UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

)
CAMPAIGN LEGAL CENTER, et al.,)
Plaintiffs,)
v.)
FEDERAL ELECTION COMMISSION,)
Defendant,)
F8, LLC, et al.,)
Intervenor-Defendants.)

Civ. No. 16-752 (JDB)

CERTIFIED LIST OF CONTENTS OF ADMINISTRATIVE RECORD

DEFENDANT FEDERAL ELECTION COMMISSION'S CERTIFIED LIST OF CONTENTS OF THE ADMINISTRATIVE RECORD IN MUR 6711

The Federal Election Commission ("FEC" or "Commission"), by its Secretary and Clerk, hereby certifies that the documents listed below constitute the administrative record in Matter Under Review ("MUR") 6711. The pages, beginning with the prefix "AR," have been sequentially numbered beginning with AR0301 (for ease of reference given this action's inclusion of three administrative records) and running through AR0552. For documents that are also part of the Administrative Record in MUR 6487, the index below references the AR pages that correspond to the document as identified in the concurrently filed Certified List of Contents of the Administrative Record in MUR 6487.

- 1.Administrative Complaint (dated Dec. 20, 2012).AR0301-11
- Letter from Jeff Jordan, Supervisory Attorney, FEC Complaints AR0312 Examination & Legal Administration, to J. Gerald Herbert of Complainant Campaign Legal Center (date-stamped Jan. 2, 2013) (acknowledging receipt of administrative complaint) and

Enclosure^{*} (description of FEC procedures for handling complaints).

- Letter from Jeff Jordan, Supervisory Attorney, FEC Complaints AR0313
 Examination & Legal Administration, to Fred Wertheimer of Complainant Democracy 21 (date-stamped Jan. 2, 2013) (acknowledging receipt of administrative complaint) and Enclosure* (description of FEC procedures for handling complaints).
- Letter from Jeff Jordan, Supervisory Attorney, FEC Complaints AR0314-15 Examination & Legal Administration, to William S. Rose, Jr., Specialty Investments Group (date-stamped Jan. 2, 2013) (advising of receipt of administrative complaint) and Enclosure* (copy of Administrative Complaint included at AR0301-11, description of FEC procedures for handling procedures for handling complaints, and Designation of Counsel form).
- 5. Letter from Jeff Jordan, Supervisory Attorney, FEC Complaints AR0316-17 Examination & Legal Administration, to William S. Rose, Jr., Kingston Pike Development LLC (date-stamped Jan. 2, 2013) (advising of receipt of administrative complaint) and Enclosure* (copy of Administrative Complaint included at AR0301-11, description of FEC procedures for handling procedures for handling complaints, and Designation of Counsel form).
- 6. Letter from Jeff Jordan, Supervisory Attorney, FEC Complaints AR0318-19 Examination & Legal Administration, to William S. Rose, Jr. (date-stamped Jan. 2, 2013) (advising of receipt of administrative complaint) and Enclosure* (copy of Administrative Complaint included at AR0301-11, description of FEC procedures for handling procedures for handling complaints, and Designation of Counsel form).
- 7. Letter from Jeff Jordan, Supervisory Attorney, FEC Complaints AR0320-21 Examination & Legal Administration, to Ryan Hecker, Treasurer, FreedomWorks for America ("FWFA") (date-stamped Jan. 2, 2013) (advising of receipt of administrative complaint) and Enclosure* (copy of Administrative Complaint included at AR0301-11, description of FEC procedures for handling

^{*} Enclosures and attachments identified with an asterisk are not included in the administrative record.

procedures for handling complaints, and Designation of Counsel form).

