

July 19, 2017

BY EMAIL: ElectionIntegrityStaff@ovp.eop.gov

Honorable Mike Pence
The Vice President
Chair, Presidential Advisory Commission on
Election Integrity
Eisenhower Executive Office Building
Room 350
1650 Pennsylvania Avenue, N.W.
Washington, D.C. 20502

Dear Mr. Vice President:

Citizens for Responsibility and Ethics in Washington (“CREW”) requests that the Presidential Advisory Commission on Election Integrity (the “Commission”) identify publicly all safeguards in place to ensure none of the data and other information the Commission is gathering can be used for any political or other purpose outside the scope of the Commission’s mission. The conduct of Vice Chair Kris Kobach, an announced candidate in Kansas’ 2018 gubernatorial election who already has used his Commission role to promote his candidacy, underscores the need to protect the Commission’s information from being used to advance a political campaign of any Commission member or President Donald Trump, to whom the Commission reports.

President Trump established the Commission by executive order on May 11, 2017, with a stated purpose of “study[ing] the registration and voting processes used in Federal elections.”¹ On that same day, the White House announced that Kansas Secretary of State Kris Kobach would serve as the Commission’s Vice-Chair.² On June 23, 2017, the Commission filed its charter with the General Services Administration. Under the express terms of the charter, the Commission is subject to the Federal Advisory Committee Act (“FACA”), 5 U.S.C. App, including that law’s disclosure requirements.

Although the Commission is holding its first publicly noticed meeting today, it already has undertaken a massive data collection – unprecedented in scope – sending letters to each Secretary of State on June 28, 2017, requesting each state’s publicly available voter roll data. Those letters specifically requested for each voter registrant their full name and middle initial; address; date of birth; political party; last four digits of their social security number; voter history

¹ Exec. Order 13799, § 3.

² Press Release, The White House, President Announces Formation of Bipartisan Presidential Commission on Election Integrity, May 11, 2017, *available at* <https://www.whitehouse.gov/the-press-office/2017/05/11/president-announces-formation-bipartisan-presidential-commission><https://www.whitehouse.gov/the-press-office/2017/05/11/president-announces-formation-bipartisan-presidential-commission>.

dating back to 2006; status as either active, inactive or cancelled; information about any felony convictions; information about voter registration in another state; military status; and overseas citizen information.³ The letter also requested state input on seven listed topics. Earlier that same day, Vice President Pence conducted a call with members of the Commission during which both the content and the wording of the letter reportedly were discussed.⁴ A White House press release describes the call as an “organizational call” during which Mr. Kobach informed Commission members “a letter will be sent today to the 50 states and District of Columbia on behalf of the Commission requesting publicly-available data from state voter rolls and feedback on how to improve election integrity.”⁵

The Commission’s data request already has generated significant controversy, with many states refusing to cooperate in whole or part. In a statement released on July 5, 2017, Mr. Kobach made clear that notwithstanding the states’ concerns, the Commission would “continue its work to gather the facts through public records requests[.]”⁶ Both the ACLU and the Lawyers’ Committee for Civil Rights Under Law (“Lawyers’ Committee”) have filed lawsuits challenging the Commission’s failure to comply fully with the FACA,⁷ while the Electronic Privacy Information Center (“EPIC”) has sued to halt the Commission’s voter data collection until a Privacy Impact Assessment is performed pursuant to the E-Government Act of 2002, 44 U.S.C. § 3501 note.⁸

Beyond the violations of law alleged in these lawsuits, the Commission’s attempt to amass what is, in effect, a national voter registry raises serious concerns about the potential for this data to be misused for partisan political purposes. The Lawyers’ Committee already has filed a complaint with the Office of Special Counsel requesting an investigation into Mr. Kobach’s apparent violations of the Hatch Act, 5 U.S.C. § 7323.⁹ The complaint discusses multiple occasions on which Mr. Kobach used his role as Commission Vice-Chair to promote on his campaign website, on social media, and in public appearances his candidacy for governor of Kansas and solicit campaign contributions. Mr. Kobach’s repeated and flagrant refusal to comply with the strict separation the Hatch Act mandates between government service and candidate activity provides no assurance he will respect the limitation that any data collected by the Commission be used only for Commission business.

³ A sample letter is enclosed as Exhibit A.

