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**AGENDA DOCUMENT NO. 15-51-A**  
**AGENDA ITEM**  
**For meeting of October 1, 2015**  
**SUBMITTED LATE**

September 30, 2015

**MEMORANDUM**

TO: The Commission

FROM: Daniel A. Petalas *DAP*  
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Subject: AO 2015-08 (Repledge) Draft A

Attached is a proposed draft of the subject advisory opinion.

Members of the public may submit written comments on the draft advisory opinion. We are making this draft available for comment until 9:30 am (Eastern Time) on October 1, 2015.

Members of the public may also attend the Commission meeting at which the draft will be considered. The advisory opinion requestor may appear before the Commission at this meeting to answer questions.

For more information about how to submit comments or attend the Commission meeting, go to <http://www.fec.gov/law/draftaos.shtml>.

Attachment

1 ADVISORY OPINION 2015-08

2 Mr. Eric Zolt  
3 546 South Rimpau Boulevard  
4 Los Angeles, CA 90020

**DRAFT A**

5 Dear Mr. Zolt:

6 We are responding to your advisory opinion request on behalf of Repledge  
7 concerning the application of the Federal Election Campaign Act, 52 U.S.C. §§ 30101-  
8 30146 (the “Act”), and Commission regulations to Repledge’s proposal to process  
9 contributions made through its website.<sup>1</sup> The Commission concludes that Repledge may  
10 conduct the proposed activities as described in its request and that Repledge would not be  
11 required to file reports with the Commission regarding the proposed activities.

12 ***Background***

13 The facts presented in this advisory opinion are based on your letter received on  
14 August 6, 2015, and your email received on August 19, 2015.

15 Repledge is a for-profit corporation that you founded with two colleagues.  
16 Repledge intends to establish a web-based platform as “a virtual meeting place,” through  
17 which supporters of opposing federal candidates can agree to give money to charity  
18 instead of making contributions to the candidates they support. Advisory Opinion  
19 Request at AOR001. Specifically, the platform will allow individuals who register as  
20 Repledge “members” to pledge money to a federal candidate while at the same time  
21 designating a charity to receive the funds if the pledge is “matched” by supporters of the  
22 opposing candidate. For example, if Repledge members pledge \$1000 to Candidate X

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<sup>1</sup> Repledge previously submitted an advisory opinion request with respect to the same proposed activity, Advisory Opinion Request 2012-08 (Repledge), but the Commission was unable to approve a response to that request by the required four affirmative votes. See 52 U.S.C. §§ 30106(c), 30107(a)(7); 11 C.F.R. § 112.4(a). Public documents relating to Advisory Opinion Request 2012-08 (Repledge) are available on the Commission’s website.

1 and \$700 to her opponent Candidate Y (for total pledges of \$1700), then \$1400 (the  
2 amount of matched pledges) will be donated to charities of the members' choice, \$300  
3 (the amount of unmatched pledges) will be contributed to Candidate X, and \$0 will be  
4 contributed to Candidate Y.

5 Repledge proposes to establish its platform with respect to the two major party  
6 nominees in the 2016 presidential election. Repledge states that it will operate in a  
7 nonpartisan manner and will not advocate the election or defeat of these or any other  
8 federal candidates or support or oppose any political party.

9 Repledge will operate through "fund drives." Fund drives will be open to all  
10 members and are expected to last from seven to fourteen days. During each fund drive,  
11 members will make pledges to their preferred candidates and charities by entering their  
12 credit card information through a payment processor, such as PayPal or WePay, and  
13 indicating the amounts pledged. The payment processor will "pre-approve" — that is,  
14 will place a hold on — the amounts pledged and will charge the members' credit cards  
15 after the fund drive. AOR002 n.2. Once pledges are pre-approved, members will not be  
16 able to rescind them. AOR012.

17 After the payment processor charges the members' credit cards for the pledged  
18 amounts, Repledge will inform the payment processor how to allocate the funds (less the  
19 processor's fee, which the processor will deduct from the charged amounts) among the  
20 recipient charities and candidates based on the amounts of matched and unmatched  
21 pledges. No later than 10 days after the fund drive, the payment processor will set up a  
22 unique account for each recipient and will notify each recipient that it may withdraw the  
23 funds from its respective account.

