

RESPONSE

EXHIBIT 1

FEC FORM 3

REPORT OF RECEIPTS AND DISBURSEMENTS For An Authorized Committee

SECRETARY OF THE SENATE Office Use Only

15 OCT 15 PM 3:34 12FE4M5

1. NAME OF COMMITTEE (in full)

TYPE OR PRINT

Example: If typing, type over the lines.

Friends of Patrick Murphy

ADDRESS (number and street) 4521 PGA Blvd. #412

Check if different than previously reported. (ACC)

Palm Beach Gardens CITY

FL STATE

33418 ZIP CODE

2. FEC IDENTIFICATION NUMBER

C00493825

3. IS THIS REPORT

NEW (N)

OR

AMENDED (A)

STATE

DISTRICT

FL

00

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
July 15 Quarterly Report (Q2)
October 15 Quarterly Report (Q3)
January 31 Year-End Report (YE)

(b) 12-Day PRE-Election Report for the:

- Primary (12P) General (12G) Runoff (12R)
Convention (12C) Special (12S)

Election on in the State of

(c) 30-Day POST-Election Report for the:

- General (30G) Runoff (30R) Special (30S)

Election on in the State of

Termination Report (TER)

5. Covering Period

07/01/2015

through

09/30/2015

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Brian Foucart

Signature of Treasurer

[Handwritten Signature]

Date

10/15/2015

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the Penalties of 2 U.S.C. 437g.

Office Use Only

FEC FORM 3 (Revised 02/2003)

201510160200268250

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 617 / 645
	<input checked="" type="checkbox"/> 17 <input type="checkbox"/> 18 <input type="checkbox"/> 19a <input type="checkbox"/> 19b <input type="checkbox"/> 20a <input type="checkbox"/> 20b <input type="checkbox"/> 20c <input type="checkbox"/> 21	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Friends of Patrick Murphy

Full Name (Last, First, Middle Initial) PCS Marketing Group		Transaction ID: VPE7J9Z9V74
Mailing Address 2534 Commerce Blvd		Date of Disbursement 07/01/2015
City Cincinnati	State OH	Zip Code 45241-1504
Purpose of Disbursement Printing	Category/ Type	Amount of Disbursement this Period \$374.60
Candidate Name		
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	
State: District:		

Full Name (Last, First, Middle Initial) Perkins Coie		Transaction ID: VPE7J9ZAW16
Mailing Address 1201 3rd Ave Ste 4900		Date of Disbursement 07/09/2015
City Seattle	State WA	Zip Code 98101-3095
Purpose of Disbursement Legal Services	Category/ Type	Amount of Disbursement this Period \$10,453.41
Candidate Name		
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	
State: District:		

Full Name (Last, First, Middle Initial) PhRMA		Transaction ID: VPE7J9ZFR59
Mailing Address 950 F St NW Ste 300		Date of Disbursement 08/07/2015
City Washington	State DC	Zip Code 20004-1440
Purpose of Disbursement Event Tickets	Category/ Type	Amount of Disbursement this Period \$5,038.00
Candidate Name		
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	
State: District:		

SUBTOTAL of Receipts This Page (optional)	\$15,866.01
TOTAL This Period (last page this line number only)	

201510160200268866

RESPONSE

EXHIBIT 2

POLITICOFLORIDA
PLAYBOOK
MARC CAPUTO'S MUST-READ BRIEFING ON WHAT'S HOT, CRAZY OR SHADY ABOUT POLITICS IN THE SUNSHINE STATE.

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POLITICO Florida

PRO

Grayson mum on meeting with ethics investigator



Alan Grayson. (AP Photo/Steve Cannon)

POLITICOFLORIDA
PLAYBOOK
MARC CAPUTO'S MUST-READ BRIEFING ON WHAT'S HOT, CRAZY OR SHADY ABOUT POLITICS IN THE SUNSHINE STATE.

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- 5 Rick Perry lobbied Rick Scott on political donor's issue

By **MARC CAPUTO** and **JOHN BRESNAHAN** 5:25 a.m. | Oct. 23, 2015 **7**

Known for his outspoken style, U.S. Rep. Alan Grayson was mum Thursday when POLITICO asked about an hours-long meeting he and his attorney had with a congressional ethics investigator examining the way the Democrat handled a network of hedge funds.

Grayson, a U.S. Senate candidate, didn't deny the meeting with the Office of Congressional Ethics investigator the day before but instead argued about whether he could talk about it.

"As I understand the rules, we're not allowed to discuss anything to do with the OCE at all," Grayson told POLITICO when repeatedly pressed on the issue.

Contrary to Grayson's claims, there does not appear to be any prohibition against him discussing his case, ethics lawyers said.

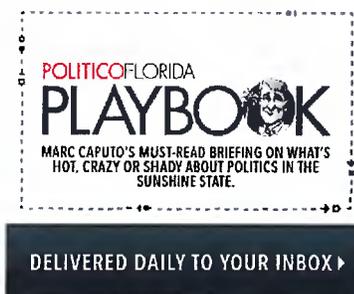
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The self-described "congressman with guts" also refused to comment about why his Senate campaign last quarter paid about \$15,000 for "legal services" to Akerman Senterfitt. A lawyer from the firm represented Grayson in his Wednesday meeting with the ethics investigator.

Akerman received the first of its four payments from Grayson's campaign on July 6, the day a



conservative watchdog group called Foundation for Accountability and Civic Trust announced it was filing an OCE complaint in response to a June 30 POLITICO report that raised questions about whether Grayson broke House ethics rules by putting his name in the titles of three hedge funds. They were overseen by a management company that also bore his name.

By using his name in the title of each of the funds, Grayson ran afoul of a House ethics rule designed to prevent members from using their elected offices for financial gain. Grayson, though, has said this rule does not apply to him because he had no “fiduciary responsibility” over the funds. Experts, however, dispute his claim.

Grayson started each fund in 2011 after losing a re-election bid. A year later, he won a newly drawn Central Florida district. While in congressional office, he kept the funds going. Once it looked as if he planned to run for Senate, however, the funds became a political liability for Grayson.

After Grayson was hit with his first ethics complaint, a supporter of his Democratic opponent for Senate, Rep. Patrick Murphy, filed a second complaint that alleged he unethically used his name to boost his funds’ earning power and that he also failed to disclose potential income from the funds.

Grayson’s office says his “disclosures are complete in every respect, including all conceivable applicable requirements regarding the fund.” It also describes the complaints as “completely unwarranted.”

While denying wrongdoing, Grayson changed the name of the hedge funds and related companies. He struck his last name and replaced it with the name “Sibyline” in each case. So, for instance, Grayson Fund L.P. was changed to Sibyline Fund L.P.

“The Congressman decided it was easier to change the name than continue to argue about it,” spokesman Ken Scudder said.

Grayson also claimed he shut down two of the funds in the Cayman Islands, but wouldn’t provide reporters with documentation to prove it.

On Thursday, Grayson wouldn’t discuss his interview with the congressional ethics investigator. He said a POLITICO reporter should double-check the rules before asking him to discuss the meeting.

“Don’t you think it’s incumbent on you, before you ask a question like that, to see if you’re right about that? If it turns out that you’re wrong, then what you’re doing is you’re asking a member of congress to commit an unethical act that you’re reporting right now,” Grayson said.

“If in fact there is a rule — which I think there is — against any discussion of OCE matters, then you are basically suborning me to commit an unethical act,” Grayson said.

That last comment struck Washington ethics lawyer Kenneth Gross as particularly odd. He said that when reporters ask questions in interviews, it’s not an act of “suborning” someone to commit an unethical or criminal act.

Gross said he has handled dozens of OCE cases and was unaware of anything that prohibited members from commenting on their cases. He said that in criminal investigations, targets of the FBI or a grand jury can discuss the cases and a congressman should be able to as well in a civil matter like this. Another Washington ethics lawyer, Stanley Brand, said he wasn't aware of any prohibition, either.

Asked later to give a specific rule or statutory citation to justify Grayson's belief he couldn't talk about his case, the congressman's office could give none.

Grayson's office would not disclose his schedule Wednesday — when he missed three votes while talking to the ethics investigator. It would only say he had an "off-site meeting."

A congressional spokesman for Grayson, slightly changing the congressman's statement to POLITICO, said "counsel has advised him that neither he nor anyone in his office can confirm or deny the existence of any investigation."

Asked if he wanted to talk about the payments to his counsel, Grayson was more direct: "Uh, no."

You can hear audio of the exchange here: <http://bit.ly/1OVUs3d>

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Author: **MARC CAPUTO** and **JOHN BRESNAHAN**

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RESPONSE

EXHIBIT 3

ALAN GRAYSON
9TH DISTRICT, FLORIDA

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WASHINGTON, DC 20515
(202) 225-9889

COMMITTEE ON SCIENCE, SPACE,
AND TECHNOLOGY
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MIDDLE EAST AND NORTH AFRICA
HELSINKI COMMISSION, MEMBER

Congress of the United States
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Washington, DC 20515-0909

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KISSIMMEE DISTRICT OFFICE
101 CHURCH STREET
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KISSIMMEE, FL 34741
(407) 518-4983

grayson.house.gov

October 26, 2015

Omar Ashmawy
Staff Director and Chief Counsel
Office of Congressional Ethics
425 3rd Street, S.W.
Suite 1110
Washington, D.C. 20024

Re: Review No. 15-6530/Confidentiality Violation

Dear Mr. Ashmawy:

I am writing to you to report a violation of the law creating the Office of Congressional Ethics ("OCE") and the OCE's Code of Conduct by one or more members of your staff.

