>$185450</td>
<td>12/19/2011</td>
</tr>
<tr>
<td>AMERICAN NATURAL GAS ALLIANCE 1201 NEW YORK AVE NW SUITE 1110 WASHINGTON, DC 20005 -</td>
<td>Name of contributor's employer</td>
<td>$900</td>
<td>11/01/2011</td>
</tr>
<tr>
<td>VARIETY STORES, INC. PO DRAWER 947 HENDERSON, NC 27536 -</td>
<td>Name of contributor's employer</td>
<td>$100000</td>
<td>12/15/2011</td>
</tr>
<tr>
<td>MOTOROLA PO BOX 68429 SCHAUMBURG, IL 60168 -</td>
<td>Name of contributor's employer</td>
<td>$76350</td>
<td>12/06/2011</td>
</tr>
<tr>
<td>EMILY MORRIS 1030 PEACHTREE ST N.E. UNIT 3015 ATLANTA, GA 30309 -</td>
<td>Name of contributor's employer</td>
<td>$1000</td>
<td>09/28/2011</td>
</tr>
<tr>
<td>NATIONAL RIFLE ASSOCIATION 11250 WAPLES MILL ROAD FAIRFAX, VA 22030 -</td>
<td>Name of contributor's employer</td>
<td>$5032</td>
<td>11/03/2011</td>
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</tbody>
</table>
Form 8872
(November 2002)
Department of the Treasury
Internal Revenue Service

Political Organization
Report of Contributions and Expenditures

See separate instructions.

A For the period beginning 10/01/2012 and ending 11/26/2012

B Check applicable box:  _ Initial report  _ Change of address  ☑ Amended report  _ Final report

1 Name of organization
Republican Governors Association

Employer identification number
11 - 3655877

2 Mailing address (P.O. box or number, street, and room or suite number)
1747 Pennsylvania NW Suite 250

City or town, state, and ZIP code
Washington, DC 20006 -

3 E-mail address of organization:
madams@rga.org

4 Date organization was formed:
10/04/2002

5a Name of custodian of records
Michael G. Adams

5b Custodian’s address
1747 Pennsylvania NW Suite 250
Washington, DC 20006 -

6a Name of contact person
Michael G. Adams

6b Contact person’s address
1747 Pennsylvania NW Suite 250
Washington, DC 20006 -

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1747 Pennsylvania NW Suite 250

City or town, state, and ZIP code
Washington, DC 20006 -

8 Type of report (check only one box)

_ First quarterly report (due by April 15)
_ Second quarterly report (due by July 15)
_ Third quarterly report (due by October 15)
_ Year-end report (due by January 31)
_ Mid-year report (Non-election year only-due by July 31)

_ Monthly report for the month of:
(1) Type of election:
(2) Date of election:
(3) For the state of:
_ Pre-election report (due by the 12th or 16th day before the election)
(1) Date of election: 11/06/2012
(2) For the state of: DC

_ Post-general election report (due by the 30th day after general election)

9 Total amount of reported contributions (total from all attached Schedules A)......................................................... 9. $ 10063539

10 Total amount of reported expenditures (total from all attached Schedules B)......................................................... 10. $ 19024960

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Michael G. Adams
Signature of authorized official
01/17/2013
Date
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>JOHN PUNGE 4531 RANCHO DEL MAR TRAIL SAN DIEGO, CA 92130 -</td>
<td>RETIRED</td>
<td>$990</td>
<td>10/30/2012</td>
</tr>
<tr>
<td>AMERICAN GAS ASSOCIATION 400 N CAPITOL STREET, NW WASHINGTON, DC 20001 -</td>
<td>N/A</td>
<td>$450</td>
<td>10/09/2012</td>
</tr>
<tr>
<td>CERNER CORP. 2800 ROCKCREEK PKWY KANSAS CITY, MO 64034 -</td>
<td>N/A</td>
<td>$450</td>
<td>10/17/2012</td>
</tr>
<tr>
<td>NATIONAL RIFLE ASSOCIATION 11250 WAPLES MILL ROAD FAIRFAX, VA 22030 -</td>
<td>N/A</td>
<td>$850</td>
<td>11/13/2012</td>
</tr>
<tr>
<td>PKF-MARK III, INC. 170 PHEASANT RUN PO BOX 390 NEWTOWN, PA 18940 -</td>
<td>N/A</td>
<td>$1000</td>
<td>10/12/2012</td>
</tr>
<tr>
<td>RICHARD WEISS 1304 HAWTHORNE LANE HINSDALE, IL 60521 -</td>
<td>HAWTHORNE RANCH</td>
<td>$200</td>
<td>10/13/2012</td>
</tr>
<tr>
<td>PAUL SINGER 1 WEST 81ST STREET NEW YORK, NY 10024 -</td>
<td>ELLIOTT MANAGEMENT</td>
<td>$125000</td>
<td>10/11/2012</td>
</tr>
<tr>
<td>STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY 3 STATE FARM PLAZA BLOOMINGTON, IL 61711 -</td>
<td>N/A</td>
<td>$60000</td>
<td>10/04/2012</td>
</tr>
<tr>
<td>HNTB CORPORATION 715 KIRK DRIVE KANSAS CITY, MO 64105 -</td>
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<td>$60000</td>
<td>10/12/2012</td>
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<tr>
<td>EDISON ELECTRIC INSTITUTE 701 PENNSYLVANIA AVE. NW WASHINGTON, DC 20004 -</td>
<td>N/A</td>
<td>$25000</td>
<td>10/16/2012</td>
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<tr>
<td>ANDREW PHARO 13 PEACHTREE ST BIRMINGHAM, AL 35213 -</td>
<td>MONUMENT TELECOMMUNICATIONS</td>
<td>$25000</td>
<td>10/25/2012</td>
</tr>
</tbody>
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**Political Organization**

**Report of Contributions and Expenditures**

- See separate instructions.

**For the period beginning** 07/01/2013 and ending 12/31/2013

**Check applicable box:**
- Initial report
- Change of address
- Amended report
- Final report

**1 Name of organization**
Republican Governors Association

**Employer identification number**
11 - 3655877

**2 Mailing address (P.O. box or number, street, and room or suite number)**
1747 Pennsylvania NW Suite 250
Washington, DC 20006

**3 E-mail address of organization:**
madame@rga.org

**4 Date organization was formed:**
10/04/2002

**5a Name of custodian of records**
Michael G. Adams

**5b Custodian’s address**
1747 Pennsylvania NW Suite 250
Washington, DC 20006

**6a Name of contact person**
Michael G. Adams

**6b Contact person’s address**
1747 Pennsylvania NW Suite 250
Washington, DC 20006

**7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number**
1747 Pennsylvania NW Suite 250
Washington, DC 20006

**8 Type of report (check only one box)**
- First quarterly report (due by April 15)
- Second quarterly report (due by July 15)
- Third quarterly report (due by October 15)
- Year-end report (due by January 31)
- Mid-year report (Non-election year only-due by July 31)

- Monthly report for the month of:
  (due by the 20th day following the month shown above, except the December report, which is due by January 31)
- Pre-election report (due by the 12th or 16th day before the election)
  (1) Type of election:
  (2) Date of election:
  (3) For the state of:
- Post-general election report (due by the 30th day after general election)
  (1) Date of election:
  (2) For the state of:

