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April 12, 2017

Submitted via email and postal mail

Federal Election Commission
Office of Complaints Examination
and Legal Administration
Attn: Mary Beth deBeau, Paralegal
999 E Street NW
Washington, DC 20463
CELA@fec.gov

RE: MUR 7147

Dear Ms. deBeau:

On October 6, 2016 the Campaign Legal Center filed a complaint with the Commission alleging that Make America Number 1 had made illegal in-kind contributions to Donald J. Trump for President, Inc. (MUR 7147), and provided supplemental information in a letter dated December 2, 2016. We write today to provide additional information relevant to the Commission's consideration of this case.

CLC's original complaint alleged, among other things, that "Make America Number 1 is inextricably intertwined with the Trump campaign," such that there is reason to believe that many of the super PAC's expenditures were coordinated with the Trump campaign, and accordingly should be treated as in-kind contributions to the Trump campaign.

Reports published since the complaint was filed provide additional evidence in support of the Commission finding reason to believe that Make America Number 1 and Donald J. Trump for President, Inc. violated the Federal Election Campaign Act (FECA).

Make America Number 1 Made Undisclosed and Excessive Contributions to Donald J. Trump for President, Inc. By Indirectly Paying Stephen Bannon for Personal Services Rendered to the Trump Campaign

CLC's complaint alleged that Make America Number 1 appeared to have paid compensation to Trump campaign CEO Stephen Bannon (now White House chief strategist) via payments to the firms Glittering Steel LLC and Cambridge Analytica, which are incorporated or have been paid at the same address as Bannon's consulting

firm, Bannon Strategic Advisors, Inc.¹ During that same period, as Bannon worked as Trump campaign CEO, Donald J. Trump for President, Inc. did not report any payments to Bannon directly.

There is reason to believe that these payments constituted Make America Number 1 paying compensation to Bannon for his personal services rendered to the Trump campaign, which must be treated as in-kind contributions to the Trump campaign, 52 U.S.C. § 30101(8)(A)(ii). As a result, Make America Number 1 violated FECA by failing to report these in-kind contributions, *id.* §§ 30104(b)(4)(H)(i) and 30104(b)(3)(B)(i), by making contributions in excess of federal contribution limits, *id.* § 30116(a)(1), and by violating its oath that it would only make independent expenditures; Donald J. Trump for President, Inc. violated FECA by failing to report its receipt of these in-kind contributions, *id.* §§ 30104(b)(2)(D) and 30104(b)(3)(B), and by accepting contributions in excess of federal limits, *id.* §§ 30116(a)(1).²

Recently-filed reports provide additional evidence in support of these allegations, and demonstrate that Glittering Steel LLC is owned by Bannon, chaired by Bannon, and a source of income for Bannon. Therefore, there is reason to believe that Make America Number 1's payments to Glittering Steel LLC were a means of paying compensation to Bannon.

According to Bannon's Executive Branch Personnel Public Financial Disclosure Report, filed with the White House on March 31, 2017, Bannon was Chairman of Glittering Steel LLC, and earned \$167,500 over the previous calendar year for "consulting and director fees," paid via a monthly fee into his consulting firm, Bannon Strategic Advisors, Inc., and "into Mr. Bannon's respective corporations."³ Bannon also reported that his ownership stake in the company is valued between \$100,001 and \$250,000.⁴

Although Bannon's financial disclosure states that Glittering Steel LLC is located in Arlington, Virginia, most of Make America Number 1's reports filed with the Commission listed payments to Glittering Steel LLC at the same California address as Bannon's consulting firm, 8383 Wilshire Blvd., Suite 1000, in Beverly Hills.⁵ This may

¹ See Compl. ¶¶ 79, 86-91; *see also* Dec. 2, 2016 supp.

² Compl. ¶¶ 121-128.

³ See Stephen Bannon, Executive Branch Personnel Public Financial Disclosure Report OGE Form 278e (Mar. 31, 2017) at 4, attached as Exhibit A.

⁴ *Id.*

⁵ See Make America Number 1, Independent Expenditures, Payee Glittering Steel LLC, FED. ELEC. COMM. (Jan. 01, 2015 to Aug. 01, 2016), https://beta.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00575373&is_notice=false&payee_name=glittering+steel&min_date=01%2F01%2F2015&max_date=08%2F01%2F2016; *see also* Make America Number 1, Disbursements to Glittering Steel LLC, FED. ELEC. COMM. (Jul. 17, 2015 to Jul. 27, 2016), https://beta.fec.gov/data/disbursements/?two_year_transaction_period=2016&data_type=processed&committee_id=C00575373&recipient_name=GLITTERING+STEEL+LLC&min_date=01%2F01%2F2015&max_date=12%2F31%2F2016. However, Make America Number 1's reports filed

indicate that Bannon was the true beneficiary of payments from the super PAC to Glittering Steel LLC.