House Resolution 895 prohibits members of your staff from disclosing to anyone outside your office any information obtained during the course of an investigation. H. Res. 895, § (f)(1)(B). Indeed, the resolution requires every individual who becomes a member of your staff to take an oath stating "I do solemnly swear (or affirm) that I will not disclose to any person or entity outside of the Office any information received in the course of my service with the Office, except as authorized by the board as necessary to conduct official business or pursuant to its rules." H. Res. 895, § (f)(1)(A). House Resolution 895 requires that any violation of these confidentiality provisions be investigated by the board and that appropriate action be taken. H. Res. 895, § (f)(1)(C). Identical confidentiality provisions are embedded in your office's Code of Conduct. OCE Code of Conduct, Section 8 – Prohibition on Public Disclosure.

As you know, on Wednesday, October 21, 2015, I voluntarily appeared at your office for an interview in the above-entitled matter. The interview began at approximately 9:30 a.m. and concluded at approximately 2:15 p.m. On Thursday, October 22, 2015, my office was contacted by two different reporters who knew both that I was interviewed in your offices by your staff on Wednesday, October 21, 2015 and that the interview lasted approximately five hours. Shortly thereafter, Politico published a news article, attached hereto as Exhibit 1, which reports similar information along with further detail that only someone from your office would know, namely that: the content of the interview concerned my investments, the date of the interview was Wednesday, October 21, 2015 and lasted several hours causing me to miss votes, and an Akerman attorney attended the Wednesday interview.

I find it especially troubling that your staff would disclose the length of the interview to the media or, worse, to a third party knowing that it would be disclosed to the media. The length of the interview, the persons attending the interview, and its content are facts that could only be known to me, my counsel, and your staff. As you know, one of my constituents, the Walt Disney Company, has an office on the same floor of your building. In the extremely unlikely event that there were reporters who were, without any notice from your office, willing to stake out the building for an entire day, they would have been able to observe me entering and leaving the building, but would have no way to know which office I visited unless they were told by your staff.

This information, including but not limited to the *fact* that the interview took place, the *length* of the interview, the persons attending the interview, and the *content* of the interview, are confidential information the public disclosure of which requires an investigation by the OCE board. H. Res. 895, § (f)(1)(C). It should be noted further that a disclosure of such information to *any third party*, much less the media, is a violation of House Resolution 895. H. Res. 895, § (f)(1)(B) ("No testimony received or any other information obtained as a member of the board or staff of the Office shall be publicly disclosed by any such individual to *any person or entity* outside the Office.") (emphasis added). Accordingly, any investigation of misconduct by the OCE staff must also inquire into confidential information that was leaked to third parties other than the media. By violating its duty of confidentiality regarding my interview, members of the OCE staff have opened the door to a broader investigation to determine what other confidential information they obtained during the course of their investigation has been provided to individuals outside your office as well as the identity of all those who received the leaked information, whether or not they were members of the media. Simply put, the OCE cannot use confidentiality as both a sword and shield that permits it to release information it has obtained during the course of its investigation while simultaneously prohibiting me from responding to press inquiries triggered by leaks to the media or other parties outside your office. This is especially true given that supporters of my political opponent filed the complaint that led to the OCE's present violation of rules concerning confidentiality.

I am sure that you find this violation of House Resolution 895 and the OCE Code of Conduct as troubling as I do since it calls into question the integrity of your investigation of this matter as well as any other pending investigations. Indeed, the House Ethics Committee recently admonished your office for leaking information to the Washington Post and found that such disclosure of information violated applicable law and standards of conduct. H.R. Rep. No. 114-239, at 16-17 (2015) ("Although the Committee is required to make public the materials transmitted to it by OCE in certain circumstances, the Committee is the only entity either required or authorized to make those materials public. . . . Anonymous leaks of ongoing ethics investigations are damaging to the Members involved, the ethics process, and the whole House."). Since the OCE has no power to compel the production of information, your office is entirely dependent on the voluntary cooperation of witnesses. Such cooperation will be difficult to obtain if witnesses know that your staff is willing to violate House Resolution 895 and its oath of confidentiality.

I expect a response from you by 5:00 p.m. today, October, 26, 2015, confirming that you have informed the OCE board of this violation and that the board is conducting the investigation required by law.

Sincerely,

A handwritten signature in black ink that reads "Alan Grayson". The signature is written in a cursive style with a long, sweeping underline.

Alan Grayson
Member of Congress

EXHIBIT 1

Did you know that in 2013 alone, 119,256 Floridians participated in clinical trials?



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Research-based biopharmaceutical companies invested almost \$1 billion in clinical trials in Florida in 2013 alone.



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Grayson mum on meeting with ethics investigator



Alan Grayson. (AP Photo/Steve Cannon)

By **MARC CAPUTO** and **JOHN BRESNAHAN** 5:25 a.m. | Oct. 23, 2015 7

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Contrary to Grayson's claims, there does not appear to be any prohibition against him discussing his case, ethics lawyers said.

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- Simmons' map amendment alters

The self-described "congressman with guts" also refused to comment about why his Senate campaign last quarter paid about \$15,000 for "legal services" to Akerman Senterfitt. A lawyer from the firm represented Grayson in his Wednesday meeting with the ethics investigator.

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You can hear audio of the exchange here: <http://bit.ly/1OVUs3d>

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Author: **MARC CAPUTO** and **JOHN BRESNAHAN**

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Ethics panel finds no conflict in former Scott lawyer's new appointment

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Jeff Theall • 4 hours ago

this jackass is never mum... so that's not good news for him.

1 ^ • Reply • Share

Ed Taylor • 5 hours ago

Forget meeting with ethics investigators; he needs to meet with a psychologist!

I suspect he is a nut job.

Did he get caught up on his child support?

INTJ • 5 hours ago

If Alan Grayson won't talk about something, it surely must be earth-shattering.

• Reply • Share

surfdog • 5 hours ago

Forget your Senate run Alan . Jump into the presidential race . Your perfect for it . Head to head with Hillary and talking about each others ethics .

1 • Reply • Share

Bronze Helmet • 3 hours ago

Of all people, he should have known better.

• Reply • Share

Scott Clendenin • 4 hours ago

Biggest POS in the State of Florida

• Reply • Share

Hollistic • 4 hours ago

Another ethics shorted Democrat

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RESPONSE

EXHIBIT 4

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Judy Biggers
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Allison Hayward
Omar S. Ashmawy, Staff Director & Chief Counsel
oce.house.gov
oce@mail.house.gov

David Skaggs, Co-Chair
Karan English
Belinda Pinckney, BG (R)
Michael Barnes

Congress of the United States
House of Representatives
OFFICE OF CONGRESSIONAL ETHICS
Washington, DC 20515

Mailing Address:
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Washington, DC 20515 0895

Office Address:
425 3rd Street, SW
Suite 1110
Washington, DC 20024

(202) 225-9739
(202) 226-0997 (FAX)

CONFIDENTIAL

October 26, 2015

The Honorable Alan M. Grayson
303 Cannon House Office Building
Washington, DC 20515

Re: Review No. 15-6530

Dear Representative Grayson:

We are in receipt of your October 26, 2015 letter regarding the Office of Congressional Ethics' ("OCE") commitment to maintaining the confidentiality of information received in the course of OCE reviews. The OCE Board and staff have a verifiable track record of maintaining confidentiality in all OCE reviews. Indeed, the OCE has never been admonished or found to have violated applicable law or standards of conduct.

The OCE has always complied and will continue to adhere to the confidentiality provisions of H. Res. 895 and the OCE's established procedures to prevent the unauthorized disclosure of information. In Review No. 15-6530 related to your conduct as a Member of the House of Representatives, and in all reviews conducted by the OCE, the OCE Board and staff has conducted itself with the highest integrity and professionalism.

The OCE Board will be informed of your letter promptly.

Respectfully yours,



Omar S. Ashmawy
Staff Director and Chief Counsel

RESPONSE

EXHIBIT 5

ALAN GRAYSON

9TH DISTRICT, FLORIDA

COMMITTEE ON SCIENCE, SPACE,
AND TECHNOLOGY

SUBCOMMITTEE ON ENERGY,
RANKING MEMBER

SUBCOMMITTEE ON ENVIRONMENT

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Congress of the United States
House of Representatives

Washington, DC 20515-0909

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KISSIMMEE DISTRICT OFFICE
101 CHURCH STREET
SUITE 550
KISSIMMEE, FL 34741
(407) 518-4983

grayson.house.gov

December 18, 2015

Omar Ashmawy
Staff Director and Chief Counsel
Office of Government Ethics
425 3rd Street, S.W.
Suite 1110
Washington, D.C. 20024

Re: Review No. 15-6530/Complaint Regarding Additional Confidentiality Violations

Dear Mr. Ashmawy:

I am writing to you to report further confidentiality violations by one or more members of the Office of Congressional Ethics' ("OCE") staff. Regrettably, these confidentiality violations have come to light or occurred after my October 26, 2015 letter to you concerning the OCE's confidentiality obligations.

As detailed in my October 26 letter, the OCE's organizing resolution prohibits members of your staff from disclosing to anyone outside your office any information obtained during the course of an investigation. H. Res. 895, § (f)(1)(B). Indeed, the resolution requires every individual who becomes a member of your staff to take an oath stating "I do solemnly swear that I will not disclose to any person or entity outside of the Office any information received in the course of my service with the Office, except as authorized by the board as necessary to conduct official business or pursuant to its rules." H. Res. 895, § (f)(1)(A). The resolution requires that any violation of these confidentiality provisions be investigated by the board and that appropriate action be taken. H. Res. 895, § (f)(1)(C). Identical confidentiality provisions are embedded in your office's Code of Conduct. OCE Code of Conduct, Section 8 - Prohibition on Public Disclosure.

In a letter dated October 26, 2015 responding to my letter earlier that day, you acknowledged the OCE's confidentiality obligations and assured me that this matter has been carried out in compliance with these confidentiality obligations and with "the highest integrity and professionalism." Recently, however, one of my colleagues and campaign advisors, Mr. David Keith, brought to my attention a number of troubling encounters he had with Mr. Eric Johnson, the Chief of Staff for my political opponent, Mr. Patrick Murphy. These facts call into question the integrity and propriety of the OCE's investigation.