**9 Total amount of reported contributions (total from all attached Schedules A)**

| Amount | 9. | $27041386 |

**10 Total amount of reported expenditures (total from all attached Schedules B)**

| Amount | 10. | $15066732 |

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

**Signature of authorized official**
Michael G. Adams

**Date**
02/03/2014
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Contributor's occupation</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>NATIONAL RIFLE ASSOCIATION 11250 WAPLES MILL ROAD FAIRFAX, VA 22030</td>
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<td>N/A</td>
<td>$ 25000</td>
<td>07/24/2013</td>
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<tr>
<td>DENNIS BONE 7 DOGWOOD DRIVE MADISON, NJ 07940</td>
<td>ROMA BANK DIRECTOR</td>
<td>N/A</td>
<td>$ 2500</td>
<td>11/12/2013</td>
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<tr>
<td>GELLER ASSOCIATES LLC 19 S LASALLE ST SUITE 1100 CHICAGO, IL 60603</td>
<td>N/A</td>
<td>N/A</td>
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<td>08/16/2013</td>
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<tr>
<td>INTUIT 7535 TORREY SANTA FE ROAD SAN DIEGO, CA 92129</td>
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<td>10/25/2013</td>
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<tr>
<td>EDUCATION MANAGEMENT LLC 210 SIXTH AVENUE 33RD FLOOR PITTSBURGH, PA 15222</td>
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<td>N/A</td>
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<td>10/09/2013</td>
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<tr>
<td>ALLAN TESSLER 2500 MOOSE WILSON ROAD WILSON, WY 83014</td>
<td>SELF-EMPLOYED</td>
<td>N/A</td>
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<td>12/30/2013</td>
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<td>MARKWEST ENERGY OPERATING COMPANY, L.L.C. 1515 ARAPAHOE STREET TOWER 1, SUITE 1600 DENVER, CO 80202</td>
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<td>N/A</td>
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<td>08/23/2013</td>
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<td>SOUTHWESTERN ENERGY 2350 NORTH SAM HOUSTON PKWY E SUITE 125 HOUSTON, TX 77032</td>
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<td>N/A</td>
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<td>09/04/2013</td>
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<tr>
<td>RIVADA NETWORKS LLC IN-KIND TRAVEL 245 PARK AVENUE 39TH FLOOR NEW YORK, NY 10167</td>
<td>N/A</td>
<td>N/A</td>
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<td>11/20/2013</td>
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<tr>
<td>PERNOD RICARD USA 100 MANHATTANVILLE RD. 4TH FLOOR PURCHASE, NY 10577</td>
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<td>ALLERGAN USA, INC. 2525 DUPONT DRIVE IRVINE, CA 92612</td>
<td>N/A</td>
<td>N/A</td>
<td>$ 450</td>
<td>10/09/2013</td>
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### Form 8872

**Political Organization**

**Report of Contributions and Expenditures**

**See separate instructions.**

<table>
<thead>
<tr>
<th>A For the period beginning</th>
<th>10/01/2014</th>
<th>and ending</th>
<th>11/24/2014</th>
</tr>
</thead>
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**B Check applicable box:**
- Initial report
- Change of address
- Amended report
- Final report

<table>
<thead>
<tr>
<th>1 Name of organization</th>
<th>Republican Governors Association</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Employer identification number</strong></td>
<td>11 - 3655877</td>
</tr>
</tbody>
</table>

| 2 Mailing address (P.O. box or number, street, and room or suite number) |
| 1747 Pennsylvania NW Suite 250 |

| City or town, state, and ZIP code |
| Washington, DC 20006 |

| 3 E-mail address of organization: |
| madams@rga.org |

| 4 Date organization was formed: |
| 10/04/2002 |

| 5a Name of custodian of records |
| Michael G. Adams |

| 5b Custodian's address |
| 1747 Pennsylvania NW Suite 250 |

| Washington, DC 20006 |

| 6a Name of contact person |
| Michael G. Adams |

| 6b Contact person's address |
| 1747 Pennsylvania NW Suite 250 |

| Washington, DC 20006 |

| 7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number |
| 1747 Pennsylvania NW Suite 250 |

| City or town, state, and ZIP code |
| Washington, DC 20006 |

| 8 Type of report (check only one box) |
| Monthly report for the month of: |
| (due by the 20th day following the month shown above, except the December report, which is due by January 31) |
| Pre-election report (due by the 12th or 15th day before the election) |
| (1) Type of election: |
| (2) Date of election: |
| (3) For the state of: |
| Post-general election report (due by the 30th day after general election) |
| (1) Date of election: 11/04/2014 |
| (2) For the state of: DC |

| 9 Total amount of reported contributions (total from all attached Schedules A) |
| $ 24617617 |

| 10 Total amount of reported expenditures (total from all attached Schedules B) |
| $ 50184263 |

**Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.**

Michael G. Adams  
01/05/2015

Sign Here  
Signature of authorized official  
Date
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
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</thead>
<tbody>
<tr>
<td>NATIONAL RIFLE ASSOCIATION 1250 WAPLES MILL ROAD FAIRFAX, VA 22030</td>
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<td>N/A</td>
<td>Contribution's occupation N/A</td>
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<td>Name of contributor's employer</td>
<td>Amount of contribution</td>
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<tr>
<td>N/A</td>
<td>Contribution's occupation N/A</td>
<td>$ 2500 10/20/2014</td>
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<tr>
<td>JOHN HAMMOND 612 E. 13TH ST. INDIANAPOLIS, IN 46202</td>
<td>Name of contributor's employer</td>
<td>Amount of contribution</td>
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<tr>
<td>ICE MILLER</td>
<td>Contribution's occupation PARTNER</td>
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<tr>
<td>DANIEL LOEB 15 CENTRAL PARK WEST PH 39 NEW YORK, NY 10023</td>
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<td>Amount of contribution</td>
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<tr>
<td>THIRD POINT LLC</td>
<td>Contribution's occupation FOUNDER</td>
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</tr>
<tr>
<td>AMGEN 1 AMGEN CENTER DR. THOUSAND OAKS, CA 91320</td>
<td>Name of contributor's employer</td>
<td>Amount of contribution</td>
</tr>
<tr>
<td>N/A</td>
<td>Contribution's occupation N/A</td>
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<tr>
<td>VAHAN GUREGHIAN 841 MERION SQUARE ROAD GLADWYNE, PA 19035</td>
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<td>Amount of contribution</td>
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<tr>
<td>CSMI LLC</td>
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<tr>
<td>HDR, INC. 8404 INDIAN HILLS DRIVE OMAHA, NE 68114</td>
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<td>ARS LAND DEVELOPMENT LLC 8505 W MOUNTAIN VIEW LANE LITTLETON, CO 80125</td>
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<td>Harlan Cohen LLC 472 N Maple Avenue Ridgewood, NJ 07450</td>
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<td>SEDGWICK LLP 2900 K STREET NW WASHINGTON, DC 20007</td>
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<td>N/A</td>
<td>Contribution's occupation N/A</td>
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</table>
Political Organization
Report of Contributions and Expenditures

For the period beginning 11/01/2009 and ending 11/30/2009

Check applicable box:  ✓ Initial report  ___ Change of address  ___ Amended report  ___ Final report

1 Name of organization
Republican State Leadership Committee - RSLC

Employer identification number
05-0532524

2 Mailing address (P.O. box or number, street, and room or suite number)
1800 Diagonal Road Suite 230
Alexandria, VA 22314 -

City or town, state, and ZIP code
Alexandria, VA 22314 -

3 E-mail address of organization:
rlc@rlc.com

4 Date organization was formed:
09/25/2002

5a Name of custodian of records
Staci A. Goede

5b Custodian’s address
1800 Diagonal Road Suite 230
Alexandria, VA 22314 -

6a Name of contact person
Scott S. Ward

6b Contact person’s address
1800 Diagonal Road Suite 230
Alexandria, VA 22314 -

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1800 Diagonal Road Suite 230

City or town, state, and ZIP code
Alexandria, VA 22314 -

8 Type of report (check only one box)

- First quarterly report
  (due by April 15)

- Second quarterly report
  (due by July 15)

- Third quarterly report
  (due by October 15)

- Year-end report
  (due by January 31)

- Mid-year report (Non-election year only-due by July 31)

✓ Monthly report for the month of: November
  (due by the 20th day following the month shown above, except the December report, which is due by January 31)

  - Pre-election report (due by the 12th or 15th day before the election)
  
  - Type of election:
  
  - Date of election:
  
  - For the state of:

  - Post-general election report (due by the 30th day after general election)
  
  - Date of election:
  
  - For the state of:

9 Total amount of reported contributions (total from all attached Schedules A).......................... 9.  $ 367133

10 Total amount of reported expenditures (total from all attached Schedules B).......................... 10.  $ 360165

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Scott S Ward

Signature of authorized official

Date 12/21/2009
<table>
<thead>
<tr>
<th>Name of contributor's employer</th>
<th>Name of contributor's employer</th>
<th>Name of contributor's employer</th>
<th>Name of contributor's employer</th>
<th>Name of contributor's employer</th>
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</thead>
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<tr>
<td>RETIRED</td>
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<td>N/A</td>
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</tbody>
</table>
Political Organization
Report of Contributions and Expenditures