Bannon’s financial disclosure claims that he resigned as Chair of Glittering Steel LLC and from board positions in other companies on August 16, 2016, the same day he joined the Trump campaign as CEO.⁶ However, there is reason to suspect these assertions. For example, Bannon’s financial disclosure also claims he resigned as Executive Chairman of Breitbart News on August 16, but current Breitbart CEO Larry Solov stated in a recent letter to the Senate Press Gallery that Bannon actually resigned “on or about” November 13—five days after the election, and three months after Bannon claimed to have resigned.⁷

Even if Bannon did resign as Chair of Glittering Steel LLC on August 16, his financial disclosure indicates that he maintained a financial stake in the company during his entire tenure as Trump campaign CEO. The report indicates that Bannon’s current ownership stake in the company is valued between \$100,001 and \$250,000,⁸ and that he “has an agreement in principle for [the] sale” of Glittering Steel⁹—meaning that he still owns it.

As a result, as Bannon worked for the Trump campaign without pay, he continued to benefit, directly or indirectly, from the estimated \$267,500 in payments that Make America Number 1 made to Glittering Steel LLC after or around his officially joining the

with the Commission after CLC’s complaint replaced Glittering Steel’s California address with an address at a UPS Store in Arlington, VA. *See* sources cited *infra* notes 10-13.

Additionally, the same day that CLC filed its complaint, on October 6, 2016, Bannon Strategic Advisors, Inc. filed paperwork with the California Secretary of State changing its address. *Compare* Exhibit B (Bannon Strategic Advisors, Inc., Statement of Information (Jun. 30, 2016)) with Exhibit C (Bannon Strategic Advisors, Inc., Statement of Information (Oct. 6, 2016)).

⁶ Exhibit A at 4.

⁷ Rosie Gray, *Breitbart’s Fight to Prove It’s a Legitimate News Outlet*, THE ATLANTIC (Mar. 27, 2017), <https://www.theatlantic.com/politics/archive/2017/03/breitbart-is-fighting-to-prove-its-a-legitimate-news-outlet/520926/>.

⁸ Exhibit A at 4.

⁹ *Id.* at 7.

campaign (\$15,000 in August,¹⁰ \$77,500 in September,¹¹ \$65,500 in October,¹² and \$109,500 between November 1 and November 4¹³).¹⁴

CLC's October 6 complaint also indicates there may be reason to believe that Make America Number 1 compensated Bannon through payments to the data firm "Cambridge Analytica" which, according to Make America Number 1's reports filed with the Commission, received payments at the same address as Bannon's consulting firm, 8383 Wilshire Blvd., Suite 1000 in Beverly Hills, California."¹⁵

Bannon's financial disclosures confirm his relationship with Cambridge Analytica: Bannon was Vice-President and Secretary of the company,¹⁶ and holds a financial stake valued between \$1,000,001 and \$5,000,000.¹⁷ Bannon also reported receiving \$125,333 from Cambridge Analytica over the previous year in "consulting fees," paid through his firm, Bannon Strategic Advisors, Inc.¹⁸ As is the case with Glittering Steel, Bannon claims to have resigned from Cambridge Analytica's board on August 16,¹⁹ but his financial disclosure indicates that he maintained a financial stake in the company during his tenure as Trump campaign CEO.²⁰

¹⁰ Make America Number 1 Report of Receipts and Disbursements, September Monthly FEC Form 3X (reporting period 08/01/16 to 08/31/16) at 14, <http://docquery.fec.gov/pdf/645/201612149040609645/201612149040609645.pdf>

¹¹ Make America Number 1 Report of Receipts and Disbursements, October Monthly (reporting period 09/01/16 to 09/31/16) at 18-19, 23, <http://docquery.fec.gov/pdf/506/201610209034283506/201610209034283506.pdf#navpanes=0>

¹² Make America Number 1 Report of Receipts and Disbursements, Pre-General Report (amended), (reporting period 10/01/16 to 10/20/16) at 14, <http://docquery.fec.gov/pdf/015/201702219050497015/201702219050497015.pdf>; Post-General Report, (reporting period 10/21/16 to 11/28/16) at 13, <http://docquery.fec.gov/pdf/639/201612089040542639/201612089040542639.pdf>. Make America Number 1's original pre-general report reflected a \$50,000 payment to Glittering Steel LLC on October 21 that was eliminated from the amended report. *See* Report of Receipts and Disbursements, Pre-General Report (reporting period 10/01/16 to 10/20/16) at 14, <http://docquery.fec.gov/pdf/063/201610279034660063/201610279034660063.pdf>.

¹³ Report of Receipts and Disbursements, Post-General Report, (reporting period 10/21/16 to 11/28/16), *supra* note 12, at 15-17.