Mr. Keith notified me that sometime in July of 2015, Mr. Keith encountered Mr. Johnson in Washington, D.C. at which point Mr. Johnson told Mr. Keith that the OCE was "going after your boss." This conversation between Mr. Keith and Mr. Johnson took place shortly after I hired Mr. Keith to assist with my Senate campaign and around the time the OCE initiated this investigation. Mr. Keith notified me that Mr. Johnson made these statements to him with an intimidating tone.

Mr. Keith further notified me that, approximately a month before my interview with the OCE, Mr. Johnson again called Mr. Keith and told him that "this ethics stuff is going to be getting really bad." The day of my OCE interview, Mr. Johnson and Mr. Keith spoke by phone, and Mr. Johnson asked Mr. Keith how my OCE interview went. Mr. Johnson then called Mr. Keith back later that day on or about 5:58 p.m. and warned Mr. Keith that his name was raised during my OCE interview.

Mr. Keith's name was in fact raised during my OCE interview — a fact that no one could have known except for me, my attorneys, and the OCE's staff. No other persons were present during the interview or reviewed any confidential transcript of the interview. As detailed in my prior correspondence with you, several facts about the time, place, and content of my OCE interview were leaked to the press and appeared in news articles. Mr. Murphy and his campaign staff have used those articles as a part of their Senate campaign. Mr. Johnson's communications with Mr. Keith therefore raises serious questions as to whether Mr. Murphy's staff is obtaining confidential information from the OCE staff and using it for partisan political purposes in direct conflict with the OCE's goal of complete impartiality.

In addition, ██████████ notified me recently that several weeks ago a large Democratic Senate Campaign Committee ("DSCC") donor told him that DSCC Chairman Senator Jon Tester had told the donor that ██████████ was an investor in the Grayson Fund. I have never disclosed any facts concerning a connection between ██████████ and the Grayson Fund, and the only time his name has been associated with the Fund was during my OCE interview due to the OCE's belief that ██████████ was an investor in the Fund. I have gone to great lengths in this investigation to keep the identity of outside investors in the Grayson Fund confidential, as I am bound to do so pursuant to my confidentiality obligations with the Grayson Fund. Again, the only persons that would know about any alleged connection between ██████████ and the Fund are myself, my attorneys, the Fund's employees and administrators, and the OCE's staff. My attorneys and the Fund's employees and administrators have never disclosed any relationship between ██████████ and the Fund, nor have I.

The above revelation from ██████████ is further evidence that your staff has breached its duty of confidentiality under applicable law, and is also evidence that such breaches of confidentiality are being used by my political opponent directly to influence the Florida Senate race and potential donors. That any such belief concerning ██████████ was disclosed to third parties, especially DSCC donors, raises grave concerns regarding the impartiality of the investigation.

Accordingly, I request that the OCE Board conduct a thorough investigation of these allegations.

Additionally, Rule 5 of the OCE's Rules of Conduct provides that the:

Office staff shall be impartial and unbiased in the conduct of an investigation....
In the event that a staff person has a personal or professional relationship with a subject, a subject's opponent in any election or a witness involved in an investigation, staff shall disclose that fact to the Staff Director who shall disclose it to the Board. Office staff shall notify the Staff Director and shall immediately discontinue working on an investigation in the event s/he feels s/he cannot be impartial and unbiased. If the Board believes that a staff person cannot be unbiased and impartial, the Board shall terminate that person's involvement in the matter.

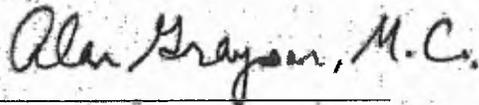
(emphasis added). Any staff member who leaked confidential information regarding [REDACTED] to my political opponent or the DSCC for whatever reason, including dissemination to the press and potential DSCC donors is, without question, partial and biased and should have been terminated from the investigation.

These leaks of confidential information also call into question the breadth of the OCE's investigation. The OCE sought tax returns and business records from myself, my colleagues, and my family members for periods dating back to before the time when OCE even existed, as opposed to narrow requests of financial records that the OCE could use to verify information disclosed on my Personal Financial Disclosure forms. Mr. Murphy has never publicly disclosed his tax returns or all of his business dealings, and would benefit from using the OCE as a tool to obtain confidential information concerning me, my family, and friends that Mr. Murphy could not acquire through other lawful means.

I understand that 18 U.S.C. § 1001 applies to the information that I am providing. To the best of my ability, I affirm that the evidence submitted was not obtained in violation of any law, rule or regulation.

Please respond to me as soon as possible verifying that the OCE's Board will investigate the matters described herein and take all appropriate action.

Sincerely,



Rep. Alan Grayson

RESPONSE

EXHIBIT 6



< Messages (6)

Eric

Details

Eric this is my new phone.

David Keith

Hey got it

You well? Anything new?

I'm good. Nyt contracted us yesterday. Looks ugly. WH moving forward. Should have something soon

Contacted

Yikes

Well let me know!

Delivered



RESPONSE

EXHIBIT 7

Schedule K-1
(Form 1065)

2013

Department of the Treasury
Internal Revenue Service

For calendar year 2013, or tax
year beginning _____, 2013
ending _____

Final K-1

Amended K-1

651113
OMB No. 1545-0099

Partner's Share of Income, Deductions, Credits, etc.
▶ See separate instructions.

Part I Information About the Partnership	
A Partnership's employer identification number	35-2411257
B Partnership's name, address, city, state, and ZIP code	GRAYSON FUND GENERAL PARTNER LLC ALAN M GRAYSON MBR 4705 S APOPKA-VINELAND RD. # 110 ORLANDO, FL 32819
C IRS Center where partnership filed return	CINCINNATI, OH
D <input type="checkbox"/> Check if this is a publicly traded partnership (PTP)	
Part II Information About the Partner	
E Partner's identifying number	[REDACTED]
F Partner's name, address, city, state, and ZIP code	ALAN M GRAYSON 4415 GWYNDALE COURT ORLANDO, FL 32837
G <input type="checkbox"/> General partner or LLC member-manager	<input checked="" type="checkbox"/> Limited partner or other LLC member
H <input checked="" type="checkbox"/> Domestic partner	<input type="checkbox"/> Foreign partner
I1 What type of entity is this partner?	INDIVIDUAL
I2 If this partner is a retirement plan (IRA/SEP/Keogh/etc), check here (see instructions)	<input type="checkbox"/>
J Partner's share of profit, loss, and capital (see instructions):	
	Beginning Ending
Profit	50.00000 % 50.00000 %
Loss	50.00000 % 50.00000 %
Capital	50.00000 % 50.00000 %
K Partner's share of liabilities at year end:	
Nonrecourse	\$ _____
Qualified nonrecourse financing	\$ _____
Recourse	\$ _____
L Partner's capital account analysis:	
Beginning capital account	\$ 1,518.
Capital contributed during the year	\$ 1,103.
Current year increase (decrease)	\$ -582.
Withdrawals and distributions	\$ _____
Ending capital account	\$ 2,039.
<input type="checkbox"/> Tax basis	<input checked="" type="checkbox"/> GAAP
<input type="checkbox"/> Other (explain)	<input type="checkbox"/> Section 704(b) book
M Did the partner contribute property with a built-in gain or loss?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If 'Yes', attach statement (see instructions)	

Part III Partner's Share of Current Year Income, Deductions, Credits, and Other Items			
1	Ordinary business income (loss)	15	Credits
			-484.
2	Net rental real estate income (loss)		
3	Other net rental income (loss)	16	Foreign transactions
4	Guaranteed payments		
5	Interest income		
6a	Ordinary dividends		2.
6b	Qualified dividends		2.
7	Royalties		
8	Net short-term capital gain (loss)		64.
9a	Net long-term capital gain (loss)	17	Alternative minimum tax (AMT) items
			-142.
9b	Collectibles (28%) gain (loss)		
9c	Unrecaptured section 1250 gain		
10	Net section 1231 gain (loss)	18	Tax-exempt income and nondeductible expenses
11	Other income (loss)		
12	Section 179 deduction		
13	Other deductions		
H		17.	
K		6.	A 2.
14	Self-employment earnings (loss)		B 6.
19	Distributions		
20	Other information		

*See attached statement for additional information.

FOR IRS USE ONLY

RESPONSE

EXHIBIT 8

K. Michael Conaway, Texas
Chairman
Linda T. Sánchez, California
Ranking Member



Thomas A. Rust
Staff Director and Chief Counsel

Joanne White
Administrative Staff Director

Jackie M. Barber
Counsel to the Chairman

Daniel J. Taylor
Counsel to the Ranking Member

Charles W. Dent, Pennsylvania
Patrick Meehan, Pennsylvania
Trey Gowdy, South Carolina
Susan W. Brooks, Indiana

ONE HUNDRED THIRTEENTH CONGRESS

U.S. House of Representatives

COMMITTEE ON ETHICS

October 6, 2014

1015 Longworth House Office Building
Washington, D.C. 20515-6328
Telephone: (202) 225-7103
Facsimile: (202) 225-7392

Pedro R. Pierluisi, Puerto Rico
Michael E. Capuano, Massachusetts
Yvette D. Clarke, New York
Ted Deutch, Florida

OCT 7 2014
REC'D

The Honorable Alan M. Grayson
U.S. House of Representatives
430 Cannon House Office Building
Washington, DC 20515

Dear Colleague:

A copy of your 2013 Financial Disclosure Statement, recently filed with the Clerk of the House, has been forwarded to this Committee for review. Examination of your Statement suggests the need for additional information as noted on the enclosed checklist. Based on information reported on your Statement, you must also submit a Periodic Transaction Report (PTR). Please submit any necessary additional information and PTR to the Clerk of the House **within 30 days of the date of this letter.**

You may submit any necessary additional information by using the electronic filing system, writing a letter addressed to the Clerk which identifies the section(s) of the Statement that you are supplementing or by completing a new paper Statement and indicating in the appropriate place that it is an amendment. You may obtain a blank Statement for this purpose from the Committee's Web site at <http://ethics.house.gov> in the "Financial Disclosure" section. The additional information should be submitted to the Legislative Resource Center either electronically or in paper to Room 135 Cannon House Office Building, Washington, DC 20515.