A For the period beginning 11/01/2011 and ending 11/30/2011

B Check applicable box: ✓ Initial report — Change of address — Amended report — Final report

1 Name of organization
Republican State Leadership Committee - RSLC

Employer identification number
05 - 0532524

2 Mailing address (P.O. box or number, street, and room or suite number)
1800 Diagonal Road Suite 230
Alexandria, VA 22314 -

City or town, state, and ZIP code
Alexandria, VA 22314 -

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Staci A. Goede

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1800 Diagonal Road Suite 230
Alexandria, VA 22314 -

6a Name of contact person
J. Christopher Jankowski

6b Contact person's address
1800 Diagonal Road Suite 230
Alexandria, VA 22314 -

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Alexandria, VA 22314 -

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(due by April 15)
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(due by July 15)
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(due by October 15)
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year only-due by July 31)
✓ Monthly report for the month of: November
(due by the 20th day following the month shown above, except the
December report, which is due by January 31)
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(1) Type of election:
(2) Date of election:
(3) For the state of:
— Post-general election report (due by the 30th day after general election)
(1) Date of election:
(2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A) .................................................. 9. $ 1182623

10 Total amount of reported expenditures (total from all attached Schedules B) .................................................. 10. $ 782410

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

J Christopher Jankowski 12/20/2011

Signature of authorized official Date
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
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<td>DOMINION RESOURCES SERVICES, INC.</td>
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<td>ONE JAMES RIVER PLAZA, 20TH FL RICHMOND, VA 23261 -</td>
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<th>Amount of contribution</th>
<th>Date of contribution</th>
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<tbody>
<tr>
<td>MR. ROBERT EARL GREEN</td>
<td>RETIRED</td>
<td>$55</td>
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<td>205 LANDFALL ROAD NW ATLANTA, GA 30328 -</td>
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<th>Amount of contribution</th>
<th>Date of contribution</th>
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<td>LTC. ROY C. CLARK JR. U. S. 703 N. MANSFIELD STREET ALEXANDRIA, VA 22304 -</td>
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<th>Amount of contribution</th>
<th>Date of contribution</th>
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<td>MS. SUSAN C. BERGER</td>
<td>OFFICES OF MATTHEW BERGER</td>
<td>$100</td>
<td>11/09/2011</td>
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<tr>
<td>44 REYNOLDS ST KINGSTON, PA 18704 -</td>
<td>Contributor's occupation</td>
<td>ASSISTANT MANAGER</td>
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<table>
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<th>Amount of contribution</th>
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<td>100 JIM MORAN BLVD. DEERFIELD BEACH, FL 33442 -</td>
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<th>Amount of contribution</th>
<th>Date of contribution</th>
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<tbody>
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<td>KAPLAN FOX AND KILSHEIMER LLP</td>
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<th>Amount of contribution</th>
<th>Date of contribution</th>
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<td>MRS. JESSIE E. THEIM</td>
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<td>PO BOX 4396 WILSONVILLE, OR 97070 -</td>
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<th>Amount of contribution</th>
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<td>11/22/2011</td>
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<tr>
<td>5140 W. HURLEY POND ROAD WALL TOWNSHIP, NJ 07727 -</td>
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<th>Contributor's name, mailing address and ZIP code</th>
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<th>Date of contribution</th>
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<tbody>
<tr>
<td>RIGGS ABNEY NEAL TURPIN ORBISON AND LEWIS</td>
<td>N/A</td>
<td>$514</td>
<td>11/29/2011</td>
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<tr>
<td>5801 N. BROADWAY SUITE 101 OKLAHOMA CITY, OK 73118 -</td>
<td>Contributor's occupation</td>
<td>N/A</td>
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<td></td>
<td>Aggregate contributions year-to-date</td>
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<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>318 GROUP 4854 BROOKSVIEW COURT NEW ALBANY, OH 43054 -</td>
<td>N/A</td>
<td>$299</td>
<td>11/29/2011</td>
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<td></td>
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<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
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<tbody>
<tr>
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<td>11/28/2011</td>
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<tr>
<td>11250 WAPLES MILL ROAD - NORTH FAIRFAX, VA 22030 -</td>
<td>Contributor's occupation</td>
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<tr>
<td></td>
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<td>$15551</td>
<td></td>
</tr>
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</table>
Political Organization
Report of Contributions and Expenditures

A For the period beginning 10/01/2012 and ending 11/26/2012

B Check applicable box: _ Initial report _ Change of address _ Amended report _ Final report

1 Name of organization
Republican State Leadership Committee - RSLC

Employer identification number
05 - 0532524

2 Mailing address (P.O. box or number, street, and room or suite number)
1201 F Street NW SUITE 675

City or town, state, and ZIP code
Washington, DC 20004

3 E-mail address of organization:
rslc@rslc.com

4 Date organization was formed:
09/25/2002

5a Name of custodian of records
Staci A. Goeke

5b Custodian’s address
1201 F Street NW SUITE 675
Washington, DC 20004

6a Name of contact person
J. Christopher Jankowski

6b Contact person’s address
1201 F Street NW SUITE 675
Washington, DC 20004

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1201 F Street NW SUITE 675

City or town, state, and ZIP code
Washington, DC 20004

8 Type of report (check only one box)

_ First quarterly report
(due by April 15)

_ Second quarterly report
(due by July 15)

_ Third quarterly report
(due by October 15)

_ Year-end report
(due by January 31)

_ Mid-year report (Non-election year only-due by July 31)

_ Monthly report for the month of:
(due by the 20th day following the month shown above, except the
December report, which is due by January 31)

_ Pre-election report (due by the 12th or 15th day before the election)

(1) Type of election:
(2) Date of election:
(3) For the state of:

_ Post-general election report (due by the 30th day after general election)

(1) Date of election: //
(2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A)................................................................. 9. $ 9372222

10 Total amount of reported expenditures (total from all attached Schedules B)................................................................. 10. $ 13442249

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

J Christopher Jankowski

Sign Here
Signature of authorized official

Date

06/21/2013
<table>
<thead>
<tr>
<th>Schedule A</th>
<th>Itemized Contributions</th>
</tr>
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<tbody>
<tr>
<td><strong>Contributor's name, mailing address and ZIP code</strong></td>
<td><strong>Name of contributor's employer</strong></td>
</tr>
<tr>
<td>NATIONAL RIFLE ASSOCIATION - INSTITUTE FOR LEGISLATURE 11220 WAPLES MILL ROAD - NORTH FAIRFAX, VA 22030 -</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Contributor's name, mailing address and ZIP code</strong></td>
<td><strong>Name of contributor's employer</strong></td>
</tr>
<tr>
<td>ALTRIA CLIENT SERVICES, INC. 6801 WEST BROAD STREET RICHMOND, VA 23230 -</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Contributor's name, mailing address and ZIP code</strong></td>
<td><strong>Name of contributor's employer</strong></td>
</tr>
<tr>
<td>DUKE ENERGY/DUKE POWER COMPANY PO BOX 37920 CHARLOTTE, NC 28237 -</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Contributor's name, mailing address and ZIP code</strong></td>
<td><strong>Name of contributor's employer</strong></td>
</tr>
<tr>
<td>CONSOL ENERGY 1000 CONSOL ENERGY DRIVE CANONSBURG, PA 15317 -</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Contributor's name, mailing address and ZIP code</strong></td>
<td><strong>Name of contributor's employer</strong></td>
</tr>
<tr>
<td>CNA/CONTINENTAL CASUALTY COMPANY 1 CNA PLAZA CHICAGO, IL 60685 -</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Contributor's name, mailing address and ZIP code</strong></td>
<td><strong>Name of contributor's employer</strong></td>
</tr>
<tr>
<td>LEROY BERRETT P.O. BOX 1129 HANFORD, CA 93232 -</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Contributor's name, mailing address and ZIP code</strong></td>
<td><strong>Name of contributor's employer</strong></td>
</tr>
<tr>
<td>MOTION PICTURE ASSOCIATION OF AMERICA, INC. 15503 VENTURA BOULEVARD ENCINO, CA 91436 -</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Contributor's name, mailing address and ZIP code</strong></td>
<td><strong>Name of contributor's employer</strong></td>
</tr>
<tr>
<td>ELIZABETH GROEGER 236 LYONS CREEK ROAD MACON, NC 27501 -</td>
<td>RETIRED</td>
</tr>
<tr>
<td><strong>Contributor's name, mailing address and ZIP code</strong></td>
<td><strong>Name of contributor's employer</strong></td>
</tr>
<tr>
<td>WILLIAM LOOS 119 COLVINHURST DRIVE BUFFALO, NY 14223 -</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Contributor's name, mailing address and ZIP code</strong></td>
<td><strong>Name of contributor's employer</strong></td>
</tr>
<tr>
<td>ANDRIA ALLEN 123 NARROW LANE P.O. BOX 73 SOUTH LANCASTER, MA 01561 -</td>
<td>N.Y. PRO INC.</td>
</tr>
<tr>
<td><strong>Contributor's name, mailing address and ZIP code</strong></td>
<td><strong>Name of contributor's employer</strong></td>
</tr>
<tr>
<td>COMCAST CORPORATION 1500 MARKET STREET PHILADELPHIA, PA 19102 -</td>
<td>N/A</td>
</tr>
</tbody>
</table>
Form 8872
Report of Contributions and Expenditures