¹⁴ CLC's December 2, 2016 letter estimated that Make America Number 1 had made \$280,000 in payments to Glittering Steel LLC, based on the political committee's reports filed with the Commission at that time. However, Make America Number 1's amended reports show fewer disbursements to Glittering Steel LLC than the committee initially reported. *See supra* note 12.

¹⁵ *See* Compl. ¶ 88. On November 18, 2016, both Breitbart News LLC and Breitbart Holdings filed paperwork with the California Secretary of State changing their address.

¹⁶ Exhibit A at 4.

¹⁷ *Id.*

¹⁸ *Id.* at 3.

¹⁹ *Id.* at 4.

²⁰ *Id.* at 7.

Here too, there is reason to believe that some proportion of Make America Number 1’s payments to Cambridge Analytica was used to pay compensation to Bannon for his work

Make America Number 1 Illegally Made In-Kind Contributions to Donald J. Trump for President, Inc. in the form of Coordinated Communications By Using the “Common Vendor” Cambridge Analytica

CLC’s October 6 complaint also alleges that, by Make America Number 1 and Donald J. Trump for President, Inc. using the common vendor Cambridge Analytica for similar services—such as identifying voters and developing the content of communications—there is reason to believe that Cambridge Analytica used or conveyed to Make America Number 1 information about the Trump campaign’s “plans, projects, activities or needs,” and that such information was “material to the creation, production, or distribution” of the political committee’s communications, 11 C.F.R. § 109.21(d)(4), and that therefore Make America Number 1 made in-kind contributions to Donald J. Trump for President, Inc. in the form of coordinated communications.²¹

As a result, Make America Number 1 violated FECA by failing to report these contributions, *id.* §§ 30104(b)(4)(H)(i) and 30104(b)(3)(B)(i), by making contributions in excess of federal contribution limits, *id.* § 30116(a)(1), and by violating its oath that it would only make independent expenditures; Donald J. Trump for President violated FECA by failing to report its receipt of these in-kind contributions, *id.* §§ 30104(b)(2)(D) and 30104(b)(3)(B), and by accepting contributions in excess of federal limits, *id.* §§ 30116(a)(1).²²

New evidence provides further support for these allegations.

Make America Number 1 was principally funded by Robert Mercer, and chaired and led by his daughter, Rebekah Mercer. According to the *New Yorker*, Mercer also invested five million dollars into the parent company of Cambridge Analytica, SCL Group,²³ which according to the *Washington Post* made them the “principal investors” in the company.²⁴

According to the *Huffington Post*:

²¹ See e.g. Compl. ¶¶ 95-103.

²² Compl. ¶ 121-128.

²³ Jane Mayer, *The Reclusive Hedge Fund Billionaire Behind the Trump Presidency*, NEW YORKER (Mar. 27, 2016), <http://www.newyorker.com/magazine/2017/03/27/the-reclusive-hedge-fund-tycoon-behind-the-trump-presidency>.

²⁴ Matea Gold, *The Mercers and Stephen Bannon: How a Populist Power Base Was Funded and Built*, WASH. POST (Mar. 17, 2017), <https://www.washingtonpost.com/graphics/politics/mercerc-bannon/>.

“As Rebekah [Mercer] saw it, [Cambridge Analytica parent] SCL would allow the Mercers to control the data operation of any campaign they supported, giving the family enormous influence over messaging and strategy.”²⁵

The *New Yorker* reported that Make America Number 1’s support for Trump came with “strings attached:” namely, that the campaign hire Cambridge Analytica.²⁶ According to the article:

The Mercers redirected their Cruz super pac to support Trump, and gave two million dollars to it. According to one Trump adviser, there were strings attached to the donation. He says that, two weeks before Cruz dropped out, Bannon urged the Trump campaign to talk to Alexander Nix, Cambridge Analytica’s C.E.O., about hiring the company. (The previous year, the Trump campaign had rebuffed a pitch from the firm.) . . . Paul Manafort, Trump’s campaign manager at the time, said that he knew nothing of Nix’s cash offer but gave Cambridge Analytica a limited contract, though he didn’t see the need, in deference to the Mercers.²⁷

As noted above, Bannon’s financial disclosures show that he was Vice-President and Secretary of Cambridge Analytica.²⁸ The *Huffington Post* also recounts how Bannon and Rebekah Mercer together were involved in negotiations on Cambridge Analytica’s behalf when Make America Number 1 (then called Keep the Promise 1) was supporting candidate Ted Cruz.²⁹

Bannon claimed that he resigned from Cambridge Analytica on August 16, 2016.³⁰ Even if this is true, then it means Bannon was still Vice-President and Secretary of the company when both the Trump campaign and Make America Number 1 began simultaneously using its services: Donald J. Trump for President, Inc., reported its first payments to Cambridge Analytica on July 29, 2016.³¹

Finally, Bannon’s financial disclosure shows that he continues to hold a financial stake in Cambridge Analytica valued between \$1,000,001 and \$5,000,000. ³² This means that as the Trump campaign’s CEO, Bannon held an ownership stake in the vendor that both the campaign and the super PAC hired to provide similar services.