- Letter from J. Gerald Herbert of Complainant Campaign Legal AR0322-28 Center and Fred Wertheimer of Complainant Democracy 21 to Anthony Herman, then-General Counsel, Federal Election Commission (dated Jan. 3, 2013) (attaching supplemental material to administrative complaint) and Attachment (news article).
- Letter from William J. McGinley, Counsel to FWFA, and Ryan AR0329-30 Hecker, Treasurer of FWFA, to Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division (dated Jan. 16, 2013) (requesting extension of time to respond to administrative complaint) and Enclosure (completed Designation of Counsel form).
- Letter from Kim Collins, Paralegal, FEC Complaints Examination AR0331 & Legal Administration Division, to William J. McGinley, Counsel to FWFA and Ryan Hecker, Treasurer of FWFA (dated Jan. 17, 2013) (granting extension of time).
- Email from Kenneth A. Gross, counsel to William S. Rose, Jr., AR0332-35
 Kingston Pike Development, LLC, and Specialty Investments
 Group, to Kim Collins, Paralegal, FEC Complaints Examination
 & Legal Administration Division, with a copy to Gregory B.
 Craig (dated Jan. 23, 2013) (requesting extension of time to
 respond to administrative complaint) and Attachments (completed
 Designation of Counsel forms).
- Letter from Kim Collins, Paralegal, FEC Complaints Examination AR0336 & Legal Administration Division, to Kenneth A. Gross and Gregory Craig, Counsel to William Rose, Kingston Pike Development LLC, and Specialty Investment Group (dated Jan. 24, 2013) (granting extension of time).
- Response of FWFA and Ryan Hecker, Treasurer of FWFA, to the AR0337-38 Administrative Complaint (submitted by William J. McGinley and Benjamin D. Wood, Counsel to FWFA and Ryan Hecker, Treasurer of FWFA) (dated Feb. 14, 2013).

14.	Response of William S. Rose, Jr., Specialty Investments Group, Inc., and Kingston Pike Development, LLC to the Administrative Complaint (Letter from Kenneth A. Gross and Gregory Craig, Counsel to William S. Rose, Jr., Specialty Investments Group, Inc., and Kingston Pike Development, LLC, to Anthony Herman, General Counsel, FEC (dated Feb. 25, 2013)).	AR0339-42
15.	Amended Administrative Complaint (dated Apr. 23, 2013) and Attachment [*] (article included at AR0324-28).	AR0343-48
16.	Letter from Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to Fred Wertheimer of Complainant Democracy 21 (date-stamped Apr. 25, 2013) (acknowledging receipt of amendment to administrative complaint).	AR0349
17.	Letter from Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to J. Gerald Herbert of Complainant Campaign Legal Center (date- stamped Apr. 25, 2013) (acknowledging receipt of administrative complaint).	AR0350
18.	Letter from Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to Adam Brandon, Executive Vice President, FWFA (date-stamped Apr. 25, 2013) (notification of administrative complaint) and Enclosures [*] (amended administrative complaint and attachment included at AR0343-48 and AR0324-28, respectively, initial administrative complaint included at AR0301-11, description of FEC procedures for handling complaints, and designation of counsel form).	AR0351-52
19.	Letter from Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to Richard J. Stephenson, Member of Board of Directors, FWFA (date-stamped Apr. 25, 2013) (notification of administrative complaint) and Enclosures [*] (amended administrative complaint and attachment included at AR0343-48 and AR0324-28, respectively, initial administrative complaint included at AR0301- 11, description of FEC procedures for handling complaints, and designation of counsel form).	AR0353-54

20.	Letter from Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to Kenneth A. Gross, Counsel for William S. Rose, Jr., Kingston Pike Development, LLC, and Specialty Investments Group, Inc. (date-stamped Apr. 25, 2013) (notification of additional information concerning the administrative complaint) and Enclosure [*] (amended administrative complaint and attachment included at AR0343-48 and AR0324-28, respectively).	AR0355
21.	Letter from Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to William J. McGinley, Counsel for FWFA and Ryan Hecker, Treasurer of FWFA (date-stamped Apr. 25, 2013) (notification of additional information concerning the administrative complaint) and Enclosure [*] (amended administrative complaint and attachment included at AR0343-48 and AR0324-28, respectively).	AR0356
22.	Letter from William J. McGinley, Counsel for FWFA, to Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division (dated May 1, 2013) (requesting extension of time to respond to the amended administrative complaint).	AR0357
23.	Letter from Kim Collins, Paralegal, FEC Complaints Examination & Legal Administration Division, to William J. McGinley, Counsel for FWFA (dated May 1, 2013) (notifying that requested extension of time was granted).	AR0358
24.	Letter from George J. Terwilliger, III, Counsel for Richard J. Stephenson, to Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division (dated May 9, 2013) (requesting extension of time to respond to the amended administrative complaint) and Enclosure (completed Designation of Counsel form).	AR0359-61
25.	Letter from Heidi K. Abegg, Counsel for Adam Brandon, to Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division (dated May 10, 2013) (requesting extension of time to respond to the administrative complaint) and Enclosure (completed Designation of Counsel form).	AR0362-63