A For the period beginning 12/01/2013 and ending 12/31/2013

B Check applicable box:  
- Initial report  
- Change of address  
- Amended report  
- Final report

1 Name of organization  
Republican State Leadership Committee - RSLC

Employer identification number  
05-0532524

2 Mailing address (P.O. box or number, street, and room or suite number)  
1201 F Street NW SUITE 675

City or town, state, and ZIP code  
Washington, DC 20004

3 E-mail address of organization:  
rslc@rslc.com

4 Date organization was formed:  
09/25/2002

5a Name of custodian of records  
Staci A. Goede

5b Custodian's address  
1201 F Street NW SUITE 675

Washington, DC 20004

6a Name of contact person  
Matthew C. Walter

6b Contact person's address  
1201 F Street NW SUITE 675

Washington, DC 20004

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number  
1201 F Street NW SUITE 675

City or town, state, and ZIP code  
Washington, DC 20004

8 Type of report (check only one box)  
- First quarterly report (due by April 15)  
- Second quarterly report (due by July 15)  
- Third quarterly report (due by October 15)  
- Year-end report (due by January 31)  
- Mid-year report (Non-election year only; due by July 31)  
- Monthly report for the month of:  
(due by the 20th day following the month shown above, except the December report, which is due by January 31)  
- Pre-election report (due by the 12th or 15th day before the election)  
(1) Type of election:  
(2) Date of election:  
(3) For the state of:  
- Post-general election report (due by the 30th day after general election)  
(1) Date of election:  
(2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A)  ......................................................... 9. $ 1529713

10 Total amount of reported expenditures (total from all attached Schedules B) .......................................................... 10. $ 2195414

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Matthew C Walter  
08/31/2015

Signature of authorized official  
Date
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>NELSON MULLINS RILEY AND SCARBOROUGH, LLP PO BOX 11070 COLUMBIA, SC 29211</td>
<td>N/A</td>
<td>$10000 12/06/2013</td>
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<tr>
<td>DALE FALES 11 BURRELL CT MIDLAND, MI 48640</td>
<td>RETIRED</td>
<td>$100 12/04/2013</td>
</tr>
<tr>
<td>ALLEN SIMON 1383 N. CRISS STREET CHANDLER, AZ 85226</td>
<td>RETIRED</td>
<td>$250 12/03/2013</td>
</tr>
<tr>
<td>F. FRIESS PO BOX 9790 JACKSON, WY 83002</td>
<td>FRIESS FAMILY FOUNDATION OWNER</td>
<td>$10000 12/31/2013</td>
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<tr>
<td>SHELL OIL COMPANY 910 LOUISIANA STREET HOUSTON, TX 77002</td>
<td>N/A</td>
<td>$20000 12/31/2013</td>
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<tr>
<td>GENERAL ELECTRIC COMPANY POLITICAL ACTION COMMITTE 1299 PENNSYLVANIA AVENUE, NW SUITE 900 WASHINGTON, DC 20004</td>
<td>N/A</td>
<td>$10000 12/06/2013</td>
</tr>
<tr>
<td>LLOYD SWENSON 35431 TALUS LANE PALM DESERT, CA 92211</td>
<td>RETIRED</td>
<td>$110 12/27/2013</td>
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<tr>
<td>NATIONAL RIFLE ASSOCIATION - INSTITUTE FOR LEGISLATION 11250 WAPLES MILL ROAD - NORTH FAIRFAX, VA 22030</td>
<td>N/A</td>
<td>$150 12/04/2013</td>
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<tr>
<td>JONATHAN BARRETT 301 E 66TH STREET 14F NEW YORK, NY 10065</td>
<td>LUMINUS MANAGEMENT, LLC MANAGING DIRECTOR</td>
<td>$25000 12/31/2013</td>
</tr>
<tr>
<td>CHARLES MISSAR 5420 CONNECTICUT AVE NW WASHINGTON, DC 20015</td>
<td>SELF-EMPLOYED CONSULTANT</td>
<td>$50 12/09/2013</td>
</tr>
<tr>
<td>AMERICAN FOREST AND PAPER ASSOCIATION 1111 19TH STREET, NW WASHINGTON, DC 20036</td>
<td>N/A</td>
<td>$265 12/20/2013</td>
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</table>
Political Organization
Report of Contributions and Expenditures

A For the period beginning 09/01/2014 and ending 09/30/2014

B Check applicable box: ☑ Initial report □ Change of address □ Amended report □ Final report

1 Name of organization
Republican State Leadership Committee - RSLC

2 Mailing address (P.O. box or number, street, and room or suite number)
1201 F Street NW SUITE 675

City or town, state, and ZIP code
Washington, DC 20004

3 E-mail address of organization:
rslc@rslc.com

4 Date organization was formed:
09/25/2002

5a Name of custodian of records
Staci A. Goede

5b Custodian's address
1201 F Street NW SUITE 675
Washington, DC 20004

6a Name of contact person
Matthew C. Walter

6b Contact person's address
1201 F Street NW SUITE 675
Washington, DC 20004

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1201 F Street NW SUITE 675

City or town, state, and ZIP code
Washington, DC 20004

8 Type of report (check only one box)

☐ First quarterly report (due by April 15)
☐ Second quarterly report (due by July 15)
☐ Third quarterly report (due by October 15)
☐ Year-end report (due by January 31)
☐ Mid-year report (Non-election year only due by July 31)

☐ Monthly report for the month of: September (due by the 20th day following the month shown above, except the December report, which is due by January 31)
☐ Pre-election report (due by the 12th or 15th day before the election)
(1) Type of election:
(2) Date of election:
(3) For the state of:
☐ Post-general election report (due by the 30th day after general election)
(1) Date of election:
(2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A)
$ 2523234