In short, both the Trump campaign’s CEO and Make America Number 1’s leadership owned and were on the board of Cambridge Analytica, and the Trump campaign hired Cambridge Analytica as an apparent condition of Make America Number 1’s support for

²⁵ Vicky Ward, *The Blow it All Up Billionaires*, HUFF. POST (Mar. 17, 2017), <http://highline.huffingtonpost.com/articles/en/mercers/>.

²⁶ Mayer, *supra* note 23.

²⁷ *Id.*

²⁸ Exhibit A at 4.

²⁹ Ward, *supra* note 25.

³⁰ Exhibit A at 4.

³¹ See Compl. ¶¶95-100.

³² Exhibit A at 7.

Trump, strengthening the inference that the vendor was used as a means of sharing information between the campaign and political committee.

Contributors to Make America Number 1 Have Been Offered Significant Influence in the Trump Administration

The U.S. Supreme Court has repeatedly declared that “[t]he absence of prearrangement and coordination of an expenditure with the candidate . . . undermines the value of the expenditure to the candidate,” and “also alleviates the danger that expenditures will be given as a *quid pro quo* for improper commitments from the candidate.”³³

Because Make America Number 1’s expenditures appear to have been coordinated with President Trump’s campaign committee, its expenditures were apparently of such great value to the Trump campaign that its chair, Rebekah Mercer, was named to the executive committee of President-Elect Trump’s transition team, and that she has reportedly been “among those wielding the most clout” in Trump’s administration.³⁴

Other large donors to Make America Number 1 may have been offered a level of access and influence commensurate with having contributed directly to the Trump campaign. According to the *Washington Post*, a donor who gave \$100,000 to Make America Number 1, Erik Prince, reportedly “presented himself as an unofficial envoy for Trump to high-ranking Emiratis” in setting up a meeting with a confidant to Russian President Vladimir Putin “as part of an apparent effort to establish a back-channel line of communication between Moscow and President-elect Donald Trump, according to U.S., European and Arab officials.”³⁵ Prince reportedly held the meetings during the transition period, when Rebekah Mercer was on the Trump transition team’s executive committee.

Please do not hesitate to contact us if we can provide any additional information.

³³ *Citizens United v. FEC*, 130 S. Ct. 876, 908 (2010) (quoting *Buckley v. Valeo*, 424 U.S. 1, 47 (1976)) (internal quotations marks omitted).

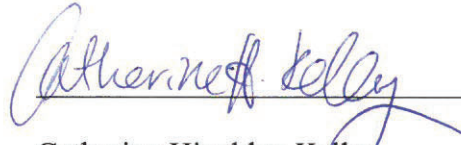
³⁴ Kenneth P. Vogel, *The Heiress Quietly Shaping the Trump Administration*, POLITICO, Nov. 21, 2016, <http://www.politico.com/story/2016/11/rebekah-mercero-donald-trump-231693>.

³⁵ Adam Entous, Greg Miller, Kevin Sieff and Karen DeYoung, *Blackwater founder held secret Seychelles meeting to establish Trump-Putin back channel*, WASH. POST (Apr. 3, 2017), https://www.washingtonpost.com/world/national-security/blackwater-founder-held-secret-seychelles-meeting-to-establish-trump-putin-back-channel/2017/04/03/95908a08-1648-11e7-ada0-1489b735b3a3_story.html?utm_term=.196a3b2ede3d.

Respectfully submitted,



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Brendan M. Fischer
The Campaign Legal Center
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Washington, DC 20005

Counsel to the Campaign Legal Center

VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

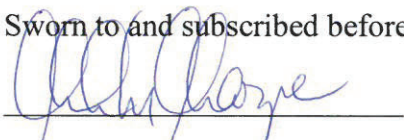
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center



Lawrence M. Noble

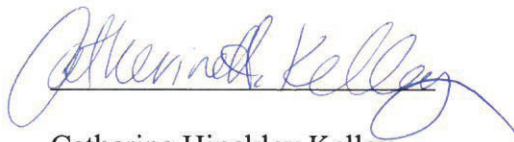
Sworn to and subscribed before me this 12th day of April 2017.



Notary Public

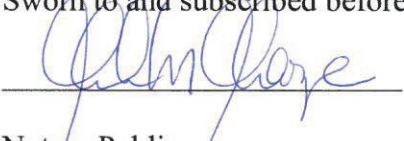


For Complainant Catherine Hinckley Kelley



Catherine Hinckley Kelley

Sworn to and subscribed before me this 12th day of April 2017.