1           Repledge will associate individual contributors with the transmitted amounts  
2 based on the percentage of candidate pledges that go unmatched. For example, if 10  
3 members each pledge \$100 to Candidate X (for a total of \$1000), and 20 members each  
4 pledge \$20 to Candidate Y (for a total of \$400), then 60% (\$600 out of \$1000) of the  
5 pledges to Candidate X will have gone unmatched. Thus, 60% of each individual's  
6 pledge to Candidate X (net of fees) will be contributed to Candidate X, and the remaining  
7 40% of each pledge to Candidate X — and 100% of the pledges to candidate Y — will be  
8 donated to the members' designated charities.

9           Aside from agreements that might be necessary to effectuate the transfer of funds  
10 after fund drives, Repledge will not enter any contractual relationships with recipient  
11 political committees. The funds transferred as contributions or charitable donations will  
12 not be deposited in, or pass through, accounts established or maintained by Repledge.  
13 Repledge will disclose to its participating members and to the recipients of pledged funds  
14 all transaction and processing fees and the amounts distributed to the respective charities  
15 and political committees.

16           Repledge states that it will deduct a commercially reasonable percentage-based  
17 transaction fee from each pledge. The fee will be set at a percentage to cover operating  
18 costs and generate a reasonable profit. Repledge currently estimates the fee at one  
19 percent each pledge.

20           Repledge states that it will inform its members about the contribution limits  
21 established by the Act and will not allow members to pledge funds in excess of those  
22 limits. Repledge will also require each member to confirm before pledging funds that he

1 or she may lawfully make a contribution.<sup>2</sup> Finally, Repledge will require each member to  
2 provide the member's name, mailing address, name of employer, and occupation, and  
3 Repledge will provide this information to recipients of contributions.<sup>3</sup>

4 ***Questions Presented***

5 1. *Would a monetary pledge from a member to a federal political committee and*  
6 *charity, which pledge is pre-approved by a third-party payment processor, charged to a*  
7 *member's credit card, and which eventually results in a contribution to a federal*  
8 *committee or a donation to charity (depending on whether the pledge is matched by a*  
9 *supporter of an opposing candidate or party), constitute a "contribution" under*  
10 *52 U.S.C. § 30101(8), subject to the 10-day forwarding requirement established by*  
11 *11 C.F.R. § 102.8(a) at the time the pledge is made?*

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<sup>2</sup> Repledge will require each member to check a box on the website to confirm that the following statements are true and accurate:

1. I am a United States citizen or a lawfully admitted permanent resident of the United States.
2. This contribution is not made from the general treasury funds of a corporation, labor organization or national bank.
3. This contribution is not made from the treasury of an entity or person who is a federal contractor.
4. This contribution is not made from the funds of a political action committee.
5. This contribution is not made from the funds of an individual registered as a federal lobbyist or a foreign agent, or an entity that is a federally registered lobbying firm or foreign agent.
6. I am not a minor under the age of 16.
7. The funds I am donating are not being provided to me by another person or entity for the purpose of making this contribution.

<sup>3</sup> The Repledge website will explain that:

Candidates and committees registered with the Federal Election Commission are required to use their best efforts to collect and report the name, address, employer and occupation of all individuals whose contributions to a federal committee exceed \$200 in an election cycle. We require you to enter this information so that we can provide it to those recipients of your contributions. This helps ensure that your contribution will be accepted.

1 2. *Would Repledge’s processing and forwarding of members’ contributions to*  
2 *federal committees result in impermissible corporate contributions from Repledge to*  
3 *those committees under 52 U.S.C. § 30118?*

4 3. *Would Repledge’s processing and forwarding of members’ contributions to*  
5 *federal committees violate the prohibition on a corporation “acting as a conduit for*  
6 *contributions earmarked to candidates” in 11 C.F.R. § 110.6(b)(2)(ii) or any federal*  
7 *campaign finance law or restriction?*

8 4. *Would Repledge’s receipt of a small percentage-based transaction fee constitute*  
9 *the receipt of a “contribution” by Repledge under 52 U.S.C. § 30101(8)?*

10 5. *Would a Repledge member’s payment of a small percentage-based transaction fee*  
11 *to Repledge and/or its payment processor constitute a contribution to the recipient*  
12 *political committee?*