10 Total amount of reported expenditures (total from all attached Schedules B)
$ 2626941

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Matthew C Walter 10/20/2014
Signature of authorized official
Date
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
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<td>ADVANTAGE CAPITAL PARTNERS</td>
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<td>DONALD GOSS</td>
<td>N/A</td>
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<td>09/09/2014</td>
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<td>4807 JOHNSON AVENUE WESTERN SPRINGS, IL 60558</td>
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<tr>
<td>SHIRELY LOWE</td>
<td>N/A</td>
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<td>09/08/2014</td>
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<td>68800 WINTER LANE VENETA, OR 97467</td>
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<td></td>
</tr>
<tr>
<td>MELVIN RIES</td>
<td>N/A</td>
<td>$ 125</td>
<td>09/05/2014</td>
</tr>
<tr>
<td>3585 ROUND BARN BLVD. APARTMENT 329 SANTA ROSA</td>
<td>N/A</td>
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<td></td>
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<tr>
<td>ORLANDO, FL 32837</td>
<td>N/A</td>
<td>$ 3985</td>
<td>09/15/2014</td>
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<td>DARDEN RESTAURANTS, INC.</td>
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<td></td>
</tr>
<tr>
<td>1000 DARDEN CENTER DRIVE ORLANDO, FL 32837</td>
<td>N/A</td>
<td>$ 200</td>
<td>09/19/2014</td>
</tr>
<tr>
<td>NANCY ROTH</td>
<td>RETIRED</td>
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<td></td>
</tr>
<tr>
<td>8545 CARMEL VALLEY ROAD CARMEL, CA 93923</td>
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</tr>
<tr>
<td>JANELLE FILE</td>
<td>N/A</td>
<td>$ 100</td>
<td>09/03/2014</td>
</tr>
<tr>
<td>16250 BORDEN ROAD CRESCENT, IA 51526</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>FRANK HOFFMANN</td>
<td>N/A</td>
<td>$ 50</td>
<td>09/03/2014</td>
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<tr>
<td>9121 CARDIFF ROAD NORTH CHESTERFIELD, VA 23236</td>
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<td>AMERIHEALTH CARITAS SERVICES LLC</td>
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<td>200 STEVENS DRIVE PHILADELPHIA, PA 19113</td>
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<td>NATIONAL RIFLE ASSOCIATION - INSTITUTE FOR LEGISL A</td>
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<td>09/05/2014</td>
</tr>
<tr>
<td>11250 WAPLES MILL ROAD - NORTH FAIRFAX, VA 22030</td>
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</tr>
<tr>
<td>RAYMOND PINK</td>
<td>RETIRED</td>
<td>$ 110</td>
<td>09/02/2014</td>
</tr>
<tr>
<td>PO. BOX 134 WILLIAMSTON, MI 48895</td>
<td>RETIRED</td>
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<tr>
<td>Name of contributor's employer</td>
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<tr>
<td>$ 110</td>
<td>$ 300</td>
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</tr>
</tbody>
</table>
Political Organization
Report of Contributions and Expenditures

For the period beginning 10/18/2008 and ending 11/24/2008

B Check applicable box: ✓ Initial report  _ Change of address  _ Amended report  _ Final report

1 Name of organization
Democratic Governors Association

Employer identification number
52 - 1304889

2 Mailing address (P.O. box or number, street, and room or suite number)
1401 K Street, NW Suite 200

City or town, state, and ZIP code
Washington, DC 20005 -

3 E-mail address of organization:
metcalf@dga.net

4 Date organization was formed:
01/01/1963

5a Name of custodian of records
Ben Metcalf

5b Custodian's address
1401 K Street, NW Suite 200
Washington, DC 20005 -

6a Name of contact person
Ben Metcalf

6b Contact person's address
1401 K Street, NW Suite 200
Washington, DC 20005 -

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1401 K Street, NW Suite 200

City or town, state, and ZIP code
Washington, DC 20005 -

8 Type of report (check only one box)

- First quarterly report
  (due by April 15)
- Second quarterly report
  (due by July 15)
- Third quarterly report
  (due by October 15)
- Year-end report
  (due by January 31)
- Mid-year report (Non-election year only-due by July 31)
- Monthly report for the month of:
  (due by the 20th day following the month shown above, except the December report, which is due by January 31)
- Pre-election report (due by the 12th or 15th day before the election)
  (1) Type of election:
  (2) Date of election:
  (3) For the state of:
- Post-general election report (due by the 30th day after general election)
  (1) Date of election: 11/04/2008
  (2) For the state of: DC

9 Total amount of reported contributions (total from all attached Schedules A) ........................................... 9. $ 240,384.5

10 Total amount of reported expenditures (total from all attached Schedules B) .................................................. 10. $ 194,402.3

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Ben Metcalf

Signature of authorized official

12/04/2008

Date
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barr Laboratories, Inc. 2 Quaker Road Pomona, NY 10970</td>
<td>NA</td>
<td>$250</td>
<td>11/18/2008</td>
</tr>
<tr>
<td>NRA Institute for Legislative Action 11250 Waples Mill Road North Tower Fairfax, VA 22030</td>
<td>NA</td>
<td>$295</td>
<td>10/16/2008</td>
</tr>
<tr>
<td>Rittenhouse Consulting Group Bellevue, Suite 430 200 S. Broad Street Philadelphia, PA 19102</td>
<td>NA</td>
<td>$1000</td>
<td>11/12/2008</td>
</tr>
<tr>
<td>Richard Alford 33 Sleeper Street, Apt. 207 Boston, MA 02210</td>
<td>Information Requested</td>
<td>$50</td>
<td>10/30/2008</td>
</tr>
<tr>
<td>George Mead 2737 S. Xanadu Way Aurora, CO 80010</td>
<td>Retired</td>
<td>$100</td>
<td>10/21/2008</td>
</tr>
<tr>
<td>Terry Gardner 1480 Kathleen Lane Orange, CA 92867</td>
<td>Information Requested</td>
<td>$50</td>
<td>10/23/2008</td>
</tr>
<tr>
<td>Patrick Judge 1512 Audubon Street New Orleans, LA 70118</td>
<td>Department Director</td>
<td>$100</td>
<td>10/23/2008</td>
</tr>
<tr>
<td>Richard Cantor 257 President Street Brooklyn, NY 11231</td>
<td>Centors Pecorella, Inc.</td>
<td>$250</td>
<td>10/20/2008</td>
</tr>
<tr>
<td>Medco Health Solutions, Inc. 100 Parsons Pond Drive Franklin Lakes, NJ 07417</td>
<td>NA</td>
<td>$295</td>
<td>10/16/2008</td>
</tr>
<tr>
<td>Keefe Group 10880 Linpage Place St. Louis, MO 63132</td>
<td>NA</td>
<td>$295</td>
<td>10/16/2008</td>
</tr>
</tbody>
</table>
Political Organization
Report of Contributions and Expenditures

For the period beginning 07/01/2009 and ending 12/31/2009

Check applicable box:
- Initial report
- Change of address
☑ Amended report
- Final report

1 Name of organization
Democratic Governors Association

Employer identification number
52 - 1304889

2 Mailing address (P.O. box or number, street, and room or suite number)
1401 K Streeet, NW Suite 200

City or town, state, and ZIP code
Washington, DC 20005 -

3 E-mail address of organization:
metcalf@dga.net

4 Date organization was formed:
01/01/1983

5a Name of custodian of records
Ben Metcalf

5b Custodian's address
1401 K Streeet, NW Suite 200
Washington, DC 20005 -

6a Name of contact person
Ben Metcalf

6b Contact person's address
1401 K Streeet, NW Suite 200
Washington, DC 20005 -

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1401 K Streeet, NW Suite 200

City or town, state, and ZIP code
Washington, DC 20005 -

8 Type of report (check only one box)

- First quarterly report (due by April 15)
- Second quarterly report (due by July 15)
- Third quarterly report (due by October 15)
-President-end report (due by January 31)
- Mid-year report (Non-election year only-due by July 31)

Monthly report for the month of:
(due by the 20th day following the month shown above, except the
December report, which is due by January 31)

Pre-election report (due by the 12th or 15th day before the election)
(1) Type of election:
(2) Date of election:
(3) For the state of:

Post-general election report (due by the 30th day after general election)
(1) Date of election:
(2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A) ........................................ 9. $ 11675246

10 Total amount of reported expenditures (total from all attached Schedules B) ........................................ 10. $ 6668592