Notary Public

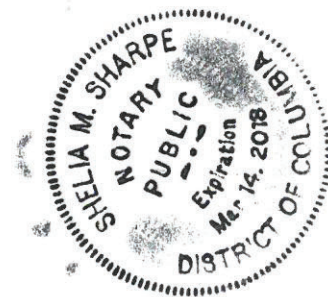


Exhibit A

Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Bannon, Steve

Assistant to the President and Chief Strategist, White House

Date of Appointment: 11/13/2016

Other Federal Government Positions Held During the Preceding 12 Months:

None

Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

/s/ Bannon, Stephen N [electronically signed on 03/30/2017 by Bannon, Stephen N in Integrity.gov] - Filer received a 5 day filing extension.

Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ Passantino, Stefan, Certifying Official [electronically signed on 03/31/2017 by Passantino, Stefan in Integrity.gov]

Other review conducted by

/s/ Schultz, James D, Ethics Official [electronically signed on 03/31/2017 by Schultz, James D in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 03/31/2017

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	GOVERNMENT ACCOUNTABILITY INSTITUTE, INC.	TALLAHASSEE, Florida	Non-Profit	CHAIRMAN	3/2012	8/2016
2	BANNON STRATEGIC ADVISORS, INC.	LOS ANGELES, California	Corporation	PRESIDENT	6/2005	Present
3	BANNON FILM INDUSTRIES, INC.	LOS ANGELES, California	Corporation	PRESIDENT	11/1990	Present
4	BREITBART NEWS NETWORK, LLC	LOS ANGELES, California	LLC	EXECUTIVE CHAIRMAN	1/2012	8/2016
5	CAMBRIDGE ANALYTICA, LLC	WASHINGTON, District of Columbia	LLC	VICE-PRESIDENT AND SECRETARY	6/2014	8/2016
6	GLITTERING STEEL, LLC	ARLINGTON, Virginia	LLC	CHAIRMAN	6/2015	8/2016
7	RECLAIM NEW YORK, INC.	NEW YORK, New York	Non-Profit	VICE-CHAIRMAN	11/2013	8/2016
8	VICTORY FILM GROUP, LLC	LOS ANGELES, California	LLC	MANAGER	2/2012	Present
9	VICTORY FILM PROJECT, LLC	TALLAHASSEE, Florida	LLC	MANAGER	12/2010	Present
10	VFP II, LLC	TALLAHASSEE, Florida	LLC	MANAGER	12/2010	Present
11	VFP III, LLC	TALLAHASSEE, Florida	LLC	MANAGER	2/2011	Present
12	VFG V, LLC	LOS ANGELES, California	LLC	MANAGER	3/2012	Present

2. Filer's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	GOVERNMENT ACCOUNTABILITY INSTITUTE, INC.	N/A	None (or less than \$1,001)	Salary	\$61,539
2	BANNON FILM INDUSTRIES, INC. (ENTERTAINMENT AND MEDIA SERVICES COMPANY)	N/A	\$1,000,001 - \$5,000,000	FLOW-THRU ORDINARY INCOME FROM PRIVATELY HELD CORPORATION	
2.1	CITIZENS UNITED PRODUCTION IV, LLC	No	None (or less than \$1,001)	DIRECTOR FEES PAID TO BANNON FILM INDUSTRIES, INC.	\$100,000
2.2	SPECIAL PROJECTS DIV	No	None (or less than \$1,001)	DIRECTOR FEES PAID INTO BANNON FILM INDUSTRIES, INC.	\$19,500
2.3	SOCIETE GENERALE	No	\$1,000,001 - \$5,000,000	Rent or Royalties	\$50,001 - \$100,000
3	BANNON STRATEGIC ADVISORS, INC. (CONSULTANCY CORPORATION)	N/A	\$5,000,001 - \$25,000,000	FLOW-THRU INCOME FROM PRIVATELY HELD CORPORATION	\$493,836
3.1	BREITBART NEWS NETWORK, LLC	No	None (or less than \$1,001)	CONSULTING FEES RECEIVED INTO MR. BANNON'S CONSULTANCY CORPORATION	\$191,000
3.2	CAMBRIDGE ANALYTICA, LLC	No	None (or less than \$1,001)	CONSULTING FEES RECEIVED BY MR. BANNON'S CONSULTANCY CORPORATION.	\$125,333