Furthermore, your Statement discloses that you purchased or sold the securities listed in the enclosed checklist, however there is no record that you submitted a Periodic Transaction Report (PTR) for these transactions. Therefore, you must also file a PTR or contact the Committee with an explanation for why these transactions were not reported on a PTR. You may obtain a PTR form from the Legislative Resource Center or by visiting the Committee's website at <http://ethics.house.gov/> and clicking on the "Financial Disclosure" link.

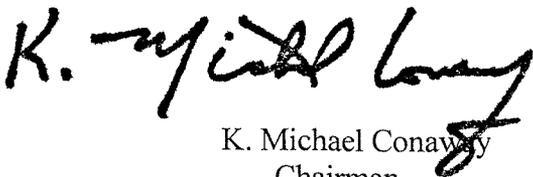
Because any late PTR that is submitted without a required late filing fee is deemed procedurally deficient and not properly filed, you must also enclose with your completed PTR a check or money order made payable to the United States Treasury in the amount of \$200. The late filing fee may be waived by the Committee in "extraordinary circumstances." The Committee encourages you to seek a waiver. If you would like to request such a waiver, you may do so by sending a separate written request directly to the Committee setting forth the reasons such a waiver should be granted. The Committee will not consider any request for a waiver of the late filing unless and until you have filed your PTR, along with a check or money order for the \$200 filing fee, with the Legislative Resource Center.

RepGrayson_00000128

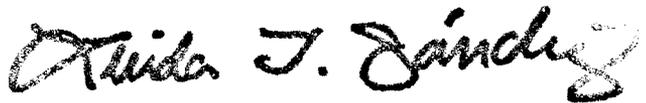
Please note that any person who knowingly and willfully fails to file or report any required information, or who knowingly and willfully falsifies any information such person is required to report, may be assessed a civil penalty of up to \$50,000 and subjected to criminal prosecution, under section 104(a) of the EIGA. In addition, the EIGA requires the Committee to refer to the Attorney General the name of any individual for whom it has reasonable cause to believe has willfully failed to file a Statement or has willfully falsified or willfully failed to file information required to be reported.

Therefore, you must promptly file the requested additional information to the 2013 Financial Disclosure Statement and the PTR or provide the Committee with information regarding why the reports are not required in order to comply with the EIGA. If you have any questions concerning the proper completion of the required reports or if you do not agree that a report is required, please contact the Committee at (202) 225-7103. Committee Staff is also available to review the amendment prior to filing. If you would like such a review, please fax your request to (202) 225-3713.

Sincerely,



K. Michael Conaway
Chairman



Linda T. Sánchez
Ranking Member

KMC/LTS:tn

Enclosure

CY 2013 FINANCIAL DISCLOSURE CHECKLIST: MEMBERS, CANDIDATES, OFFICERS & EMPLOYEES

Name: Grayson, Alan, MC
Filer Status: MC
Type of Report: Annual rec'd 8/12/2014

FIRST / SIGNATURE PAGE

- 1. Filer information incomplete or insufficient
- 2. Preliminary Information box (es) not checked
- 3. Trust holdings and/or spouse/dependent Exemption box(es) not checked
- 4. Trust/Spouse Exemption box (es) marked "yes"
- 5. Statement not properly signed or dated
- 6. Other

SCHEDULE A. ASSETS & "UNEARNED" INCOME

- 1. Box on page 1 checked "yes" but no data reported
- 2. Trusts box on p. 1 marked "yes" but no trust reported
- 3. Identity not properly reported
 - a. Incomplete fund or other asset name
 - b. Real estate identification not provided/insufficient
 - c. Private business – type / location not provided
- 4. Value of asset not properly reported
- 5. Type and/or Amount of Income not properly shown
- 6. Capital gains on sale reported to exceed \$200 on Sch. B are not consistently reported on Sch. A
- 7. Fund/IRA/401k/trust underlying assets not reported
- 8. Type of life insurance not properly reported
- 9. Other

SCHEDULE B. TRANSACTIONS

- 1. Box on page 1 checked "yes" but no data reported
- 2. Account identity not properly shown
- 3. Type of transaction (P, S, E) not properly shown
- 4. Date not properly shown
- 5. Category of value not properly shown
- 6. New/old holding not shown as acquisition/sale
- 7. Listed asset not shown on Sch. A
- 8. Other

SCHEDULE C. EARNED INCOME

- 1. Box on page 1 checked "yes" but no data reported
- 2. Source and/or type not properly shown
- 3. Gross amount not properly shown
- 4. Outside earned income limit exceeded (i.e., \$26,955)
- 5. Teaching Fee – no approval letter filed
- 6. Other

SCHEDULE D. LIABILITIES

- 1. Box on page 1 checked "yes" but no data reported
- 2. Creditor/Type of Liability not sufficiently identified
- 3. Date Liability Incurred not provided/insufficient
- 4. Amount of Liability not properly reported
- 5. Mortgaged property not listed on Sch. A
- 6. Other

SCHEDULE E. POSITIONS

- 1. Box on page 1 checked "yes" but no data reported
- 2. Position(s) not sufficiently identified
- 3. Organization not sufficiently identified
- 4. Other

SCHEDULE F. AGREEMENTS

- 1. Box on page 1 checked "yes" but no data reported
- 2. More detail needed on agreements
- 3. Future employment agreements or jobs accepted while in office not reported
- 4. Other

SCHEDULE G. GIFTS [N/A FOR NEW MEMBERS]

- 1. Box on page 1 checked "yes" but no data reported
- 2. Source/description not sufficient
- 3. Value not properly reported
- 4. Gift appears not to be acceptable under gift rule
- 5. Other

SCHEDULE H. TRAVEL [N/A FOR NEW MEMBERS]

- 1. Box on page 1 checked "yes" but no data reported
- 2. Source not sufficient
- 3. Dates of travel not reported
- 4. Description/itinerary not sufficient
- 5. Food/lodging/personal days response insufficient
- 6. 4/7 day limit on private travel exceeded
- 7. No record of travel pre-approval(s) by Committee
- 8. Travel approval granted but trip(s) not reported
- 9. Other

SCHEDULE I. PAYMENTS MADE TO CHARITY IN LIEU OF HONORARIA

- 1. Payments in lieu of honoraria not reported properly
- 2. Limit of \$2,000 per event exceeded
- 3. Confidential list of charities not received (i.e., separate sealed green envelope)
- 4. Other

SCHEDULE J. COMPENSATION IN EXCESS OF \$5,000

- 1. Box on page 1 checked "yes" but no data reported
- 2. Source not sufficiently identified
- 3. Description of duties not sufficient
- 4. Other

NO EXCEPTIONS WERE NOTED

Detail on Checked Item(s):

B-6: An asset reported on Schedule A was not reported as owned in the preceding FD and is not reported as purchased on Schedule B.

- Barclay iPath S&P 500 Vix ETF
- Idt C/b Stock*
- Gevie Energy Stock *
- Straight Path Stock*

CY 2013 FINANCIAL DISCLOSURE CHECKLIST: MEMBERS, CANDIDATES, OFFICERS & EMPLOYEES

B-7: An asset reported as sold on Schedule B is not reported as having been owned on Schedule A in 2012 or in 2013, and sale reported as having occurred before purchases on Schedule B.

- DC—Dinexion Daily Real Estate ETF

D-6: The following liabilities were reported on the previous FD, but are not shown on Schedule D.

- Wells Fargo—Feb 1994--\$250k - \$500k
- Citi—Feb 1997--\$250k - \$500k
- PNC Bank—Feb 1996--\$100k - \$250k

H-8: Committee-approved trips were not listed on FD:

- 1/23-1/25 to Pikesville, MD, sponsored by Progressive Congress
- 10/4-10/5 to Los Angeles, CA, sponsored by Real Time with Bill Maher

PTRs: Several PTRs were not submitted for assets reported on the transaction report:

- Silver Standard Stock, S, 10/17/13, (DC)
- China Mobile Options 1/15 50, P, 10/22/2013
- American Capital Stock
 - S, 6/25/2013
 - S, 6/24/2013, (w/DC)
 - S, 6/25/2013
- Northern Tier Stock, P, 7/15/2013
- Jaguar Stock, S, 10/7/2013, (w.DC)

* Transactions involving these securities may also trigger a PTR requirement.

dsr

RESPONSE

EXHIBIT 9

K. Michael Conaway, Texas
Chairman
Linda T. Sánchez, California
Ranking Member



ONE HUNDRED THIRTEENTH CONGRESS

U.S. House of Representatives

COMMITTEE ON ETHICS

Daniel A. Schwager
Staff Director and Chief Counsel

Joanne White
Administrative Staff Director

Jackie M. Barber
Counsel to the Chairman

Daniel J. Taylor
Counsel to the Ranking Member

1015 Longworth House Office Building
Washington, D.C. 20515-6328
Telephone: (202) 225-7103
Facsimile: (202) 225-7392

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Trey Gowdy, South Carolina
Susan W. Brooks, Indiana

Pedro R. Pierluisi, Puerto Rico
Michael E. Capuano, Massachusetts
Yvette D. Clarke, New York
Ted Deutch, Florida

September 17, 2013

The Honorable Alan M. Grayson
U.S. House of Representatives
430 Cannon House Office Building
Washington, DC 20515

SEP 17 2013

Dear Colleague:

A copy of your 2012 Financial Disclosure Statement, recently filed with the Clerk of the House, has been forwarded to this Committee for review. Examination of your Statement suggests the need for additional information or other amendment as noted on the enclosed checklist.