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Ben Metcalf

Signature of authorized official
03/04/2010

Date
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
</tr>
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<tbody>
<tr>
<td>Jeffrey R. Gural 300 Central Park West Apartment 9E New York, NY 10024</td>
<td>Newmark Realty</td>
<td>$ 5000</td>
<td>08/14/2009</td>
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<tr>
<td>Atria Group, Inc. 120 Park Ave New York, NY 10017 - 5579</td>
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<td>$ 25000</td>
<td>07/27/2009</td>
</tr>
<tr>
<td>NRA Institute for Legislative Action 11250 Waples Mill Road North Tower Fairfax, VA 22030</td>
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<td>$ 590</td>
<td>11/12/2009</td>
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<td>Edward Rawson 6433 Georgetown Pike McLean, VA 22101</td>
<td>Retired</td>
<td>$ 100</td>
<td>09/26/2009</td>
</tr>
<tr>
<td>Frank Sengowski 517 Satellite Drive El Paso, TX 79912</td>
<td>Retired</td>
<td>$ 500</td>
<td>08/23/2009</td>
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<tr>
<td>Cerner Corporation 2800 Rockcreek Parkway Kansas City, MO 64117 - 1121</td>
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<tr>
<td>Atria Senior Living Group 401 South 4th Street 1900 Louisville, KY 40202</td>
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<tr>
<td>Sally Gray 1884 S County Road 500 W Greencastle, IN 46135</td>
<td>Retired</td>
<td>$ 250</td>
<td>10/23/2009</td>
</tr>
<tr>
<td>Jerry Abramowicz 680 Broadway New York, NY 10012</td>
<td>Self</td>
<td>$ 50</td>
<td>11/01/2009</td>
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<td>Anheuser-Busch Companies 1 Busch Place Saint Louis, MO 63118</td>
<td>NA</td>
<td>$ 25000</td>
<td>12/31/2009</td>
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<tr>
<td>Arthur Larson 713 Flagship Terrace Tinton Falls, NJ 07753</td>
<td>NA</td>
<td>$ 75</td>
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<table>
<thead>
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<tr>
<td>Chairman</td>
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<td>NA</td>
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<td>NA</td>
<td>$ 25590</td>
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<tr>
<td>Computer Systems Analyst</td>
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<td>Retired</td>
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<td>Retired</td>
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<td>Retired</td>
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**Political Organization**
**Report of Contributions and Expenditures**

<table>
<thead>
<tr>
<th>Form 8872</th>
<th>Department of the Treasury Internal Revenue Service</th>
</tr>
</thead>
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<tr>
<td>(November 2002)</td>
<td></td>
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</tbody>
</table>

**A For the period beginning** 04/01/2010 **and ending** 06/30/2010

**B Check applicable box:**
- [ ] Initial report
- [ ] Change of address
- [ ] Amended report
- [ ] Final report

**1 Name of organization**
Democratic Governors Association

**Employer identification number**
52 - 1304889

**2 Mailing address (P.O. box or number, street, and room or suite number)**
1401 K Street, NW Suite 200

**City or town, state, and ZIP code**
Washington, DC 20005

**3 E-mail address of organization:**
metcalf@dga.net

**4 Date organization was formed:**
01/01/1983

**5a Name of custodian of records**
Ben Metcalf

**5b Custodian's address**
1401 K Street, NW Suite 200
Washington, DC 20005

**6a Name of contact person**
Ben Metcalf

**6b Contact person's address**
1401 K Street, NW Suite 200
Washington, DC 20005

**7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number**
1401 K Street, NW Suite 200

**City or town, state, and ZIP code**
Washington, DC 20005

**8 Type of report (check only one box)**

- [ ] First quarterly report (due by April 15)
- [ ] Second quarterly report (due by July 15)
- [ ] Third quarterly report (due by October 15)
- [ ] Year-end report (due by January 31)
- [ ] Mid-year report (Non-election year only-due by July 31)

**Monthly report for the month of:**
(due by the 20th day following the month shown above, except the December report, which is due by January 31)

- [ ] Pre-election report (due by the 12th or 15th day before the election)

- [ ] Type of election:
- [ ] Date of election:
- [ ] For the state of:
- [ ] Post-general election report (due by the 30th day after general election)

- [ ] Date of election:
- [ ] For the state of:

**9 Total amount of reported contributions (total from all attached Schedules A)**
9. $ 9041974

**10 Total amount of reported expenditures (total from all attached Schedules B)**
10. $ 8915158

*Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.*

**Sign Here**

**Signature of authorized official**

**Date**

07/15/2010
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
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<tbody>
<tr>
<td>HDR Engineering 9387 Carver Road Suite 200 Cincinnati, OH 45242</td>
<td>NA</td>
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<td>Rittenhouse Consulting Group Bellevue, Suite 430 200 S. Broad Street Philadelphia, PA 19102</td>
<td>NA</td>
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<tr>
<td>Oracle Corporation 1801 Sunset Blvd No. 9163154271 Rocklin, CA 95685 - 3702</td>
<td>NA</td>
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<tr>
<td>James E. Snodgrass 1330 E Deepwell Road Palm Springs, CA 92264 - 8518</td>
<td>None</td>
<td>$ 75</td>
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<tr>
<td>Edwin Mueller 5204 NW 141st Street Vancouver, WA 98885</td>
<td>None</td>
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<td>NiiZetto 6051 South Willow Drive Greenwood Village, CO 80111 - 5148</td>
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<td>Infratol 11360 Technology Circle Duluth, GA 30097</td>
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<td>Bruce M. Donaldson 3209 Cordoba Street Silver Spring, MD 20904</td>
<td>Information Requested</td>
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<td>Helene C. Bullen 6210 Utah Avenue NW Washington, DC 20015</td>
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<td>Adele Dremon 308 Plaza Road N Fair Lawn, NJ 07410</td>
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<th>Contributor's name, mailing address and ZIP code</th>
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<tr>
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</tbody>
</table>
Political Organization
Report of Contributions and Expenditures

A For the period beginning 07/01/2012 and ending 09/30/2012

B Check applicable box:
✓ Initial report  __ Change of address  __ Amended report  __ Final report

1 Name of organization
Democratic Governors Association

Employer identification number
52 - 1304889

2 Mailing address (P.O. box or number, street, and room or suite number)
1401 K St. NW Suite 200

City or town, state, and ZIP code
Washington, DC 20005 -

3 E-mail address of organization:
metcalf@dga.net

4 Date organization was formed:
01/01/1983

5a Name of custodian of records
Ben Metcalf

5b Custodian’s address
1401 K St. NW Suite 200
Washington, DC 20005 -

6a Name of contact person
Ben Metcalf

6b Contact person’s address
1401 K St. NW Suite 200
Washington, DC 20005 -

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1401 K St. NW Suite 200

City or town, state, and ZIP code
Washington, DC 20005 -

8 Type of report (check only one box)

✓ Third quarterly report
(due by November 15)

9 Monthly report for the month of:
(due by the 20th day following the month shown above, except the
December report, which is due by January 31)

10 Pre-election report (due by the 12th or 15th day before the election)
(1) Type of election:
(2) Date of election:

11 Post-election report (due by the 30th day after general election)
(1) Date of election:
(2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A).................................................. 9. $ 7586387

10 Total amount of reported expenditures (total from all attached Schedules B).................................................. 10. $ 11740523

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Ben Metcalf

Signature of authorized official

Date 10/15/2012
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
</tr>
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<tbody>
<tr>
<td>Robert M Casper PO Box 329 Winterset, IA 50273</td>
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<td>09/11/2012</td>
</tr>
<tr>
<td>Southgate Shopping Center 20 S. Charles Street Suite 300 Baltimore, MD 21201</td>
<td>Information Requested</td>
<td>$1000</td>
<td>07/02/2012</td>
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<tr>
<td>F David Roberts 80 Lyme Road, Apt. 62 Hanover, NH 03755</td>
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<td>09/29/2012</td>
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<tr>
<td>NRA Institute for Legislative Action 11250 Waples Mill Road North Tower Fairfax, VA 22030</td>
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<td>07/31/2012</td>
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<td>Dwight Gleasman 3797 Moffett Road Reckton, IL 61072</td>
<td>Information Requested</td>
<td>$350</td>
<td>09/11/2012</td>
</tr>
<tr>
<td>Eugene Boudreau 1209 Beattie Lane Sebastopol, CA 95472</td>
<td>Information Requested</td>
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<td>09/29/2012</td>
</tr>
<tr>
<td>Richard Rubin 38 The Crossing At Blind Brk. Purchase, NY 10577</td>
<td>Information Requested</td>
<td>$300</td>
<td>08/15/2012</td>
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<tr>
<td>Sybil W. Stoller 1100 Rivas Canyon Pacific Palisades, CA 90272</td>
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<td>09/11/2012</td>
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<tr>
<td>Daina Vanhoutum 174 Maplewood Street Watertown, MA 02472</td>
<td>Information Requested</td>
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<tr>
<td>Tammy Oren 11520 Woodbridge Street Studio City, CA 91604 - 2715</td>
<td>Information Requested</td>
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<td>09/11/2012</td>
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<tr>
<td>Toby Berger 810 Gilliams Mountain Road Charlottesville, VA 22903</td>
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<table>
<thead>
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</table>
Political Organization
Report of Contributions and Expenditures