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.3	GLITTERING STEEL, LLC	No	None (or less than \$1,001)	CONSULTING AND DIRECTOR FEES PAID INTO MR. BANNON'S RESPECTIVE CORPORATIONS	\$167,500
4	CAMBRIDGE ANALYTICA, LLC, MEMBERSHIP UNITS	No	\$1,000,001 - \$5,000,000		None (or less than \$201)
5	GLITTERING STEEL, LLC, MEMBERSHIP UNITS	N/A	\$100,001 - \$250,000		None (or less than \$201)
6	AFFINITY MEDIA HOLDINGS, LLC	No	\$100,001 - \$250,000	Capital Gains	\$100,001 - \$1,000,000

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	GLITTERING STEEL, LLC	ARLINGTON, Virginia	CHAIRMAN. RECEIVED A MONTHLY CONSULTING FEE INTO BANNON STRATEGIC ADVISORS, INC. UNTIL RESIGNATION ON AUGUST 16, 2016.	6/2014
2	CAMBRIDGE ANALYTICA, LLC	WASHINGTON, District of Columbia	VICE-PRESIDENT AND SECRETARY. RECEIVED A MONTHLY CONSULTING FEE INTO BANNON STRATEGIC ADVISORS, INC. UNTIL RESIGNATION ON AUGUST 16, 2016.	6/2015
3	GOVERNMENT ACCOUNTABILITY INSTITUTE, INC.	TALLAHASSEE, Florida	EMPLOYED AS CHAIRMAN OF THE 501(C)(3) UNTIL AUGUST 16, 2016 WHEN A LEAVE OF ABSENCE BEGAN UPON APPOINTMENT AS THE CAMPAIGN CHIEF FOR PRESIDENT ELECT DONALD J. TRUMP.	3/2012
4	BREITBART NEWS NETWORK, LLC	LOS ANGELES, California	EXECUTIVE CHAIRMAN. RECEIVED A MONTHLY CONSULTING FEE INTO BANNON STRATEGIC ADVISORS, INC. UNTIL RESIGNATION ON AUGUST 16, 2016.	1/2012
5	BANNON STRATEGIC ADVISORS, INC.	LOS ANGELES, California	EMPLOYED AS PRESIDENT OF SOLELY OWNED CORPORATION TO PROVIDE CONSULTING AND ADVISORY SERVICES TO A VARIETY OF COMPANIES.	6/2005

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
6	BANNON FILM INDUSTRIES, INC. See Endnote	LOS ANGELES, California	EMPLOYED AS PRESIDENT OF SOLELY OWNED CORPORATION TO ENTERTAINMENT AND MEDIA RELATED SERVICES TO A VARIETY OF COMPANIES.	11/1990

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	GOVERNMENT ACCOUNTABILITY INSTITUTE, INC.	TALLAHASSEE, Florida	CHAIRMAN
2	BANNON FILM INDUSTRIES, INC.	LOS ANGELES, California	PRESIDENT
3	BANNON STRATEGIC ADVISORS, INC.	LOS ANGELES, California	PRESIDENT
4	BREITBART NEWS NETWORK, LLC	LOS ANGELES, California	CONSULTING AND ADVISORY SERVICES VIA BANNON STRATEGIC ADVISORS, INC.
5	CAMBRIDGE ANALYTICA, LLC	WASHINGTON, District of Columbia	CONSULTING AND ADVISORY SERVICES VIA BANNON STRATEGIC ADVISORS, INC.
6	GLITTERING STEEL, LLC	ARLINGTON, Virginia	CONSULTING AND ADVISORY SERVICES VIA BANNON STRATEGIC ADVISORS, INC.

5. Spouse's Employment Assets & Income and Retirement Accounts

None

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. BANK ACCOUNT	No	\$100,001 - \$250,000	Interest	\$2,501 - \$5,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	U.S. BANK ACCOUNT	No	\$500,001 - \$1,000,000	Interest	\$15,001 - \$50,000
3	U.S. BANK ACCOUNT	No	\$500,001 - \$1,000,000	Interest	\$15,001 - \$50,000
4	LIFE INSURANCE SURRENDER VALUE	No	\$50,001 - \$100,000		None (or less than \$201)
5	RENTAL REAL ESTATE	No	\$1,000,001 - \$5,000,000	Rent or Royalties	\$50,001 - \$100,000
6	RENTAL REAL ESTATE	No	\$1,000,001 - \$5,000,000	Rent or Royalties	\$15,001 - \$50,000
7	RENTAL REAL ESTATE	No	\$250,001 - \$500,000	Rent or Royalties	\$5,001 - \$15,000
8	ARC ENTERTAINMENT, LLC	No	\$250,001 - \$500,000		None (or less than \$201)
9	VICTORY FILM GROUP LLC	See Endnote	None (or less than \$1,001)		None (or less than \$201)
9.1	VFG V	See Endnote	None (or less than \$1,001)		None (or less than \$201)
10	VICTORY FILM PROJECT, LLC	See Endnote	None (or less than \$1,001)		None (or less than \$201)
10.1	VFP II, LLC	See Endnote	None (or less than \$1,001)		None (or less than \$201)
10.2	VFP III, LLC	See Endnote	None (or less than \$1,001)		None (or less than \$201)