⁴ See, e.g., Mitch Herckis, Trump’s Election Integrity Commission Hasn’t Officially Met Yet – And It May Have Just Violated Federal Law, *Route Fifty*, June 30, 2017, available at <http://www.routefifty.com/management/2017/06/trumps-election-integrity-commission-faca/139141/>.

⁵ Press Release, Office of the Vice President, Readout of the Vice President’s Call With the Presidential Advisory Commission on Election Integrity, June 28, 2017, available at <https://www.whitehouse.gov/the-press-office/2017/06/28/readout-vice-presidents-call-presidential-advisory-commission-election>.

⁶ Press Release, The White House, Statement From Kris Kobach, Kansas Secretary of State and Vice Chair of the Presidential Advisory Commission on Election Integrity, July 5, 2017, available at <https://www.whitehouse.gov/the-press-office/2017/07/05/statement-kris-kobach-kansas-secretary-state-and-vice-chair-presidential>.

⁷ *Am. Civil Liberties Union v. Trump*, Civil No. 17-1351 (CKK) (D.D.C.); *Lawyers’ Comm. for Civil Rights Under Law v. Presidential Advisory Comm’n on Election Integrity*, Civil No. 17-1354 (CKK) (D.D.C.).

⁸ *EPIC v. Presidential Advisory Comm’n on Election Integrity*, Civil No. 17-1320 (CKK) (D.D.C.).

⁹ A copy of this letter, sent on July 3, 2017, is enclosed as Exhibit B.

Moreover, Mr. Kobach is not the only Commission member likely to run again for office. In addition to Mr. Kobach, three other members of the Commission are elected Secretaries of State (Connie Lawson of Indiana, Bill Gardner, of New Hampshire and Matt Dunlap of Maine), and President Trump has announced his intent to seek reelection in 2020. Given the potential for abuse, and the already cavalier attitude the Commission Vice-Chair has displayed toward his Commission responsibilities as a special government employee, it is imperative that the public and submitting states be given assurances that the Commission is taking all necessary steps to ensure none of the data it collects is used for a purpose unrelated to the Commission's mission.¹⁰

Underscoring these concerns is the hasty process by which the state letters were formulated and submitted, apparently with no consideration of their impact as the Paperwork Reduction and the E-Government Acts would have required. The Commission sent the letters out mere hours after conducting what you have described as merely an "organizational call" on June 26. The Commission has now abandoned its plan to use an unsecure Defense Department website to transfer data from the states to the White House, and has advised the court in the *EPIC* litigation that it has instead "repurposed" an existing White House system that the Commission will be able to access through "dedicated laptops[.]"¹¹

At the same time, government lawyers in the *EPIC* lawsuit have argued the Commission is not an agency and, therefore, not subject to statutes such as the E-Government Act and the Administrative Procedure Act. It is therefore clear that the White House is more than a nominal gatekeeper for the Commission's records, and is instead maintaining exclusive control over their creation, management, and retention. Without adequate safeguards in place to ensure those records are used only for Commission business, we face a very real threat that the data the Commission collects will find its way into political campaigns. It is therefore imperative that the Commission institute appropriate measures to prevent this from happening and provide the public with sufficient information to evaluate whether the Commission is properly protecting the massive national voter database it seeks to assemble.

If the Commission cannot put safeguards immediately in place to assure that the data cannot and will not be used for political purposes, the Commission should refrain from conducting any further business until it has resolved this issue. Failure to do so may cause at least some of the Commission members to violate the Hatch Act, which bars them as government employees from using their official authority or influence for the purposes of interfering with or affecting the result of an election.

¹⁰ There may, of course, be other reasons why states validly would refrain from submitting the requested information, including questions about the Commission's intended use of the data.

¹¹ *EPIC*, Declaration of Charles Christopher Herndon, Director, White House Information Technology, July 16, 2017 (Dkt. 38-1) (attached as Exhibit C).

Vice President Mike Pence
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Thank you for your prompt attention to this important matter.