For the period beginning 11/25/2014 and ending 12/31/2014

B Check applicable box:  ✔ Initial report  — Change of address  — Amended report  — Final report

1 Name of organization
Republican Attorneys General Association

2 Mailing address (P.O. box or number, street, and room or suite number)
1747 Pennsylvania Avenue NW Suite 800

City or town, state, and ZIP code
Washington, DC 20006

3 E-mail address of organization:
swill@ropublicanags.com

4 Date organization was formed:
01/15/2014

5a Name of custodian of records
Lee Russell

5b Custodian's address
1747 Pennsylvania Avenue NW Suite 800
Washington, DC 20006

6a Name of contact person
Scott Will

6b Contact person's address
1747 Pennsylvania Avenue NW Suite 800
Washington, DC 20006

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1747 Pennsylvania Avenue NW Suite 800

City or town, state, and ZIP code
Washington, DC 20006

8 Type of report (check only one box)

- First quarterly report (due by April 15)
- Second quarterly report (due by July 15)
- Third quarterly report (due by October 15)
 ✔ Mid-year report (Non-election year only-due by July 31)

Monthly report for the month of:
(due by the 20th day following the month shown above, except the December report, which is due by January 31)

- Pre-election report (due by the 12th or 15th day before the election)
  (1) Type of election:
  (2) Date of election:
  (3) For the state of:
  — Post-general election report (due by the 30th day after general election)
    (1) Date of election:
    (2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A).......................... 9. $ 889334

10 Total amount of reported expenditures (total from all attached Schedules B).............................. 10. $ 556500

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Lee Russell
Signature of authorized official

01/30/2015
Date
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>SWEDISH MATCH 1021 E CARY ST SUITE 1600 RICHMOND, VA 23219</td>
<td>N/A</td>
<td>$ 410</td>
</tr>
<tr>
<td>ENTERTAINMENT SOFTWARE ASSOCIATION 575 7TH STREET NW SUITE 300 WASHINGTON, DC 20004</td>
<td>N/A</td>
<td>$ 415</td>
</tr>
<tr>
<td>AETNA, INC. 151 FARMINGTON AVENUE HARTFORD, CT 06156 -</td>
<td>N/A</td>
<td>$ 15000</td>
</tr>
<tr>
<td>KAPLAN FOX and KILSHEIMER LLP 850 THIRD AVENUE 14TH FLOOR NEW YORK, NY 10022 -</td>
<td>N/A</td>
<td>$ 15000</td>
</tr>
<tr>
<td>INTERNATIONAL GAME TECHNOLOGY P.O. BOX 10580 N/A RENO, NV 89510</td>
<td>N/A</td>
<td>$ 15000</td>
</tr>
<tr>
<td>JM FAMILY ENTERPRISES 347 N. NEW RIVER DRIVE E N/A FT. LAUDERDALE, FL 33301</td>
<td>N/A</td>
<td>$ 15000</td>
</tr>
<tr>
<td>EXPEDIA, INC. 5000 W KEARNY STREET N/A SPRINGFIELD, MO 65803</td>
<td>N/A</td>
<td>$ 150</td>
</tr>
<tr>
<td>LORILLARD TOBACCO CO 714 GREEN VALLEY ROAD PO BOX 10529 GREENSBORO, NC 27404</td>
<td>N/A</td>
<td>$ 415</td>
</tr>
<tr>
<td>NATIONAL RIFLE ASSOCIATION 11250 WAPLES MILL ROAD N/A FAIRFAX, VA 22030</td>
<td>N/A</td>
<td>$ 300</td>
</tr>
<tr>
<td>WESTERN UNION 12510 EAST BELFORD AVENUE N/A ENGLEWOOD, CO 80112</td>
<td>N/A</td>
<td>$ 15000</td>
</tr>
<tr>
<td>INTERNATIONAL COUNCIL OF SHOPPING CENTERS, INC. 1221 AVENUE OF THE AMERICANS THE MCGRAW-HILL BUILDING NEW YORK, NY 10020</td>
<td>N/A</td>
<td>$ 15000</td>
</tr>
<tr>
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<tr>
<td></td>
<td>N/A</td>
<td>$ 15000</td>
</tr>
</tbody>
</table>
Political Organization
Report of Contributions and Expenditures

For the period beginning 11/25/2008 and ending 12/31/2008

Check applicable box: ✓ Initial report, __ Change of address, __ Amended report, __ Final report

**Name of organization**
Democratic Attorneys General Association, Inc.

**Employer identification number**
13 - 42290019

**Mailing address (P.O. box or number, street, and room or suite number)**
1580 Lincoln Street Suite 1125

**City or town, state, and ZIP code**
Denver, CO 80203 -

**E-mail address of organization:**
no@email

**Date organization was formed:**
11/04/2002

**Name of custodian of records**
Travis Berry

**Custodian's address**
1580 Lincoln
Denver, CO 80203 -

**Name of contact person**
Travis Berry

**Contact person's address**
1580 Lincoln
Denver, CO 80203 -

**Business address of organization (if different from mailing address shown above). Number, street, and room or suite number**
1580 Lincoln

**City or town, state, and ZIP code**
Denver, CO 80203 -

**Type of report (check only one box)**
- First quarterly report (due by April 15)
- Second quarterly report (due by July 15)
- Third quarterly report (due by October 15)
✓ Year-end report (due by January 31)
- Mid-year report (Non-election year only–due by July 31)

- Monthly report for the month of:
  (due by the 20th day following the month shown above, except the December report, which is due by January 31)
- Pre-election report (due by the 12th or 15th day before the election)
  (1) Type of election:
  (2) Date of election:
  (3) For the state of:
- Post-general election report (due by the 30th day after general election)
  (1) Date of election:
  (2) For the state of:

**Total amount of reported contributions (total from all attached Schedules A).......................... 9. $ 201500**

**Total amount of reported expenditures (total from all attached Schedules B).......................... 10. $ 122409**

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Travis Berry

Signature of authorized official

Date 02/02/2009
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
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<tr>
<td>Zuckerman Spaeder LLP 1800 M STREET SUITE 1000 WASHINGTON, DC 20036</td>
<td>N/A</td>
<td>$15000</td>
<td>12/19/2008</td>
</tr>
<tr>
<td>BARROWAY, TOPAZ, KESSLER, MELTZER &amp; CHECK 280 King of Prussia Road Radnor, PA 19087</td>
<td>N/A</td>
<td>$50000</td>
<td>12/23/2008</td>
</tr>
<tr>
<td>NATIONAL RESTAURANT ASSOCIATION 1200 Seventeenth Street, NW Washington, DC 20036</td>
<td>N/A</td>
<td>$2000</td>
<td>12/19/2008</td>
</tr>
<tr>
<td>EBAY CA 2145 HAMILTON AVENUE SAN JOSE, CA 95125</td>
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<td>$2000</td>
<td>12/19/2008</td>
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<tr>
<td>NRA-INSTITUTE FOR LEGISLATIVE ACTION 11250 Waples Mill Road-North Tower Fairfax, VA 22030</td>
<td>N/A</td>
<td>$2500</td>
<td>12/19/2008</td>
</tr>
<tr>
<td>GLAXO SMITH KLINE PO BOX 13681 PHILADELPHIA, PA 19101</td>
<td>N/A</td>
<td>$25000</td>
<td>12/23/2008</td>
</tr>
<tr>
<td>MCKENNA, LONG &amp; ALDRIDGE 303 Peachtree, Street, NE Atlanta, GA 30308</td>
<td>N/A</td>
<td>$2500</td>
<td>12/23/2008</td>
</tr>
<tr>
<td>DICKSTEIN SHAPIRO 1825 EYE STREET NW Washington, DC 20006</td>
<td>N/A</td>
<td>$25000</td>
<td>12/23/2008</td>
</tr>
<tr>
<td>CTIA 1400 16TH STREES NW STE 600 Washington, DC 20036</td>
<td>N/A</td>
<td>$25000</td>
<td>12/19/2008</td>
</tr>
<tr>
<td>STATE FARM INS ONE STATE FARM PLAZA #A3 BLOOMINGTON, IL 61710</td>
<td>N/A</td>
<td>$25000</td>
<td>12/19/2008</td>
</tr>
<tr>
<td>HEWLETT PACKARD Finance Operations PO Box 2810 Colorado Springs, CO 80901 - 2810</td>
<td>N/A</td>
<td>$50000</td>
<td>12/23/2008</td>
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</tbody>
</table>
Political Organization
Report of Contributions and Expenditures