13 6. *Would a Repledge member’s contributions to federal committees subject*  
14 *Repledge to any reporting requirements of the Act or Commission regulations, including*  
15 *but not limited to the “conduit and intermediary” reporting requirements established by*  
16 *11 C.F.R. § 110.6(c)?*

17 ***Legal Analysis and Conclusions***

18 1. *Would a monetary pledge from a member to a federal political committee and*  
19 *charity, which pledge is pre-approved by a third-party payment processor, charged to a*  
20 *member’s credit card, and which eventually results in a contribution to a federal*  
21 *committee or a donation to charity (depending on whether the pledge is matched by a*  
22 *supporter of an opposing candidate or party), constitute a “contribution” under*

1 *52 U.S.C. § 30101(8), subject to the 10-day forwarding requirement established by*  
2 *11 C.F.R. § 102.8(a) at the time the pledge is made?*

3 No, a monetary pledge from a member to a federal political committee and charity  
4 would not constitute a “contribution” at the time of the pledge and therefore would not be  
5 subject to the 10-day forwarding requirement established by 52 U.S.C. § 30102(b)(1) .

6 Under the Act and Commission regulations, a “contribution” includes “any gift,  
7 subscription, loan, advance, or deposit of money or anything of value made by any  
8 person for the purpose of influencing any election for Federal office.” 52 U.S.C.  
9 § 30101(8)(A)(i); 11 C.F.R. § 100.52(a). The Act provides that “[e]very person who  
10 receives a contribution for an authorized political committee shall, no later than 10 days  
11 after receiving such contribution, forward to the treasurer such contribution.” 52 U.S.C.  
12 § 30102(b)(1); *see also* 11 C.F.R. § 102.8(a).

13 The Commission has previously recognized that a mere pledge to make a  
14 contribution is not itself a contribution. Prior to 1980, the Act defined “contribution” to  
15 include “a written contract, promise, or agreement, whether or not legally enforceable.”  
16 2 U.S.C. § 431(e)(2) (1976); *see also* 11 C.F.R. § 100.4(a)(3) (1977). In the 1979  
17 amendments to the Act, however, Congress removed that language from the definition of  
18 “contribution.” *See generally* Amendments to Federal Election Campaign Act of 1971,  
19 Pub. L. No. 96-187, 93 Stat. 1339 (1979). The Commission has explained that “[t]he  
20 effect of [this] repeal is that a mere promise to make a contribution is not by itself subject  
21 to the Act as a contribution.” Advisory Opinion 1985-29 (John Breaux Committee) at 4  
22 n.4. Thus, in Advisory Opinion 1985-29 (John Breaux Committee), the Commission  
23 determined that an “unsecured promise” to pay interest on a loan to a candidate

1 committee was not a contribution, although “any actual payment of interest” would be a  
2 contribution. *Id.* at 3; *see also* Advisory Opinion 1990-14 (AT&T *et al.*) at 7 (noting that,  
3 unlike presentment of credit card that legally obligates cardholder to make payment,  
4 “mere[] pledge[] to make a contribution” in telephone call is not contribution because  
5 caller is not “strictly obligated” to transmit funds).

6 Accordingly, a member of Repledge will not make a contribution to a political  
7 committee merely by pledging funds during a fund drive. A member’s pledge represents  
8 only a conditional promise to make a contribution to a candidate, depending on whether  
9 and to what extent the amount pledged is matched by other members’ pledges to the  
10 opposing candidate.

11 Because a pledge under Repledge’s proposal is not a contribution under 52 U.S.C.  
12 § 30101(8), the pledge is not subject to the forwarding requirement of 52 U.S.C.  
13 § 30102(b).

14 2. *Would Repledge’s processing and forwarding of members’ contributions to*  
15 *federal committees result in impermissible corporate contributions from Repledge to*  
16 *those committees under 52 U.S.C. § 30118?*

17 No, Repledge’s processing and forwarding of members’ contributions to political  
18 committees would not result in impermissible corporate contributions from Repledge to  
19 recipient committees.