26.	Letter from Kim Collins, Paralegal, FEC Complaints Examination & Legal Administration Division, to Heidi K. Abegg, Counsel for Adam Brandon (dated May 10, 2013) (granting extension of time).	AR0364
27.	Letter from Kim Collins, Paralegal, FEC Complaints Examination & Legal Administration Division, to George J. Terwilliger, III and Matthew S. Miner, Counsel for Richard J. Stephenson (dated May 10, 2013) (granting extension of time).	AR0365
28.	Completed Designation of Counsel form from Brian A. Benczkowski, Counsel for Adam Brandon (dated May 24, 2013).	AR0366
29.	Letter from Brian A. Benczkowski, Counsel for Adam Brandon, to Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division (dated June 11, 2013) (requesting extension of time to respond to the administrative complaint).	AR0367
30.	Completed Designation of Counsel form from William J. McGinley, <i>et al.</i> , Counsel for FWFA and R. Russ Walker, Treasurer of FWFA (dated June 12, 2013).	AR0368
31.	Letter from Kim Collins, Paralegal, FEC Complaints Examination & Legal Administration Division, to Brian A. Benczkowski, Counsel for Adam Brandon (dated June 12, 2013) (granting extension of time).	AR0369
32.	Response of FWFA and R. Russ Walker, Treasurer of FWFA, to the Amended Complaint (submitted by William J. McGinley and Benjamin D. Wood, Counsel to FWFA and R. Russ Walker, Treasurer of FWFA) (dated June 12, 2013).	AR0370-75
33.	Response of Richard J. Stephenson to the Amended Complaint (Letter from George J. Terwilliger, III, Counsel for Richard J. Stephenson, to Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division (dated June 14, 2013)).	AR0376-78
34.	Response of Adam Brandon to the Amended Complaint (Letter from Brian A. Benczkowski, Counsel for Adam Brandon, to Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division (dated June 27, 2013)).	AR0379-84

35.	FEC First General Counsel's Report (date-stamped June 17, 2014), Attachments 1-3 (materials referenced in the report), Attachment 4 (proposed Factual and Legal Analysis (Specialty Investments Group, <i>et al.</i>)), Attachment 5 (proposed Factual and Legal Analysis (Stephenson)), Attachment 6 (proposed Factual and Legal Analysis (Brandon)), and Attachment 7 (proposed Factual and Legal Analysis (FWFA)).	AR0385-0527
36.	Letter from Michael A. Columbo, Staff Attorney, FEC Enforcement Division, to Gregory Craig and Kenneth Gross, Counsel to Special Investments Group, Inc., Kingston Pike Development, LLC, and William S. Rose, Jr. (date-stamped Aug. 8, 2014) (providing status report).	AR0528-29
37.	Letter from Michael A. Columbo, Staff Attorney, FEC Enforcement Division, to Heidi K. Abegg and Alan P. Dye, Counsel for Adam Brandon (date-stamped Aug. 8, 2014) (providing status report).	AR0530
38.	Letter from Michael A. Columbo, Staff Attorney, FEC Enforcement Division, to George J. Terwilliger, III, Counsel for Richard J. Stephenson (date-stamped Aug. 8, 2014) (providing status report).	AR0531
39.	Letter from Michael A. Columbo, Staff Attorney, FEC Enforcement Division, to William J. McGinley and Benjamin L. Ginsberg, Counsel for FWFA and Ryan Hecker, Treasurer of FWFA (date-stamped Aug. 8, 2014) (providing status report).	AR0532
40.	Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division, to William J. McGinley and Benjamin L. Ginsburg, Counsel for FWFA and Melodie Johnson, Treasurer of FWFA (date-stamped Oct. 20, 2015) (providing status report).	AR0533
41.	Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division, to Gregory Craig and Kenneth Gross, Counsel to Special Investments Group, Inc., Kingston Pike Development, LLC, and William S. Rose, Jr. (date-stamped Oct. 20, 2015) (providing status report).	AR0534-35

42.	Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC	AR0536
	Enforcement Division, to Heidi K. Abegg and Alan P. Dye,	
	Counsel for Adam Brandon (date-stamped Oct. 20, 2015)	
	(providing status report).	

- Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC AR0537 Enforcement Division, to George J. Terwilliger, III, Counsel to Richard J. Stephenson (date-stamped Oct. 20, 2015) (providing status report).
- Letter from Brian A. Benczkowski, Counsel for Adam Brandon, AR0538 to Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division (dated Oct. 26, 2015) (requesting future correspondence re: Adam Brandon be directed to him) and Enclosures* (Letter from Mark D. Shonkwiler included at AR0536 [to Heidi K. Abegg and Alan P. Dye, Counsel for Adam Brandon (date-stamped Oct. 20, 2015)] and completed Designation of Counsel form included at AR0366).
- 45. Amended Certification[†] by the FEC Deputy Secretary of the AR0539-40 Commissioners' October 29, 2015 votes in MUR 6711 (certification signed and dated Nov. 2, 2015).
- 46. Certification by the FEC Deputy Secretary of the Commissioners' AR0541-42 November 17, 2015 votes in MUR 6711 (certification signed and dated Nov. 18, 2015).
- 47. Certification by the FEC Deputy Secretary of the Commissioners' AR0543-44
 February 23, 2016 votes in MUR 6711 (certification signed and dated Feb. 24, 2016).
- Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC AR0545 Enforcement Division, to Brian A. Benczkowski, Counsel for Adam Brandon (date-stamped Mar. 4, 2016) (providing notification of file closure).
- Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC AR0546-47
 Enforcement Division, to Fred Wertheimer of Complainant
 Democracy 21 (date-stamped Mar. 4, 2016) (providing notification of file closure).

[†] The amended certification referenced in this MUR supersedes the original certification that contained minor clerical errors.

50.	Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division, to Gregory Craig and Kenneth Gross, Counsel to Special Investments Group, Inc., Kingston Pike Development, LLC, and William S. Rose, Jr. (date-stamped Mar. 4, 2016) (providing notification of file closure).	AR0548
51.	Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division, to George J. Terwilliger, III, Counsel to Richard J. Stephenson (date-stamped Mar. 4, 2016) (providing notification of file closure).	AR0549
52.	Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division, to J. Gerald Herbert of Complainant Campaign Legal Center (date-stamped Mar. 4, 2016) (providing notification of file closure).	AR0550-51
53.	Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division, to William J. McGinley and Benjamin L. Ginsberg, Counsel to FWFA and Melodie Johnson, Treasurer of FWFA (date-stamped Mar. 4, 2016) (providing notification of file closure).	AR0552
54.	Statement of Reasons of FEC then-Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Lee E. Goodman in MURs 6485, 6487, 6488, 6711 & 6930 (signed and dated Apr. 1, 2016).	See AR0075-89
55.	Statement of Reasons of FEC then-Vice Chairman Steven T. Walther, then-Commissioner Ann M. Ravel, and Commissioner Ellen L. Weintraub in MURs 6485, 6487, 6488, 6711 & 6930 (signed and dated Apr. 1, 2016).	<i>See</i> AR0090-94
56.	Statement of then-Commissioner Ann M. Ravel and Commissioner Ellen L. Weintraub in MURs 6485, 6487, 6488, 6711 & 6930 (signed and dated Apr. 13, 2016).	See AR0095-97
57.	Supplemental Statement of then-Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Lee E. Goodman in MURs 6485, 6487, 6488, 6711 & 6930 (signed and dated Apr. 18, 2016).	See AR0098-101

Case 1:16-cv-00752-JDB Document 28-3 Filed 05/12/17 Page 10 of 10

IN TESTIMONY WHEREOF, the Secretary and Clerk of the Federal Election

Commission, being duly authorized, has set her hand and affixed the seal of the Federal Election

Commission in the city of Washington, District of Columbia, this 11th day of May, 2017.

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Dayna C. Brown Secretary and Clerk Federal Election Commission