For the period beginning 07/01/2009 and ending 12/31/2009

Check applicable box:  
- Initial report  
- Change of address  
- Amended report  
- Final report

1 Name of organization
Democratic Attorneys General Association, Inc.

2 Mailing address (P.O. box or number, street, and room or suite number)
1580 Lincoln Street Suite 1125

City or town, state, and ZIP code
Denver, CO 80203

3 E-mail address of organization:
no@email

4 Date organization was formed:
11/04/2002

5a Name of custodian of records
Travis Berry

5b Custodian's address
1580 Lincoln Street Suite 1125
Denver, CO 80203

6a Name of contact person
Travis Berry

6b Contact person's address
1580 Lincoln Street Suite 1125
Denver, CO 80203

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1580 Lincoln Street Suite 1125

City or town, state, and ZIP code
Denver, CO 80203

8 Type of report (check only one box)
- First quarterly report (due by April 15)
- Second quarterly report (due by July 15)
- Third quarterly report (due by October 15)
- Year-end report (due by January 31)
- Mid-year report (Non-election year only-due by July 31)
- Monthly report for the month of:
  (due by the 20th day following the month shown above, except the December report, which is due by January 31)
- Pre-election report (due by the 12th or 15th day before the election)
  (1) Type of election:
  (2) Date of election:
  (3) For the state of:
  Post-general election report (due by the 30th day after general election)
  (1) Date of election:
  (2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A) ................................................. 9. $ 1383000

10 Total amount of reported expenditures (total from all attached Schedules B) .................................................. 10. $ 794476

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Travis Berry
Signature of authorized official

03/18/2010
Date
<table>
<thead>
<tr>
<th>Contributor's name, mailing address and ZIP code</th>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
</tr>
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<tbody>
<tr>
<td>PFEIFER, JEFFREY 570 High Street Denver, CO 80218</td>
<td>LexisNexis</td>
<td>$250</td>
<td>10/07/2009</td>
</tr>
<tr>
<td>NOVO NORDISK 500 NEW JERSEY AVENUE NW STE 350 WASHINGTON, DC 20001</td>
<td></td>
<td>$15000</td>
<td>12/17/2009</td>
</tr>
<tr>
<td>MONSENTO 800 N LINDBERGH ST LOUIS, MO 63124</td>
<td></td>
<td>$50000</td>
<td>10/23/2009</td>
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<tr>
<td>DAVID BOHNETT 245 SOUTH BEVERLY DRIVE BEVERLY HILLS, CA 90212</td>
<td></td>
<td>$10000</td>
<td>10/23/2009</td>
</tr>
<tr>
<td>TARGET PO Box 1286 Minneapolis, MN 55440</td>
<td></td>
<td>$10000</td>
<td>06/05/2009</td>
</tr>
<tr>
<td>GGNSC ADMINISTRATIVE SERVICES 1000 FIANNA WAY FORT SMITH, AR 72919</td>
<td></td>
<td>$10000</td>
<td>10/01/2009</td>
</tr>
<tr>
<td>NUCLEAR ENERGY INSTITUTE 1776 I Street N.W. Ste #400 Washington, DC 20006</td>
<td></td>
<td>$10000</td>
<td>10/01/2009</td>
</tr>
<tr>
<td>BROWNSTEIN HYATT FERBER SCHRACK 410 17TH STREET SUITE 2200 DENVER, CO 80202</td>
<td></td>
<td>$10000</td>
<td>12/03/2009</td>
</tr>
<tr>
<td>BERNSTEIN LITOWITZ BERGER &amp; GROSSMAN 1285 AVENUE OF THE AMERICAS NEW YORK, NY 10019</td>
<td></td>
<td>$50000</td>
<td>12/03/2009</td>
</tr>
<tr>
<td>BERSTEIN LIEBHARD LLP 10 East 40th Street New York, NY 10016</td>
<td></td>
<td>$25000</td>
<td>09/21/2009</td>
</tr>
<tr>
<td>NRA-INSTITUTE FOR LEGISLATIVE ACTION 11250 Waples Mill Road-North tower Fairfax, VA 22030</td>
<td></td>
<td>$2500</td>
<td>10/1/2009</td>
</tr>
</tbody>
</table>
Political Organization
Report of Contributions and Expenditures

For the period beginning 01/01/2011 and ending 06/30/2011

B Check applicable box: ✓ Initial report  _ Change of address  _ Amended report  _ Final report

1 Name of organization
Democratic Attorneys General Association, Inc.

Employer identification number
13 - 4220019

2 Mailing address (P.O. box or number, street, and room or suite number)
1580 Lincoln Street Suite 1125

City or town, state, and ZIP code
Denver, CO 80203 -

3 E-mail address of organization:
no@email

4 Date organization was formed:
11/04/2002

5a Name of custodian of records
Travis Berry

5b Custodian's address
1580 Lincoln Street Suite 1125
Denver, CO 80203 -

6a Name of contact person
Travis Berry

6b Contact person's address
1580 Lincoln Street Suite 1125
Denver, CO 80203 -

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1580 Lincoln Street Suite 1125

City or town, state, and ZIP code
Denver, CO 80203 -

8 Type of report (check only one box)
✓ Mid-year report (Non-election year only—due by July 31)

Monthly report for the month of:
(due by the 20th day following the month shown above, except the December report, which is due by January 31)

Pre-election report (due by the 12th or 15th day before the election)
(1) Type of election:
(2) Date of election:
(3) For the state of:

Post-general election report (due by the 30th day after general election)
(1) Date of election:
(2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A)
9. $ 1603466

10 Total amount of reported expenditures (total from all attached Schedules B)
10. $ 886094

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Travis Berry

Signature of authorized official

07/29/2011

Date
<table>
<thead>
<tr>
<th>Name of contributor's employer</th>
<th>Amount of contribution</th>
<th>Date of contribution</th>
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<tbody>
<tr>
<td>PROPERTY CASUALTY INSURANCE</td>
<td>$ 10000</td>
<td>05/18/2011</td>
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<tr>
<td>SULLIVAN, RICHARD &amp; CAROLINE</td>
<td>$ 2500</td>
<td>02/25/2011</td>
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<tr>
<td>ARDA-RESORT OWNERS COALITION</td>
<td>$ 2500</td>
<td>04/04/2011</td>
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<tr>
<td>HUNTON &amp; WILLIAMS</td>
<td>$ 10000</td>
<td>05/18/2011</td>
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<tr>
<td>AMERICAN ELECTRIC POWER</td>
<td>$ 10000</td>
<td>03/25/2011</td>
</tr>
<tr>
<td>WYNDHAM VACATION OWNERSHIP</td>
<td>$ 10000</td>
<td>02/01/2011</td>
</tr>
<tr>
<td>NATIONAL RIFLE ASSOC OF AMERICA</td>
<td>$ 2500</td>
<td>05/18/2011</td>
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<tr>
<td>NATIONAL ENTERPRISE SYSTEMS, INC.</td>
<td>$ 15000</td>
<td>02/01/2011</td>
</tr>
<tr>
<td>PHARMACEUTICAL RESEARCH &amp; MANUFACTURERS</td>
<td>$ 15000</td>
<td>05/18/2011</td>
</tr>
<tr>
<td>LORILLARD TOBACCO COMPANY</td>
<td>$ 15000</td>
<td>05/18/2011</td>
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<tr>
<td>PITNEY BOWES</td>
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