7. Transactions

(N/A) - Not required for this type of report

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	HOME LOAN #1	Mortgage (investment/rental property)	\$250,001 - \$500,000	2002	3.125%	30 YEAR
2	HOME LOAN #2	Mortgage (investment/rental property)	\$250,001 - \$500,000	2006	3.625%	Matures January 2037
3	HOME LOAN #3	Mortgage (investment/rental property)	\$500,001 - \$1,000,000	2004	3.625%	30 YEAR
4	HOME LOAN #4	Mortgage (investment/rental property)	\$100,001 - \$250,000	2015	4.125%	30 YEAR
5	CAMBRIDGE ANALYTICA, LLC	SECURED RECOURSE PROMISSORY NOTE	\$50,001 - \$100,000	2016	3.5%	5 YEARS

9. Gifts and Travel Reimbursements

(N/A) - Not required for this type of report

Endnotes

PART	#	ENDNOTE
2.	4	Filer has an agreement in principle for sale of this asset. Timing for sale subject to receipt of Certificate of Divestiture from Office of Government Ethics.
2.	5	Filer has an agreement in principle for sale of this asset. Timing for sale subject to receipt of Certificate of Divestiture from Office of Government Ethics.

PART	#	ENDNOTE
3.	5	DUE TO THE NEW POSITION WITH THE WHITE HOUSE, THE ENTITY WILL BE GOING DORMANT AND WILL ONLY RECEIVE PASSIVE INCOME.
3.	6	DUE TO THE NEW POSITION WITH THE WHITE HOUSE, THE ENTITY WILL BE GOING DORMANT AND WILL ONLY RECEIVE PASSIVE INCOME.
6.	9	IN THE PROCESS OF DISSOLVING THIS ENTITY AND WILL NOT ENGAGE IN ANY PROJECTS DURING THE PERIOD OF GOVERNMENT EMPLOYMENT.
6.	9.1	IN THE PROCESS OF DISSOLVING THIS ENTITY AND WILL NOT ENGAGE IN ANY PROJECTS DURING THE PERIOD OF GOVERNMENT EMPLOYMENT.
6.	10	IN THE PROCESS OF DISSOLVING THIS ENTITY AND WILL NOT ENGAGE IN ANY PROJECTS DURING THE PERIOD OF GOVERNMENT EMPLOYMENT.
6.	10.1	IN THE PROCESS OF DISSOLVING THIS ENTITY AND WILL NOT ENGAGE IN ANY PROJECTS DURING THE PERIOD OF GOVERNMENT EMPLOYMENT.
6.	10.2	IN THE PROCESS OF DISSOLVING THIS ENTITY AND WILL NOT ENGAGE IN ANY PROJECTS DURING THE PERIOD OF GOVERNMENT EMPLOYMENT.

Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

5. Spouse's Employment Assets & Income and Retirement Accounts

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$150 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

Public Burden Information

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).

Exhibit B



State of California Secretary of State

S

Statement of Information

(Domestic Stock and Agricultural Cooperative Corporations)

FEES (Filing and Disclosure): \$25.00.

If this is an amendment, see instructions.

IMPORTANT – READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

FE50757

FILED

In the office of the Secretary of State
of the State of California

JUN-30 2016

1. CORPORATE NAME

BANNON STRATEGIC ADVISORS, INC.

2. CALIFORNIA CORPORATE NUMBER

C2752795

This Space for Filing Use Only

No Change Statement (Not applicable if agent address of record is a P.O. Box address. See instructions.)

3. **If there have been any changes to the information contained in the last Statement of Information filed with the California Secretary of State, or no statement of information has been previously filed, this form must be completed in its entirety.**

If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to **Item 17**.

Complete Addresses for the Following (Do not abbreviate the name of the city. Items 4 and 5 cannot be P.O. Boxes.)

4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE	CITY	STATE	ZIP CODE
8383 WILSHIRE BOULEVARD, SUITE 1000, BEVERLY HILLS, CA 90211			
5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY	CITY	STATE	ZIP CODE
8383 WILSHIRE BOULEVARD, SUITE 1000, BEVERLY HILLS, CA 90211			
6. MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 4	CITY	STATE	ZIP CODE

Names and Complete Addresses of the Following Officers (The corporation must list these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)

7. CHIEF EXECUTIVE OFFICER/	ADDRESS	CITY	STATE	ZIP CODE
STEPHEN BANNON	8383 WILSHIRE BOULEVARD, SUITE 1000, BEVERLY HILLS, CA 90211			
8. SECRETARY	ADDRESS	CITY	STATE	ZIP CODE
STEPHEN BANNON	8383 WILSHIRE BOULEVARD, SUITE 1000, BEVERLY HILLS, CA 90211			
9. CHIEF FINANCIAL OFFICER/	ADDRESS	CITY	STATE	ZIP CODE
STEPHEN BANNON	8383 WILSHIRE BOULEVARD, SUITE 1000, BEVERLY HILLS, CA 90211			

Names and Complete Addresses of All Directors, Including Directors Who are Also Officers (The corporation must have at least one director. Attach additional pages, if necessary.)