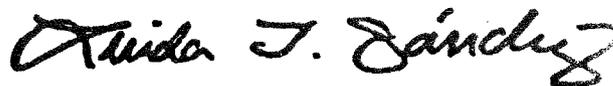
Please submit an original and one copy of any necessary amendment to the Clerk of the House **within 30 days of the date of this letter**. Please be advised that pursuant to section 104(d)(1) of the Ethics in Government Act of 1978 (EIGA), any individual filing a required Statement, including amendments, more than 30 days after the due date shall pay a \$200 late filing fee to the United States Treasury. In addition, any individual who knowingly and willfully fails to file or falsifies any Statement required under the EIGA may be assessed a maximum civil penalty of up to \$50,000 and subjected to criminal prosecution. Therefore, you must promptly file the requested amendment to comply with the statutory requirement.

You may amend your Financial Disclosure Statement either by a letter addressed to the Clerk which identifies the section(s) of the Statement that you are amending or by completing a new Statement and indicating in the appropriate place that it is an amendment. You may obtain a blank Statement for this purpose from the Committee's Web site at <http://ethics.house.gov> in the "Financial Disclosure" section. The amendment should be submitted to the Legislative Resource Center in Room B-106 Cannon House Office Building, Washington, DC 20515.

If you have any questions concerning proper completion of the amendment or do not agree that your Statement requires an amendment, please contact the Committee at (202) 225-7103. Committee Staff is also available to review the amendment prior to filing. If you would like such a review, please fax your request to (202) 225-3713.

Sincerely,


K. Michael Conaway
Chairman



Linda T. Sánchez
Ranking Member

Enclosure

KMC/LTS:haj

RepGrayson_00000139

CY 2012 FORM A CHECKLIST: MEMBERS, OFFICERS & EMPLOYEES

Name: **Grayson, Alan, MC**
 Filer Status: **MC**
 Type of Report: **Annual rec'd 8/20/2013**

FIRST / SIGNATURE PAGE

- 1. Filer information incomplete or insufficient
- 2. Preliminary Information box (es) not checked
- 3. Trust holdings and/or spouse/dependent Exemption box(es) not checked
- 4. Trust/Spouse Exemption box (es) marked "yes"
- 5. Statement not properly signed or dated
- 6. Other

SCHEDULES I. & II. EARNED INCOME AND PAYMENTS TO CHARITY IN LIEU OF HONORARIA

- 1. Box on page 1 checked "yes" but no data reported
- 2. Source and/or type not properly shown
- 3. Gross amount not properly shown
- 4. Outside earned income limit exceeded (i.e., \$26,955)
- 5. Teaching Fee – no approval letter filed
- 6. Payments in lieu of honoraria not reported properly
- 7. Limit of \$2,000 per event exceeded
- 8. Confidential list of charities not received (i.e., separate sealed green envelope)
- 9. Other

SCHEDULE III. ASSETS & "UNEARNED" INCOME

- 1. Box on page 1 checked "yes" but no data reported
- 2. Trusts box on p. 1 marked "yes" but no trust reported
- 3. Identity not properly reported
 - a. Incomplete fund or other asset name
 - b. Real estate identification not provided/insufficient
 - c. Private business – type / location not provided
- 4. Value of asset not properly reported
- 5. Type and/or Amount of Income not properly shown
 - Dacha Stock
 - VMS
 - WSW Exchange Fund Units
- 6. Capital gains on sale reported to exceed \$200 on Sch. IV are not consistently reported on Sch. III
- 7. Fund/IRA/401k/trust underlying assets not reported
- 8. Type of life insurance not properly reported
- 9. Other

SCHEDULE IV. TRANSACTIONS

- 1. Box on page 1 checked "yes" but no data reported
- 2. Account identity not properly shown
- 3. Type of transaction (P, S, E) not properly shown
- 4. Date not properly shown
- 5. Category of value not properly shown
- 6. New/old holding not shown as acquisition/sale
- 7. Listed asset not shown on Sch. III
- 8. Other

SCHEDULE V. LIABILITIES

- 1. Box on page 1 checked "yes" but no data reported
- 2. Creditor/Type of Liability not sufficiently identified

- 3. Date Liability Incurred not provided/insufficient
- 4. Amount of Liability not properly reported
- 5. Mortgaged property not listed on Sch. III
- 6. Other

SCHEDULE VI. GIFTS [N/A FOR NEW MEMBERS]

- 1. Box on page 1 checked "yes" but no data reported
- 2. Source/description not sufficient
- 3. Value not properly reported
- 4. Gift appears not to be acceptable under gift rule
- 5. Other

SCHEDULE VII. TRAVEL [N/A FOR NEW MEMBERS]

- 1. Box on page 1 checked "yes" but no data reported
- 2. Source not sufficient
- 3. Dates of travel not reported
- 4. Description/itinerary not sufficient
- 5. Food/lodging/personal days response insufficient
- 6. 4/7 day limit on private travel exceeded
- 7. No record of travel pre-approval(s) by Committee
- 8. Travel approval granted but trip(s) not reported
- 9. Other

SCHEDULE VIII. POSITIONS

- 1. Box on page 1 checked "yes" but no data reported
- 2. Position(s) not sufficiently identified
- 3. Organization not sufficiently identified
- 4. Other

SCHEDULE IX. AGREEMENTS

- 1. Box on page 1 checked "yes" but no data reported
- 2. More detail needed on agreements
- 3. Future employment agreements or jobs accepted while in office not reported
- 4. Other

NO EXCEPTIONS WERE NOTED

Detail on Checked Items:

III-3a: Please identify the holder of each of the asset shown on Schedule III separately.

- Cash and balances--\$5million to \$25 million (pg. 3)
- Yamaha Stock and Vista Stock—income appears to exceed the sale amount on Schedule IV.

III-3a: Please provide the strike price and dates for each of the assets listed on Schedule III.

- Amer Elec options
- Mergan Options
- Lilly Options
- Merch Options

CY 2012 FORM A CHECKLIST: MEMBERS, OFFICERS & EMPLOYEES

- 3M options
- US Bank options

III-4: If the following asset has been fully sold (see sale reported on Schedule IV), its value should be reported as “None” on Schedule III (if its total income exceeded \$200).

- Yamaha Stock

III-5: The type or amount of income is not properly shown for the following assets:

- Dacha Stock
- VMS
- WSW Exchange Fund Units

IV-3: Several assets shown on Schedule IV are not annotated in Block E, Schedule III (see pages 2 & 3).

IV-6: An asset reported on Schedule III was not reported as owned in the preceding FD and is not reported as purchased on Schedule IV.

- CVS Stock
- Atlanta Stock
- Grocom Stock
- Restaurant Brands Stock
- Newson Stock
- Chancellor Stock
- Yamana Stock
- Fast Food Stock
- Silver Standard Stock
- Thompson Creek Stock
- Taseleo Stock

IV-6: An asset reported as owned in the preceding FD is not reported as owned on Schedule III and is not reported as sold on Schedule IV.

- Several assets listed for the “DC” on pages 17-18 of prior FD.

IV-7: An asset reported as purchased on Schedule IV is not reported as owned on Schedule III and not reported as sold on Schedule IV.

- DC—Dacha Stock

IV-7: An asset reported as sold on Schedule IV is not reported as having been owned on Schedule III and is not reported as previously purchased on Schedule IV.

- DC—Vista Stock

dsr

RESPONSE

EXHIBIT 10

ALAN GRAYSON
9TH DISTRICT, FLORIDA

COMMITTEE ON FOREIGN AFFAIRS
SUBCOMMITTEE ON
WESTERN HEMISPHERE
SUBCOMMITTEE ON
MIDDLE EAST AND NORTH AFRICA

COMMITTEE ON SCIENCE, SPACE,
AND TECHNOLOGY
SUBCOMMITTEE ON ENERGY
SUBCOMMITTEE ON ENVIRONMENT
REGIONAL DEMOCRATIC WHIP

Congress of the United States
House of Representatives
Washington, DC 20515-0909

2014 DEC -3 AM 10:48
COMMITTEE ON ETHICS

December 2, 2014

430 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-9889

ORLANDO DISTRICT OFFICE
5842 SOUTH SEMORAN BOULEVARD
ORLANDO, FL 32822
(407) 615-8889

KISSIMMEE DISTRICT OFFICE
101 NORTH CHURCH STREET
SUITE 550
KISSIMMEE, FL 34731
(407) 518-4983

grayson.house.gov

Committee on Ethics
U.S. House of Representatives
Washington, DC 20515

Dear Committee:

This is in response to your letter dated October 6, 2014. Your staff informed my Chief of Staff that there is a 30-day grace period for responding to such letters. This response is filed within the grace period, which ends on Dec. 5, 2014.

Your letter concerns my 2013 Financial Disclosure Statement. It enumerates certain items on a checklist for which additional information is requested. That information is provided below, by checklist item:

B-7: When there is a "short sale" of a security, rather than being purchased and then sold, it is sold and then purchased. (If the price of the security drops, this yields a profit.) Thus in the case of short sales, the sale is reported before the purchase. There is no purchase that takes place before the sale.

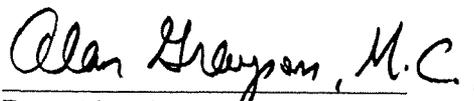
D-6: The Wells Fargo liability (mortgage) is shown on Schedule D. The Citi and PNC Bank liabilities (mortgages) were paid off.

H-8: The Progressive Congress trip is shown on Schedule H. The Real Time trip was inadvertently omitted, and an amended Schedule H adding that trip is being filed.

PTRs: American Capital stock transactions were reported on the Periodic Transaction Report dated July 9, 2013. It appears that the other listed transactions were disclosed on the 2013 Financial Disclosure Statement, but inadvertently omitted from the Periodic Transaction Reports. Amended Periodic Transaction Reports adding these transactions are being filed.