Sincerely,



Noah Bookbinder
Executive Director
Citizens for Responsibility and Ethics in Washington

Encl.

cc: Honorable Kris Kobach
Vice-Chair, Presidential Advisory Commission on Election Integrity

Andrew Kossack
Associate Counsel and Designated Federal Officer, Presidential Advisory Commission on
Election Integrity

EXHIBIT A



Presidential Advisory Commission on Election Integrity

June 28, 2017

The Honorable Denise Merrill
Secretary of State
Capitol Office, PO Box 150470
Hartford, CT 06115-0470

Dear Secretary Merrill,

I serve as the Vice Chair for the Presidential Advisory Commission on Election Integrity (“Commission”), which was formed pursuant to Executive Order 13799 of May 11, 2017. The Commission is charged with studying the registration and voting processes used in federal elections and submitting a report to the President of the United States that identifies laws, rules, policies, activities, strategies, and practices that enhance or undermine the American people’s confidence in the integrity of federal elections processes.

As the Commission begins its work, I invite you to contribute your views and recommendations throughout this process. In particular:

1. What changes, if any, to federal election laws would you recommend to enhance the integrity of federal elections?
2. How can the Commission support state and local election administrators with regard to information technology security and vulnerabilities?
3. What laws, policies, or other issues hinder your ability to ensure the integrity of elections you administer?
4. What evidence or information do you have regarding instances of voter fraud or registration fraud in your state?
5. What convictions for election-related crimes have occurred in your state since the November 2000 federal election?
6. What recommendations do you have for preventing voter intimidation or disenfranchisement?
7. What other issues do you believe the Commission should consider?

In addition, in order for the Commission to fully analyze vulnerabilities and issues related to voter registration and voting, I am requesting that you provide to the Commission the publicly-available voter roll data for Connecticut, including, if publicly available under the laws of your state, the full first and last names of all registrants, middle names or initials if available, addresses, dates of birth, political party (if recorded in your state), last four digits of social

security number if available, voter history (elections voted in) from 2006 onward, active/inactive status, cancelled status, information regarding any felony convictions, information regarding voter registration in another state, information regarding military status, and overseas citizen information.

You may submit your responses electronically to ElectionIntegrityStaff@ovp.eop.gov or by utilizing the Safe Access File Exchange ("SAFE"), which is a secure FTP site the federal government uses for transferring large data files. You can access the SAFE site at <https://safe.amrdec.army.mil/safe/Welcome.aspx>. We would appreciate a response by July 14, 2017. Please be aware that any documents that are submitted to the full Commission will also be made available to the public. If you have any questions, please contact Commission staff at the same email address.

On behalf of my fellow commissioners, I also want to acknowledge your important leadership role in administering the elections within your state and the importance of state-level authority in our federalist system. It is crucial for the Commission to consider your input as it collects data and identifies areas of opportunity to increase the integrity of our election systems.

I look forward to hearing from you and working with you in the months ahead.

Sincerely,

A handwritten signature in black ink, appearing to read "Kris Kobach", written in a cursive style.

Kris W. Kobach
Vice Chair
Presidential Advisory Commission on Election Integrity

EXHIBIT B



July 3, 2017

The Honorable Adam Miles
Acting Special Counsel
Office of Special Counsel
1730 M Street, NW, Suite 218
Washington, DC 20036

CC:

The Honorable Trey Gowdy
The Honorable Elijah Cummings
Committee on Oversight and Government Reform
United States House of Representatives
Washington, DC 20515

The Honorable Charles E. Grassley
The Honorable Dianne Feinstein
Committee on the Judiciary
United States Senate
Washington, DC 20510

The Honorable Ron Johnson
The Honorable Claire McCaskill
Committee on Homeland Security and Government Affairs
United States Senate
Washington, DC 20510

Dear Mr. Miles,

The Lawyers' Committee for Civil Rights Under Law (the "Lawyers' Committee") respectfully requests that the Office of Special Counsel ("OSC") investigate Kris Kobach for numerous apparent violations of the Hatch Act.

The Lawyers' Committee was founded in 1963 and is committed to full and fair enforcement of federal civil rights laws and ensuring equal justice under law for all. The Lawyers' Committee has been at the forefront of the legal struggle to advance and protect the right to vote, and accordingly it has substantial interest in the recently launched Presidential Advisory Commission on Election Integrity (the "Commission").

Mr. Kobach is a special government employee serving as the Vice Chair of the Commission. He has also announced his candidacy for the 2018 Kansas gubernatorial election. Mr. Kobach has repeatedly exploited his Commission role to promote his candidacy and to

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solicit campaign contributions, including by promoting his campaign through media interviews where Mr. Kobach appeared in his official capacity as a Commission representative.