10. NAME	ADDRESS	CITY	STATE	ZIP CODE
STEPHEN BANNON	8383 WILSHIRE BOULEVARD, SUITE 1000, BEVERLY HILLS, CA 90211			
11. NAME	ADDRESS	CITY	STATE	ZIP CODE
12. NAME	ADDRESS	CITY	STATE	ZIP CODE

13. NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS, IF ANY:

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 15 must be completed with a California street address, a P.O. Box address is not acceptable. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 15 must be left blank.

14. NAME OF AGENT FOR SERVICE OF PROCESS	CITY	STATE	ZIP CODE
STEVES RODRIGUEZ			
15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL	CITY	STATE	ZIP CODE
8383 WILSHIRE BOULEVARD, SUITE 1000, BEVERLY HILLS, CA 90211			

Type of Business

16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
STRATEGIC ADVISING

17. BY SUBMITTING THIS STATEMENT OF INFORMATION TO THE CALIFORNIA SECRETARY OF STATE, THE CORPORATION CERTIFIES THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

06/30/2016 EMILY WOLF AUTHORIZED PERSON
DATE TYPE/PRINT NAME OF PERSON COMPLETING FORM TITLE SIGNATURE

Exhibit C

16-632514



State of California Secretary of State

S

118

Statement of Information

(Domestic Stock and Agricultural Cooperative Corporations)

FEES (Filing and Disclosure): \$25.00.

If this is an amendment, see instructions.

IMPORTANT – READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

FILED
Secretary of State
State of California

OCT 06 2016

1. **CORPORATE NAME**
Bannon Strategic Advisors, Inc.

2. **CALIFORNIA CORPORATE NUMBER**
C2752795

11NF/PC

This Space for Filing Use Only

No Change Statement (Not applicable if agent address of record is a P.O. Box address. See instructions.)

3. **If there have been any changes to the information contained in the last Statement of Information filed with the California Secretary of State, or no statement of information has been previously filed, this form must be completed in its entirety.**

If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to **Item 17**.

Complete Addresses for the Following (Do not abbreviate the name of the city. Items 4 and 5 cannot be P.O. Boxes.)

4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE	CITY	STATE	ZIP CODE
8391 Beverly Blvd., #117	Los Angeles	CA	90048
5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY	CITY	STATE	ZIP CODE
8391 Beverly Blvd., #117	Los Angeles	CA	90048
6. MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 4	CITY	STATE	ZIP CODE

Names and Complete Addresses of the Following Officers (The corporation must list these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)

7. CHIEF EXECUTIVE OFFICER/ President	ADDRESS	CITY	STATE	ZIP CODE
Stephen K Bannon	8391 Beverly Blvd., #117	Los Angeles	CA	90048
8. SECRETARY	ADDRESS	CITY	STATE	ZIP CODE
Stephen K Bannon	8391 Beverly Blvd., #117	Los Angeles	CA	90048
9. CHIEF FINANCIAL OFFICER/ Treasurer	ADDRESS	CITY	STATE	ZIP CODE
Stephen K Bannon	8391 Beverly Blvd., #117	Los Angeles	CA	90048

Names and Complete Addresses of All Directors, Including Directors Who are Also Officers (The corporation must have at least one director. Attach additional pages, if necessary.)

10. NAME	ADDRESS	CITY	STATE	ZIP CODE
Stephen K Bannon	8391 Beverly Blvd., #117	Los Angeles	CA	90048
11. NAME	ADDRESS	CITY	STATE	ZIP CODE
12. NAME	ADDRESS	CITY	STATE	ZIP CODE

13. NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS, IF ANY:

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 15 must be completed with a California street address, a P.O. Box address is not acceptable. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 15 must be left blank.

14. NAME OF AGENT FOR SERVICE OF PROCESS	CITY	STATE	ZIP CODE
eResidentAgent, Inc.		CA	
15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL	CITY	STATE	ZIP CODE
		CA	

Type of Business

16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
Consulting services

17. BY SUBMITTING THIS STATEMENT OF INFORMATION TO THE CALIFORNIA SECRETARY OF STATE, THE CORPORATION CERTIFIES THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

10/05/2016

Erika Easter

Authorized Person

DATE

TYPE/PRINT NAME OF PERSON COMPLETING FORM

TITLE

SIGNATURE