Thank you very much for your consideration of these matters.

Sincerely,


Rep. Alan Grayson

ALAN GRAYSON
9TH DISTRICT, FLORIDA

COMMITTEE ON FOREIGN AFFAIRS
SUBCOMMITTEE ON
WESTERN HEMISPHERE
SUBCOMMITTEE ON
MIDDLE EAST AND NORTH AFRICA

COMMITTEE ON SCIENCE, SPACE,
AND TECHNOLOGY
SUBCOMMITTEE ON ENERGY
SUBCOMMITTEE ON ENVIRONMENT
REGIONAL DEMOCRATIC WHIP

Congress of the United States
House of Representatives
Washington, DC 20515-0909

430 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-9889

ORLANDO DISTRICT OFFICE
5842 SOUTH SEMORAN BOULEVARD
ORLANDO, FL 32822
(407) 615-8889

KISSIMEE DISTRICT OFFICE
101 NORTH CHURCH STREET
SUITE 550
KISSIMEE, FL 34731
(407) 518-4983

grayson.house.gov

January 13, 2014

K. Michael Conaway, Chairman
Linda T. Sanchez, Ranking Member
Committee on Ethics
U.S. House of Representatives
1015 Longworth H.O.B.
Washington, DC 20515

LEGISLATIVE RESOURCE CENTER
2014 JAN 14 PM 2:37
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

Dear Chairman and Ranking Member:

This is in response to your letter to me dated September 17, 2013, regarding my 2012 Financial Disclosure Statement. Your letter requested a response within 30 days. Before that time was up, I requested a 90-day extension. Therefore, this response is timely.

Your letter contained nine comments on my Disclosure. These comments are repeated below, interleaved with my responses.

*III-3a: Please identify the holder of the asset shown on Schedule III separately.
Cash and balances - \$5 million to \$25 million (pg. 3)
Yamaha Stock and Vista Stock – income appears to exceed the sale amount in
Schedule IV.*

If by “holder,” the committee means the institutions that were holding the cash balances, they were Suntrust, PNC Bank, Capital One, GE Capital, American Express Bank, Venture Bank, RF Lafferty, Texas Capital Bank, EuroPacific, Fidelity, TD Ameritrade and Merrill Lynch.

Regarding the Yamana stock, the income reported on Page 3 exceeded the sale amount on Schedule IV because, as stated, the income included both capital gains and dividends.

Regarding the Vista stock, the reported income does not exceed the sale amount in Schedule IV.

III-3a: Please provide the strike price and dates for each of the assets listed on Schedule III.

- *Amer Elec options*
- *Morgan Options*
- *Lilly Options*
- *Merch Options*
- *3M options*
- *US Bank options*

- Amer Elec options – strike price 35, date 1/19/13.
- Morgan Options – strike price 50, date 1/19/13.
- Lilly Options – strike price 40, date 1/19/13.
- Merck Options – strike price 35, date 1/19/13.
- 3M options – strike price 95, date 1/19/13.
- US Bank options – strike price 30, date 1/19/13.

III-4: If the following asset has been fully sold (see sale reported on Schedule IV), its value should be reported as “None” on Schedule III (if its total income exceeded \$200).

- *Yamaha Stock*

This asset was not fully sold.

III-5: The type or amount of income is not properly shown for the following assets:

- *Dacha Stock*
- *VMS*
- *WSW Exchange Fund Units*

The type and amount of income for Dacha stock are reported on Page 3. The type and amount of income for VMS Ventures stock and WSW Exchange Fund Units are reported on Page 4.

IV-3: Several assets shown on Schedule IV are not annotated in Block E, Schedule III (see pages 2 & 3).

There were no reportable assets exchanged during the reporting period. All reportable purchases and sales are reported on Schedule IV.

IV-6 An asset reported on Schedule III was not reported as owned in the preceding FD and is not reported as purchased on Schedule IV.

- *CVS Stock*
- *Atlanta Stock*
- *Grocom Stock*
- *Restaurant Brands Stock*
- *Newson Stock*
- *Chancellor Stock*
- *Yamaha Stock*
- *Fast Food Stock*
- *Silver Standard Stock*
- *Thompson Creek Stock*
- *Taseleo Stock*

- *CYS Stock – previous disclosure as “Cypress stock”.*
- *Atlatsa Stock – previous disclosure on Page 18.*
- *Geocom Stock – previous disclosure on page 18.*
- *Restaurant Brands Stock– previous disclosure on Page 17.*
- *Nevsun Stock – previous disclosure on Page 17.*
- *Chancellor Stock – not reportable previously; worth less than \$1000 and generated no income.*
- *Yamana Stock – previous disclosure on Page 5.*
- *Fast Food Stock – previous disclosure as “Fast Food Indonesia stock”.*
- *Silver Standard Stock – previous disclosure as part of “Grayson Fund interest.”*
- *Thompson Creek Stock– previous disclosure as part of “Grayson Fund interest.”*
- *Taseko Stock– previous disclosure as part of “Grayson Fund interest.”*

IV-6 An asset reported as owned in the preceding FD is not reported as owned on Schedule III and is not reported as sold on Schedule IV.

- *Several assets listed for the “DC” on pages 17-18 of prior FD.*

As the disclosure instructions indicate, the “SP, DC, JT” disclosure is voluntary. In the preceding disclosure, I elected to make such disclosure. In the 2012 Financial Disclosure Statement, I elected not to make such disclosure. Nevertheless, all assets for dependent children that are required to be disclosed have been listed; they simply aren’t designated as “DC” any longer.

IV-7: An asset reported as purchased on Schedule IV is not reported as owned on Schedule III and not reported as sold on Schedule IV.

- *DC-Dacha Stock*

The sale of this asset is reported on Schedule IV on Page 7. The year-end value of the asset was zero.

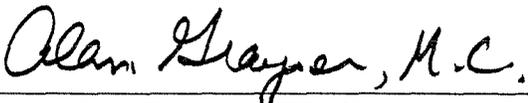
IV-7: An asset reported as sold on Schedule IV is not reported as having been owned on Schedule III and not reported as previously purchased on Schedule IV.

- *DC-Vista Stock*

This asset is reported on Schedule III on Page 3.

Thank you for your note. If you need any further information, please let me know.

Sincerely,



Rep. Alan Grayson (FL-9)

RESPONSE

EXHIBIT 11

and its residence, by obtaining advice from its own tax counsel or other advisor, and to file all appropriate tax returns that may be required.

The foregoing is a summary of some of the important tax rules and considerations affecting the Limited Partners, the Fund, and the Fund's proposed operations and does not purport to be a complete analysis of all relevant tax rules and considerations, nor does it purport to be a complete listing of all potential tax risks inherent in purchasing, or holding an interest in the Fund. Prospective Investors in the Fund are urged to consult their own tax advisors as to the federal and state tax consequences of their participation in the Fund.

IRS CIRCULAR 230 DISCLOSURE: TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE UNITED STATES INTERNAL REVENUE SERVICE, WE INFORM YOU THAT ANY TAX ADVICE CONTAINED IN THIS MEMORANDUM (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN BY THE FUND OR ITS COUNSEL TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING TAX-RELATED PENALTIES UNDER THE INTERNAL REVENUE CODE, OR (II) PROMOTING, MARKETING, OR RECOMMENDING TO ANOTHER PARTY ANY TAX-RELATED MATTER HEREIN.

REPORTS TO LIMITED PARTNERS

Audited financial statements will be prepared annually and generally furnished at the General Partner's discretion to Limited Partners within 120 days following the close of the Fund's calendar year, which ends on December 31, or as soon as reasonably practicable thereafter. Notwithstanding any other statement herein, the Fund's first audit will not be provided until after December 31, 2012 and will include the relevant portion of the Fund's fiscal calendar year for 2011 and all of the Fund's fiscal calendar year for 2012. A statement of each Limited Partner's Capital Account activity will be compiled and will be sent with the annual financial statements. The Fund may provide monthly unaudited reports to Limited Partners generally within 30 days of month end. Although not necessarily consistent with generally accepted accounting principles or such other industry accepted accounting standards, the Fund will not be required to provide to Limited Partners the Fund's portfolio holdings or, except as otherwise required in the Limited Partnership Agreement, any other information. However, the General Partner may disclose in its sole discretion, any Fund information, including Fund holdings, to any person, including, but not limited to, Limited Partners and outside parties. The General Partner may disclose varying amounts and levels of information among such persons. Limited Partners agree to keep confidential and not disclose or trade on (other than acquiring or redeeming Interests) any information received from the Fund, including, but not limited to, Fund holdings.

Except as described elsewhere in this Memorandum, financial information contained in all reports to the Limited Partners will be prepared on an accrual basis of accounting in accordance with United States generally accepted accounting principles or such other industry accepted accounting standards chosen by the General Partner unless otherwise indicated and will include, where applicable, a reconciliation of information furnished to the Limited Partners for income tax purposes. Federal tax information will be provided to the Limited Partners as soon as practicable after the end of each calendar year in accordance with federal reporting requirements.

INDEPENDENT PUBLIC ACCOUNTANTS

The General Partner will hire independent auditors for the Fund. The Fund currently intends, but is not required, to use McGladrey & Pullen LLP as its independent auditors. Such accountants will provide audit services and assistance and consultation in connection with review of filings which may be required by any governmental agencies. The Fund's engagement letter with its auditor may contain an arbitration clause and waiver of punitive damages which may limit the Fund's recourse against its auditor.

RESPONSE

EXHIBIT 12

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

Form 10-Q

(Mark One)

- QUARTERLY REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

For the quarterly period ended September 30, 2015

OR

- TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

For the transition period from to
Commission file number: 001-35781

CVR Refining, LP

(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction of
incorporation or organization)

37-1702463
(I.R.S. Employer
Identification No.)