The Hatch Act may not categorically bar Mr. Kobach from listing his role on the Commission among other biographical details in campaign literature, but his extraordinarily aggressive promotion of his Commission role—including in soliciting campaign donations—far exceeds any such acceptable use. The Lawyers' Committee thus respectfully requests that the OSC assess whether Mr. Kobach's many apparent violations were willful and, if so, the appropriate remedial measures.

Any violation of federal election laws by an official in such a high-profile position would be troubling, but it is especially disturbing that Mr. Kobach appears to have violated the election laws in connection with his leadership on a White House Commission with the stated purpose of ensuring election "integrity."

STATEMENT OF FACTS

The Lawyers' Committee includes below only facts documented in the public record.

1. The Presidential Commission on Election Integrity

President Trump established the Commission by Executive Order on May 11, 2017.¹ The Order declared that the Commission's stated purpose is to "study the registration and voting processes used in Federal elections," and to produce a report to the President on any "laws, rules, policies, activities, strategies, and practices" that affect "the American people's confidence in the integrity of the voting processes in Federal elections."²

The Commission is subject to the Federal Advisory Committee Act and has filed a Charter as required under the Act. The Charter provides that the Vice President will serve as the Chair of the Commission, and the President may appoint up to 15 additional members. Ex. A ¶ 11. The Vice President may select a Vice Chair from among these 15 additional members. *Id.* All members, including the Vice Chair, must be either "regular Government employees" or "Special Government Employees." *Id.*

The same day the President established the Commission, the White House announced the appointment of Kansas Secretary of State Kris Kobach as the Commission's Vice Chair.³ Because Mr. Kobach is not a full-time federal employee, he necessarily holds the status of a special government employee ("SGE") under the Commission's Charter. Ex. A ¶ 11(b).

¹ Exec. Order 13799.

² *Id.* § 3.

³ *President Announces Formation of Bipartisan Presidential Commission on Election Integrity*, May 11, 2017, WhiteHouse.gov, <https://www.whitehouse.gov/the-press-office/2017/05/11/president-announces-formation-bipartisan-presidential-commission>.

2. Mr. Kobach's Candidacy for Governor of Kansas

Mr. Kobach is also a candidate for partisan political office. Mr. Kobach announced his candidacy for Governor of Kansas on June 8, 2017, criticizing the culture of “corruption” and the questionable ethics practices of Kansas lawmakers in his campaign announcement.⁴

3. Mr. Kobach's Use of Commission Role to Promote Candidacy

Mr. Kobach has prominently and repeatedly used his role on the Commission to promote his candidacy for Governor and to solicit campaign contributions. He has done so in multiple settings—including on his campaign website, on his official campaign social media accounts, and in his public appearances.

The bottom of the homepage of Mr. Kobach's campaign website displays the most recent posts on his official campaign Facebook and Twitter pages (described in further detail below). As of July 1, 2017, the posts featured on the campaign homepage related to two television interviews that Mr. Kobach conducted on Fox News and MSNBC on June 30, 2017, both of which focused entirely on Mr. Kobach's work on the Commission. Ex. B. The homepage also solicits campaign donations in multiple locations. *Id.* The “About” page of the campaign website further highlights Mr. Kobach's role on the Commission, stating that “President Trump knows there is no greater leader on these issues, which is why he named Kris to serve as the Vice Chair of the Presidential Commission on Election Integrity.” Ex. C. Again, the page conspicuously solicits campaign donations. *Id.* The “News” page of the website links to just three news stories, each of which centers on Mr. Kobach's work on the Commission. Ex. D. There is a “Contribute” button immediately to the right of the stories, and immediately below that Contribute button the page displays the most recent post on Mr. Kobach's Facebook page (which as of July 3, was an NPR interview Mr. Kobach gave discussing the Commission). *Id.*

Mr. Kobach has similarly promoted his Commission role on his official campaign social media pages. Mr. Kobach's Twitter profile states that the page is “Paid for by Kansas for Kobach,” and the page's banner depicts his campaign logo. Ex. E. His Facebook page displays the same campaign logo. Ex. F. The Twitter and Facebook pages collectively contain at least 40 *different posts* referencing Mr. Kobach's work on the Commission. Exs. G, H. These include three Twitter posts on June 30 promoting or recapping Mr. Kobach's interviews on Fox News and MSNBC that same day, and a June 30 Facebook post embedding video of the Fox News interview. *Id.* Mr. Kobach authored these posts—on his campaign accounts—contemporaneous to the interviews he was conducting as a representative of the Commission.