20 The Act and Commission regulations prohibit corporations from making a  
21 contribution in connection with a Federal election. *See* 52 U.S.C. § 30118(a); 11 C.F.R.  
22 § 114.2(b)(1). A “contribution” includes any “direct or indirect payment, distribution,  
23 loan, advance, deposit, or gift of money, or any services, or anything of value . . . to any



1 candidate, campaign committee, or political party or organization, in connection with any  
2 [federal] election.” 52 U.S.C. § 30118(b)(2); 11 C.F.R. § 114.2(b)(1); *see also* 52 U.S.C.  
3 § 30101(8)(A)(i); 11 C.F.R. § 100.52(a). “Anything of value” includes in-kind  
4 contributions, such as the provision of goods or services without charge or at a charge  
5 that is less than the usual and normal charge. *See* 11 C.F.R. § 100.52(d)(1). Commission  
6 regulations define “usual and normal charge” as the price of goods in the market from  
7 which they ordinarily would have been purchased at the time of the contribution, or the  
8 commercially reasonable rate prevailing at the time the services were rendered.” *See* 11  
9 C.F.R. § 100.52(d)(2).

10       The Commission has previously concluded that entities that process contributions  
11 as a service to contributors are not making contributions because the entities are not  
12 providing any services to the recipient political committees. *See, e.g.*, Advisory Opinion  
13 2014-07 (Crowdpac) at 6 (distinguishing between companies that process contributions  
14 as service to contributors and companies that process contributions as service to recipient  
15 political committees); Advisory Opinion 2012-22 (skimmerhat) at 4-6 (same); Advisory  
16 Opinion 2011-19 (GivingSphere) at 7 (same); Advisory Opinion 2011-06 (Democracy  
17 Engine) at 5 (same).

18       Here, as in prior advisory opinions, Repledge is a commercial entity that proposes  
19 to develop a web-based platform through which its customers can make contributions to  
20 political committees. Like prior requestors, Repledge will provide services only “at the  
21 request and for the benefit of the contributors, not of the recipient political committees,”  
22 and will charge a transaction fee that will cover its costs and provide it with a profit.

23       Advisory Opinion 2007-04 (Atlatl) at 6; *see also* Advisory Opinion 2011-06 (Democracy

1 Engine) at 5. Also like those requestors, Repledge members' funds will be transmitted  
2 only at their own request and not pursuant to agreements with political committees.  
3 Repledge will not contract with recipient political committees, except possibly for the  
4 limited purpose of effectuating authorized fund transfers. *See* Advisory Opinion 2011-06  
5 (Democracy Engine) at 5.<sup>4</sup>

6 Accordingly, Repledge's processing and forwarding of its members' contributions  
7 to political committees would not result in impermissible corporate contributions from  
8 Repledge to the recipient committees.

9 3. *Would Repledge's processing and forwarding of members' contributions to*  
10 *federal committees violate the prohibition on a corporation "acting as a conduit for*  
11 *contributions earmarked to candidates" in 11 C.F.R. § 110.6(b)(2)(ii) or any federal*  
12 *campaign finance law or restriction?*

13 No, Repledge's processing and forwarding of members' contributions to federal  
14 committees would not violate the prohibition on a corporation "acting as a conduit for  
15 contributions earmarked to candidates" in 11 C.F.R. § 110.6(b)(2)(ii).

16 For purposes of the contribution limitations, "all contributions made by a person,  
17 . . . including contributions which are in any way earmarked or otherwise directed  
18 through an intermediary or conduit to such candidate," are treated as contributions from

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<sup>4</sup> Repledge's proposed service differs from those previously approved by the Commission in two ways. First, Repledge will process and transmit contributions (at least initially) only to a limited universe of candidate recipients (specifically, the major party nominees in the 2016 presidential election). *Compare* Advisory Opinion 2011-06 (Democracy Engine) at 2 (approving proposed website that enabled contributions to listed political committees and would add any committee to list on request). Second, the ultimate amount a member contributes to the candidate of their choosing will depend in part on the actions of other members — specifically, how much the other members pledge to that candidate's opponent. These two features of Repledge's service do not affect its permissibility under the Act or Commission regulations because they do not alter the fact that Repledge will be providing a service to the contributors and not the recipient political committees.