2277 Plaza Drive, Suite 500
Sugar Land, Texas
(Address of principal executive offices)

77479
(Zip Code)

(281) 207-3200
(Registrant's telephone number, including area code)

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing requirements for the past 90 days. Yes No

Indicate by check mark whether the registrant has submitted electronically and posted on its corporate Web site, if any, every Interactive Data File required to be submitted and posted pursuant to Rule 405 of Regulation S-T (§232.405 of this chapter) during the preceding 12 months (or for such shorter period that the registrant was required to submit and post such files). Yes No

Indicate by check mark whether the registrant is a large accelerated filer, an accelerated filer, a non-accelerated filer, or a smaller reporting company. See the definitions of "large accelerated filer," "accelerated filer" and "smaller reporting company" in Rule 12b-2 of the Exchange Act.

Large accelerated filer Accelerated filer Non-accelerated filer Smaller reporting company

(Do not check if smaller reporting company.)

Indicate by check mark whether the registrant is a shell company (as defined by Rule 12b-2 of the Exchange Act).
Yes No

There were 147,600,000 common units outstanding at October 27, 2015.

CVR REFINING, LP AND SUBSIDIARIES
NOTES TO THE CONDENSED CONSOLIDATED FINANCIAL STATEMENTS

September 30, 2015

(unaudited)

(1) Formation of the Partnership, Organization and Nature of Business

CVR Refining, LP and subsidiaries (referred to as "CVR Refining" or the "Partnership") is an independent petroleum refiner and marketer of high value transportation fuels. CVR Refining is a Delaware limited partnership, formed in September 2012 by Coffeyville Resources, LLC (referred to as "CRLLC"), a wholly-owned subsidiary of CVR Energy, Inc. (referred to as "CVR Energy") in contemplation of an initial public offering. As of September 30, 2015, CRLLC owned 100% of the Partnership's general partner interest and approximately 66% of the Partnership's limited partner interests. As of September 30, 2015, Icahn Enterprises L.P. ("IEP") and its affiliates owned approximately 82% of CVR Energy.

Offerings of CVR Refining, LP

CVR Refining completed the initial public offering of its common units representing limited partner interests (the "Initial Public Offering") on January 23, 2013. The common units, which are listed on the NYSE, began trading on January 17, 2013 under the symbol "CVRR." On May 20, 2013, the Partnership completed an underwritten offering (the "Underwritten Offering") by selling additional common units to the public. In connection with the Underwritten Offering, American Entertainment Properties Corporation ("AEPC"), an affiliate of IEP, also purchased common units in a privately negotiated transaction with a subsidiary of CVR Energy, which was completed on May 29, 2013. Following the closing of the Underwritten Offering and sale of common units to AEPC, and prior to June 30, 2014, public security holders held approximately 29% of all outstanding limited partner interests (including common units owned by affiliates of IEP, representing approximately 4% of all outstanding limited partner interests), and CVR Refining Holdings, LLC ("CVR Refining Holdings") held approximately 71% of all outstanding limited partner interests.

On June 30, 2014, the Partnership completed a second underwritten offering (the "Second Underwritten Offering") by selling 6,500,000 common units to the public at a price of \$26.07 per unit. The Partnership utilized net proceeds of approximately \$164.1 million from the Second Underwritten Offering to redeem 6,500,000 common units from CVR Refining Holdings. Subsequent to the closing of the Second Underwritten Offering and through July 23, 2014, public security holders held approximately 33% of all outstanding limited partner interests, and CVR Refining Holdings held approximately 67% of all outstanding limited partner interests.

On July 24, 2014, the Partnership sold an additional 589,100 common units to the public in connection with the underwriters' exercise of their option to purchase additional common units. The Partnership utilized net proceeds of approximately \$14.9 million from the underwriters' exercise of their option to purchase additional common units to redeem an equal amount of common units from CVR Refining Holdings. Additionally, on July 24, 2014, CVR Refining Holdings sold 385,900 common units to the public in connection with the underwriters' exercise of their remaining option to purchase additional common units. CVR Refining Holdings received net proceeds of \$9.7 million.

Subsequent to the closing of the underwriters' option for the Second Underwritten Offering and as of September 30, 2015, public security holders held approximately 34% of all outstanding limited partner interests (including common units owned by affiliates of IEP, representing approximately 4% of all outstanding limited partner interests), and CVR Refining Holdings held approximately 66% of all outstanding limited partner interests. In addition, CVR Refining Holdings owns 100% of the Partnership's general partner, CVR Refining GP, LLC ("CVR Refining GP"), which holds a non-economic general partner interest.

The Partnership's general partner manages the Partnership's activities subject to the terms and conditions specified in the Partnership's partnership agreement. The operations of the general partner, in its capacity as general partner, are managed by its board of directors. Actions by the general partner that are made in its individual capacity are made by CVR Refining Holdings as the sole member of the Partnership's general partner and not by the board of directors of the general partner. The members of the board of directors of the Partnership's general partner are not elected by the Partnership's unitholders and are not subject to re-election on a regular basis. The officers of the general partner manage the day-to-day affairs of the business.

The Partnership has adopted a policy pursuant to which it will distribute all of the available cash it generates each quarter. The available cash for distribution for each quarter will be determined by the board of directors of the Partnership's general partner following the end of such quarter and will generally be distributed within 60 days of quarter end. The partnership

CVR REFINING, LP AND SUBSIDIARIES
NOTES TO THE CONDENSED CONSOLIDATED FINANCIAL STATEMENTS (Continued)

September 30, 2015

(unaudited)

corporate and administrative offices in Texas and Kansas. Selling, general and administrative expenses also include allocated share-based compensation from CVR Energy as discussed in Note 4 ("Share-Based Compensation"). Selling, general and administrative expenses exclude depreciation and amortization of approximately \$0.5 million for each of the three months ended September 30, 2015 and 2014. For the nine months ended September 30, 2015 and 2014, selling, general and administrative expenses exclude depreciation and amortization of approximately \$1.6 million and \$1.1 million, respectively.

(8) Long-Term Debt

Long-term debt was as follows:

	<u>September 30, 2015</u>	<u>December 31, 2014</u>
	(in millions)	
6.5% Senior Notes due 2022	\$ 500.0	\$ 500.0
Intercompany credit facility	31.5	31.5
Capital lease obligations	48.9	49.9
Total debt	<u>580.4</u>	<u>581.4</u>
Current portion of capital lease obligations	(1.6)	(1.4)
Long-term debt, net of current portion	<u>\$ 578.8</u>	<u>\$ 580.0</u>

2022 Senior Notes

The Partnership has \$500.0 million aggregate principal amount of 6.5% Senior Notes due 2022 (the "2022 Notes") outstanding, which were issued by CVR Refining, LLC ("Refining LLC") and Coffeyville Finance Inc. ("Coffeyville Finance") on October 23, 2012. The 2022 Notes were issued at par and mature on November 1, 2022, unless earlier redeemed or repurchased by the issuers. Interest is payable on the 2022 Notes semi-annually on May 1 and November 1 of each year, commencing on May 1, 2013.

The 2022 Notes contain customary covenants for a financing of this type that limit, subject to certain exceptions, the incurrence of additional indebtedness or guarantees, the creation of liens on assets, the ability to dispose of assets, the ability to make certain payments on contractually subordinated debt, the ability to merge, consolidate with or into another entity and the ability to enter into certain affiliate transactions. The 2022 Notes provide that the Partnership can make distributions to holders of its common units provided, among other things, it has a minimum fixed charge coverage ratio and there is no default or event of default under the 2022 Notes. As of September 30, 2015, the Partnership was in compliance with the covenants contained in the 2022 Notes.

At September 30, 2015, the estimated fair value of the 2022 Notes was approximately \$484.5 million. This estimate of fair value is Level 2 as it was determined by quotations obtained from a broker dealer who makes a market in these and similar securities.

Amended and Restated Asset Based (ABL) Credit Facility

The Partnership has a senior secured asset based revolving credit facility (the "Amended and Restated ABL Credit Facility") with a group of lenders and Wells Fargo Bank, National Association ("Wells Fargo"), as administrative agent and collateral agent. The Amended and Restated ABL Credit Facility has an aggregate principal amount of up to \$400.0 million with an incremental facility, which permits an increase in borrowings of up to \$200.0 million subject to receipt of additional lender commitments and certain other conditions. The proceeds of the loans may be used for capital expenditures and working capital and general corporate purposes of the Partnership and its subsidiaries. The Amended and Restated ABL Credit Facility provides for loans and letters of credit in an amount up to the aggregate availability under the facility, subject to meeting certain borrowing base conditions, with sub-limits of 10% of the total facility commitment for swingline loans and 90% of the total facility commitment for letters of credit. The Amended and Restated ABL Credit Facility is scheduled to mature on December 20, 2017.

The Amended and Restated ABL Credit Facility also contains customary covenants for a financing of this type that limit the ability of the Partnership and its subsidiaries to, among other things, incur liens, engage in a consolidation, merger, purchase or sale of assets, pay dividends, incur indebtedness, make advances, investments and loans, enter into affiliate transactions, issue

RESPONSE

EXHIBIT 13

UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

Form 10-Q



QUARTERLY REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

For the quarterly period ended September 30, 2015

OR



TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

For the transition period from _____ to _____

COMMISSION FILE NO.: 001-35612

Northern Tier Energy LP

(Exact name of registrant as specified in its charter)

Delaware

(State or other jurisdiction of incorporation or organization)

1250 W. Washington Street, Suite 300

Tempe, Arizona

(Address of principal executive offices)

80-0763623

(I.R.S. Employer Identification No.)