Mr. Kobach has also described his role on the Commission in campaign appearances. For instance, Mr. Kobach appeared on a local “let's have a beer and talk” television segment the day he launched his campaign. In the course of the interview, he referenced his position as Vice Chair of the Commission and described the work he expected the Commission to perform.⁵

⁴ See <https://www.hayspost.com/2017/06/08/kobach-announces-a-run-for-kansas-governor/> (11:30 mark of video).

⁵ <https://www.youtube.com/watch?v=DV7KDYhTbz4> (25:50 mark of video).

POTENTIAL VIOLATIONS

The Hatch Act prohibits federal employees from using their “official authority or influence for the purpose of . . . affecting the result of an election.”⁶ It is unlawful for federal employees to use their “official title while participating in political activity” or to “[p]ersonally solicit, accept or receive a political contribution from another person.”⁷ OSC has provided guidance on the application of these rules to social media, explaining that federal employees may not “refer[] to their official titles or positions while engaged in political activity *at any time*” — even when using “personal” or other non-governmental social media accounts.⁸

SGEs such as Mr. Kobach are subject to the Hatch Act.⁹ While SGEs, unlike full-time employees, can run for partisan political office, they must maintain strict separation between their candidacy and their federal government service. SGEs cannot use their federal position to promote their candidacy or to solicit funds, and they cannot engage in any political activities while “on duty,” meaning while “representing the [federal] government in an official capacity.”¹⁰

Mr. Kobach appears to have violated these restrictions. He has prominently used his position as Vice Chair of the Commission to promote his candidacy and to solicit campaign funds. Worse yet, he has done so in a clearly calculated fashion on days when he was acting in his capacity as Vice Chair of the Commission. Mr. Kobach promoted his June 30 interviews with Fox News and MSNBC—in which he was indisputably appearing as a representative of the Commission—on his Twitter page in advance. Ex. G. He then provided summaries and video of the Fox News interview on his Twitter and Facebook pages, as well as on his campaign website, shortly after the interview aired. Exs. B, G, H. In so doing, Mr. Kobach made clear that those appearances while acting for the Commission were also in furtherance of his campaign. At the very least, Mr. Kobach turned those interviews into campaign activities by deploying them for his own partisan goals, and in particular, by linking them with solicitations for campaign contributions.

Mr. Kobach’s promotion of these appearances, as well as his numerous other references to his Commission role on his campaign website, on social media, and in public appearances, were all “directed toward the success of a . . . candidate for partisan political office”—himself.¹¹

⁶ 5 U.S.C. § 7323(a)(1).

⁷ 5 C.F.R. § 734.302(b)(1), § 734.303(a).

⁸ *The Hatch Act: Frequently Asked Questions on Federal Employees and the Use of Social Media and Email*, OSC.gov, <https://osc.gov/Pages/The-Hatch-Act-Frequently-Asked-Questions-on-Federal-Employees-and-the-Use-of-Social-Media-and-Email.aspx> (last visited July 1, 2017) (emphases added) [hereinafter “*Hatch Act FAQs*”]; see also Letter from Ana Galino-Marrone to Adam Rappaport (June 5, 2017) (finding Hatch Act violation by White House Director of Social Media Dan Scavino Jr. in use of personal Twitter account).

⁹ 5 C.F.R. § 734.601.

¹⁰ See *id.*; *Hatch Act FAQs*, *supra*.

¹¹ 5 C.F.R. § 734.101.