1 the person to the candidate. 52 U.S.C. § 30116(a)(8). “Earmarked” means “a  
2 designation, instruction, or encumbrance, whether direct or indirect, express or implied,  
3 oral or written, which results in all or any part of a contribution . . . being made to . . . a  
4 clearly identified candidate.” 11 C.F.R. § 110.6(b)(1). A “conduit or intermediary” is  
5 “any person who receives and forwards an earmarked contribution to a candidate.”  
6 11 C.F.R. § 110.6(b)(2).

7       Persons prohibited from making contributions and expenditures are prohibited  
8 from being conduits or intermediaries. 11 C.F.R. § 110.6(b)(2)(ii). Because corporations  
9 may not make contributions to candidate committees, *see* 52 U.S.C. § 30118, they may  
10 not permissibly serve as conduits.

11       The Commission has recognized, however, that “certain electronic transactional  
12 services that assist a contributor in making a contribution” – even when provided by a  
13 corporation – “do not run afoul of the prohibition on corporations acting as a conduit or  
14 intermediary for earmarked contributions” because they are “so essential to the flow of  
15 modern commerce . . . .” Advisory Opinion 2012-22 (skimmerhat) at 10 (internal  
16 quotations omitted).

17       As noted above, Repledge is a corporate, commercial entity that proposes to  
18 establish a web-based platform that its customers can voluntarily choose to employ to  
19 make contributions to political committees. Its processing of member contributions is  
20 exactly the type of electronic transactional service that is essential to the flow of modern  
21 commerce and that does not run afoul of the regulatory prohibition on corporations acting  
22 as a conduit. Advisory Opinion 2012-22 (skimmerhat) at 10 (internal quotations  
23 omitted). Therefore, “contributions made through the [Repledge] platform are not

1 contributions to an intermediary and earmarked for a candidate or authorized committee;  
2 they are direct contributions to the candidate . . . made via a commercial processing  
3 service.” *Id.*

4 Accordingly, Repledge’s processing and forwarding of members’ contributions to  
5 federal committees would not violate the prohibition on a corporation “acting as a  
6 conduit for contributions earmarked to candidates” in 11 C.F.R. § 110.6(b)(2)(ii).

7 4. *Would Repledge’s receipt of a small percentage-based transaction fee constitute*  
8 *the receipt of a “contribution” by Repledge under 52 U.S.C. § 30101(8)?*

9 5. *Would a Repledge member’s payment of a small percentage-based transaction fee*  
10 *to Repledge and/or its payment processor constitute a contribution to the recipient*  
11 *political committee?*

12 No, Repledge’s receipt of a transaction fee would not constitute the receipt of  
13 contributions by Repledge. Nor would a Repledge member’s payment of a transaction  
14 fee to Repledge or its payment processor constitute contributions to the recipient political  
15 committee.

16 As noted above, a “contribution” includes “any gift . . . of money or anything of  
17 value made by any person for the purpose of influencing any election for Federal office.”  
18 52 U.S.C. § 30101(8)(A)(i); 11 C.F.R. § 100.52(a); *see also* 52 U.S.C. § 30118(b)(2);  
19 11 C.F.R. § 114.2(b)(1). “Anything of value” includes in-kind contributions, such as the  
20 provision of services without charge or at a charge that is less than the usual and normal  
21 charge. *See* 11 C.F.R. § 100.52(d)(1). Thus, the question presented here is whether a  
22 Repledge member’s payment of fees for the processing of a contribution to a political

1 committee constitutes either a monetary contribution to Repledge under section 100.52(a)  
2 or an in-kind contribution to the recipient committee under section 100.52(d).

3 As discussed above, Repledge will provide payment-processing services to its  
4 members. Like any other commercial payment processor or delivery service, Repledge  
5 proposes to charge its members fees for providing its services. According to the request,  
6 Repledge's fees are intended to be commercially reasonable, to cover its operating costs,  
7 and to generate a reasonable profit. Repledge will charge the same fees regardless of  
8 whether its members' pledges ultimately result in contributions to a federal candidate or  
9 donations to charity. Thus, as the Commission has concluded in prior advisory opinions,  
10 the fees that Repledge's members will pay are not contributions to Repledge because they  
11 are not gifts or donations to Repledge but, rather, commercial payments in exchange for  
12 its processing services. *See, e.g.,* Advisory Opinion 2012-22 (skimmerhat) at 6; Advisory  
13 Opinion 2011-06 (Democracy Engine) at 6; *see also* Advisory Opinion 2006-08 (Brooks)  
14 at 4.