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CONCLUSION

The Lawyers' Committee respectfully requests that OSC commence an investigation into Mr. Kobach for likely Hatch Act violations. The Lawyers' Committee also respectfully requests that OSC assess whether Mr. Kobach's apparent violations were willful. Mr. Kobach explains on his own campaign website that he served as a senior attorney in the United States Department of Justice for several years, and therefore he surely is aware of the legal requirements under the Hatch Act. Given that awareness, and the sheer number of apparent violations in this case, there are serious questions whether Mr. Kobach knowingly disregarded the law, and the appropriate disciplinary measures if he did. In Mr. Kobach's own words, "respect for rule of law [is] essential to our country."¹²

Sincerely,

/s/Kristen Clarke

Kristen Clarke

Jon Greenbaum

Ezra Rosenberg

Marcia Johnson-Blanco

Lawyers' Committee for Civil Rights Under Law

John A. Freedman

Robert N. Weiner

R. Stanton Jones

Daniel F. Jacobson

ARNOLD & PORTER KAYE SCHOLER

Counsel for the Lawyers' Committee for Civil

Rights Under Law

¹² Timothy McLaughlin, *Trump voter fraud official announces bid for Kansas governor*, June 8, 2017, <http://www.reuters.com/article/us-kansas-governor-idUSKBN18Z2X8>

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ELECTRONIC PRIVACY INFORMATION
CENTER,

Plaintiff,

v.

PRESIDENTIAL ADVISORY
COMMISSION ON ELECTION
INTEGRITY, *et al.*,

Defendants.

Civil Action No. 1:17-cv-1320 (CKK)

DECLARATION OF CHARLES CHRISTOPHER HERNDON

I, Charles C. Herndon, declare as follows:

1. I am the Director of White House Information Technology (“WHIT”) and Deputy Assistant to the President. I am the senior officer responsible for the information resources and information systems provided to the President, Vice President and Executive Office of the President. I report to White House Deputy Chief of Staff for Operations and Assistant to the President, and through him to the Chief of Staff and the President. I am part of what is known as the White House Office. This declaration is based on my personal knowledge and upon information provided to me in my official capacity.

2. A number of components make up the Executive Office of the President, including the White House Office (also referred to as the Office of the President). Components of the White House Office include the President’s immediate staff, the White House Counsel’s Office and the Staff Secretary’s Office. The White House Office serves the President in the performance of the many detailed activities incident to his immediate office, and the various

Assistants and Deputy Assistants to the President aid the President in such matters as he may direct. My role is to ensure the effective use of information resources and systems to the President. I am also a member of the Executive Committee for Presidential Information Technology, as established in the March 19, 2015, Presidential Memorandum creating my position. See, <https://obamawhitehouse.archives.gov/the-press-office/2015/03/19/presidential-memorandum-establishing-director-white-house-information-te>. The Executive Committee is chaired by the Deputy Chief of Staff Operations.

3. I was asked by the Office of the Vice President to assist in creating a mechanism by which data could be securely loaded and stored within the White House computer systems. To do that I repurposed an existing system that regularly accepts personally identifiable information through a secure, encrypted computer application within the White House Information Technology system.

4. States that wish to provide information to the Presidential Advisory Commission on Election Integrity (“Commission”) can email the Commission to request an access link. Once a staff member verifies the identity of the requester and the email address, a one-time unique uniform resource locator (“URL”) link will be emailed to that state representative. Data can be uploaded via that one-time link to a server within the domain electionintegrity.whitehouse.gov. Authorized members of the Commission will be given access to the file directory identified to house the uploaded information. Once the files have been uploaded, there is no further transfer of the data from that location. The technology is similar to a shared folder in Microsoft SharePoint.

5. The Commission will receive dedicated laptops, which can access the data provided by states through the White House network over an SSL (Secure Sockets Layer)


connection. The SSL connection ensures that all data passed between the web server and browsers remain private and secure. The laptops use Personal Identity Verification (PIV) and the data at rest is encrypted.

6. The Executive Committee for Information Technology will have no role in this data collection process. The U.S. Digital Service (which is within the Office of Management and Budget) will also have no role, nor will any federal agency. The only people who will assist are a limited number of my technical staff from the White House Office of Administration. They will have access to the data, but all access will be logged and recorded by our network monitoring tools.

7. I can confirm, based on information provided to me from the Department of Defense, that the data the state of Arkansas uploaded to the Army's SAFE site has been deleted without ever having been accessed by the Commission.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 16th day of July 2017.



Charles C. Herndon

Digitally signed by CHARLES HERNDON
DN: c=US, o=U.S. Government, ou=Executive Office
of the President, cn=CHARLES HERNDON,
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Date: 2017.07.17 06:36:16 -04'00'