15 Nor would the fees paid to Repledge be contributions to recipient political  
16 committees. Because these fees "are [to pay] for services rendered 'for the benefit of the  
17 contributors, not of the recipient political committees,' such fees '[do] not relieve the  
18 recipient political committees of a financial burden they would otherwise have had to pay  
19 for themselves.'" Advisory Opinion 2014-07 (Crowdpac) at 6 (quoting Advisory  
20 Opinion 2012-22 (skimmerhat)); Advisory Opinion 2011-06 (Democracy Engine)  
21 (internal quotations omitted). In other words, the contributors' fees will not result in  
22 recipient political committees receiving Repledge's payment-processing services at less  
23 than the usual rate because Repledge is not providing those services to the committees in

1 the first instance. Thus, the members' fee payments are not in-kind contributions to the  
2 recipient committees.

3 6. *Would a Repledge member's contributions to federal committees subject*  
4 *Repledge to any reporting requirements of the Act or Commission regulations, including*  
5 *but not limited to the "conduit and intermediary" reporting requirements established by*  
6 *11 C.F.R. § 110.6(c)?*

7 No, a Repledge member's contributions to federal committees will not subject  
8 Repledge to any reporting requirements under the Act or Commission regulations,  
9 including the "conduit and intermediary" reporting requirements established by 11 C.F.R.  
10 § 110.6(c).

11 The Act and Commission regulations require certain persons to file reports with  
12 the Commission. For example, a "treasurer of a political committee shall file reports of  
13 receipts and disbursements." *See* 52 U.S.C. § 30104(a)(1); 11 C.F.R. § 104.1. Persons  
14 who spend more than certain amounts on independent expenditures or electioneering  
15 communications must also file reports with the Commission, *see* 52 U.S.C. § 30104(c),  
16 (f); 11 C.F.R. §§ 104.20, 109.10, as must persons acting as conduits or intermediaries for  
17 earmarked contributions, 11 C.F.R. § 110.6(c).

18 Repledge's proposed activities would not subject it to the reporting requirements  
19 of the Act and Commission regulations. First, Repledge states that it will not expressly  
20 advocate the election or defeat of any candidate, so it will not be subject to the reporting  
21 requirements for persons making independent expenditures. *See* 52 U.S.C. § 30101(17)  
22 ("The term 'independent expenditure' means an expenditure by a person . . . expressly  
23 advocating the election or defeat of a clearly identified candidate . . ."); *see also* 11

1 C.F.R. § 100.16(a). Second, Repledge is a commercial service provider, not a political  
2 committee, and therefore it is not subject to the reporting requirements for political  
3 committees. *See* 52 U.S.C. § 30104(a)(1); 11 C.F.R. § 104.1. Third, as explained in the  
4 response to Question 3 above, Repledge will not act as a conduit or intermediary under  
5 11 C.F.R. § 110.6. Finally, the request does not indicate that Repledge will make  
6 electioneering communications, *see* 52 U.S.C. § 30104(f)(3)(A)(i), or engage in any other  
7 activities that would subject it to the reporting requirements of the Act and Commission  
8 regulations.

9 This response constitutes an advisory opinion concerning the application of the  
10 Act and Commission regulations to the specific transaction or activity set forth in this  
11 advisory opinion request. *See* 52 U.S.C. § 30108. The Commission emphasizes that, if  
12 there is a change in any of the facts or assumptions presented, and such facts or  
13 assumptions are material to a conclusion presented in this advisory opinion, then the  
14 requestor may not rely on that conclusion as support for her proposed activity. Any  
15 person involved in any specific transaction or activity which is indistinguishable in all its  
16 material aspects from the transaction or activity with respect to which this advisory  
17 opinion is rendered may rely on this advisory opinion. *See* 52 U.S.C. § 30108(c)(1)(B).  
18 Please note that the analysis or conclusions in this advisory opinion may be affected by

1 subsequent developments in the law including, but not limited to, statutes, regulations,  
2 advisory opinions, and case law. Any advisory opinions cited herein are available on the  
3 Commission's website.

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On behalf of the Commission,

Ann M. Ravel  
Chair