85281

(Zip Code)

(Registrant's telephone number including area code)

(602) 302-5450

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing requirements for the past 90 days. Yes No

Indicate by check mark whether the registrant has submitted electronically and posted on its corporate Web site, if any, every Interactive Data File required to be submitted and posted pursuant to Rule 405 of Regulation S-T (§ 232.405 of this chapter) during the preceding 12 months (or for such shorter period that the registrant was required to submit and post such files). Yes No

Indicate by check mark whether the registrant is a large accelerated filer, an accelerated filer, a non-accelerated filer, or a smaller reporting company. See the definitions of "large accelerated filer," "accelerated filer," and "smaller reporting company" in Rule 12b-2 of the Exchange Act.

Large Accelerated Filer

Accelerated Filer

Non-Accelerated Filer

Smaller Reporting Company

Indicate by check mark whether the registrant is a shell company (as defined in Rule 12b-2 of the Exchange Act). Yes No

As of November 3, 2015, Northern Tier Energy LP had 92,833,486 common units outstanding. The common units trade on the New York Stock Exchange under the ticker symbol "NTI."

**NORTHERN TIER ENERGY LP
NOTES TO CONDENSED CONSOLIDATED FINANCIAL STATEMENTS**

1. DESCRIPTION OF THE BUSINESS AND BASIS OF PRESENTATION

Description of the Business

Northern Tier Energy LP (“NTE LP” or the “Company”) is an independent downstream energy company with refining, retail and logistics operations that serve the Petroleum Administration for Defense District II (“PADD II”) region of the United States. NTE LP holds 100% of the membership interest in Northern Tier Energy LLC (“NTE LLC”). NTE LP is a master limited partnership (“MLP”) for U.S. federal income tax purposes.

NTE LP includes the operations of NTE LLC, St. Paul Park Refining Co. LLC (“SPPR”), Northern Tier Retail Holdings LLC (“NTRH”) and Northern Tier Oil Transport LLC (“NTOT”). NTRH is the parent company of Northern Tier Retail LLC (“NTR”) and Northern Tier Bakery LLC (“NTB”). NTR is the parent company of SuperAmerica Franchising LLC (“SAF”). SPPR owns a 17% interest in MPL Investments Inc. (“MPLI”) and a 17% interest in Minnesota Pipe Line Company, LLC (“MPL”). MPLI owns 100% of the preferred interest in MPL, which owns and operates a 465,000 barrel per day (“bpd”) crude oil pipeline in Minnesota (see Note 6). NTOT is a crude oil trucking business in North Dakota that collects crude oil directly from wellheads in the Bakken shale and transports it to regional pipeline and rail facilities.

Western Refining, Inc. (“Western Refining”) indirectly owns 100% of Northern Tier Energy GP LLC (“NTE GP”), the general partner of NTE LP, and 35,622,500 common units, or 38.4%, of NTE LP at September 30, 2015. The remaining balance of the NTE LP units are publicly traded.

As of September 30, 2015, the St. Paul Park refinery owned by SPPR, which is located in St. Paul Park, Minnesota, had total crude oil throughput capacity of 97,800 barrels per stream day. Refining operations include crude fractionation, catalytic cracking, hydrotreating, reforming, alkylation, sulfur recovery and a hydrogen plant. The refinery processes predominately North Dakota and Canadian crude oils into products such as gasoline, diesel, jet fuel, kerosene, asphalt, propane, propylene and sulfur. The refined products are sold primarily in the Upper Great Plains of the United States.

As of September 30, 2015, NTR operated 165 convenience stores under the SuperAmerica brand and SAF supported 102 franchised stores which also utilize the SuperAmerica brand. These 267 SuperAmerica stores are primarily located in Minnesota and Wisconsin and sell gasoline, merchandise and, in some locations, diesel fuel. There is a wide range of merchandise sold at the stores including prepared foods, beverages and non-food items. The merchandise sold includes a significant number of proprietary items. NTB prepares and distributes food products under the SuperMom’s Bakery brand primarily to SuperAmerica branded retail outlets.

Basis of Presentation

The accompanying unaudited condensed consolidated financial statements have been prepared in accordance with U.S. generally accepted accounting principles (“GAAP”) for interim financial information. Accordingly, they do not include all of the information and footnotes required by GAAP for complete financial statements. In the opinion of management, all adjustments (consisting of normal recurring accruals) considered necessary for a fair presentation of the results for the periods reported have been included. Operating results for the nine months ended September 30, 2015 are not necessarily indicative of the results that may be expected for the year ending December 31, 2015, or for any other period. The condensed consolidated balance sheet at December 31, 2014 has been derived from the audited financial statements of NTE LP at that date but does not include all of the information and footnotes required by GAAP for complete financial statements. The accompanying condensed consolidated financial statements should be read in conjunction with the Company’s 2014 Annual Report on Form 10-K.

2. SUMMARY OF PRINCIPAL ACCOUNTING POLICIES

The significant accounting policies set forth in Note 2 to the consolidated financial statements in the Company’s 2014 Annual Report on Form 10-K, appropriately represent, in all material respects, the current status of accounting policies and are incorporated herein by reference.

Principles of Consolidation

NTE LP is a Delaware limited partnership which consolidates all accounts of NTE LLC and its subsidiaries, including SPPR, NTRH and NTOT. All intercompany accounts have been eliminated in these condensed consolidated financial statements.

The Company’s common equity interest in MPL is accounted for using the equity method of accounting. Equity income from MPL represents the Company’s proportionate share of net income available to common equity owners generated by MPL.

The equity method investment is assessed for impairment whenever changes in facts or circumstances indicate a loss in value has occurred. When the loss is deemed to be other than temporary, the carrying value of the equity method investment is

RESPONSE

EXHIBIT 14



Ken Scudder <kenscudder@gmail.com>

Fwd: My contact info

10 messages

Kevin Franck <kevin.c.franck@gmail.com>
To: Ken Scudder <kenscudder@gmail.com>

Thu, Jul 9, 2015 at 9:29 AM

Can you touch base with these folks to do the computer check they want?

----- Forwarded message -----

From: **Gabe Piscione** <gabriel.piscione@huffingtonpost.com>
Date: Wed, Jul 8, 2015 at 4:22 PM
Subject: Re: My contact info
To: Basel Hamdan <basel.hamdan@huffingtonpost.com>
Cc: Kevin Franck <kevin.c.franck@gmail.com>, "Samara Mackereth (HuffPost Live)" <samara.mackereth@huffingtonpost.com>

Hi Kevin,

Thanks for helping us set up Rep. Grayson's appearance tomorrow. Would you or Rep. Grayson be available to run a webcam test at 9:45amET tomorrow morning? If not, please let me know when works best.

Additionally, would you prefer to use Google Hangouts (I can send instructions if needed) or Skype? Either is fine for us.

Thanks,

On Wed, Jul 8, 2015 at 2:47 PM, Basel Hamdan <basel.hamdan@huffingtonpost.com> wrote:
Thanks, Kevin.

Adding my colleagues Samara and Gabe who will send webcam instructions. We'll need to test the webcam in advance of tomorrow's 10:40am ET live hit with Rep. Grayson...

On Wed, Jul 8, 2015 at 2:26 PM, Kevin Franck <kevin.c.franck@gmail.com> wrote:

Kevin Franck
617-682-9392

--
Basel Hamdan
News Director, HuffPost Live
Twitter: @BaselYHamdan
Mobile: 914-575-9206

--

Gabriel Vincent Piscione

Associate Producer | HuffPost Live

(732) 682-8197 | @GabePiscione

Kevin Franck
617-682-9392

Ken Scudder <kenscudder@gmail.com>
To: Kevin Franck <kevin.c.franck@gmail.com>

Thu, Jul 9, 2015 at 9:49 AM

We're going to use the Congressman's laptop, so not sure exactly how to do it while he's there...

[Quoted text hidden]

--
Ken Scudder

Writer, Communications Trainer, Crisis Communication Consultant, Message Development Expert

Kevin Franck <kevin.c.franck@gmail.com>
To: Ken Scudder <kenscudder@gmail.com>

Thu, Jul 9, 2015 at 9:52 AM

come in in 5. He should be done.

[Quoted text hidden]

--
Kevin Franck
617-682-9392

Ken Scudder <kenscudder@gmail.com>
To: Kevin Franck <kevin.c.franck@gmail.com>

Thu, Jul 9, 2015 at 9:53 AM

k

[Quoted text hidden]

Ken Scudder <kenscudder@gmail.com>
To: gabriel.piscione@huffingtonpost.com
Cc: basel.hamdan@huffingtonpost.com, Kevin Franck <kevin.c.franck@gmail.com>, samara.mackereth@huffingtonpost.com

Thu, Jul 9, 2015 at 9:55 AM

Hi Garbriel,

We should be able to run one in 5-10 minutes. He can do either Skype or Google Hangouts (Skype may be easier). How shall we set it up?

Ken

[Quoted text hidden]

--
Ken Scudder

Writer, Communications Trainer, Crisis Communication Consultant, Message Development Expert

Gabe Piscione <gabriel.piscione@huffingtonpost.com>

Thu, Jul 9, 2015 at 9:57 AM

To: Ken Scudder <kenscudder@gmail.com>

Cc: Basel Hamdan <basel.hamdan@huffingtonpost.com>, Kevin Franck <kevin.c.franck@gmail.com>, Samara Mackereth <samara.mackereth@huffingtonpost.com>

Hi Ken,

Sounds good. What is the Skype name you'll be using? I can send a request there and could you in 10 min if that works.

Thanks,

[Quoted text hidden]

Ken Scudder <kenscudder@gmail.com>

Thu, Jul 9, 2015 at 10:09 AM

To: Gabe Piscione <gabriel.piscione@huffingtonpost.com>

Cc: Basel Hamdan <basel.hamdan@huffingtonpost.com>, Kevin Franck <kevin.c.franck@gmail.com>, Samara Mackereth <samara.mackereth@huffingtonpost.com>

Sorry. Waiting for the Congressman to get off a call so I can get it from you.

[Quoted text hidden]

Gabe Piscione <gabriel.piscione@huffingtonpost.com>

Thu, Jul 9, 2015 at 10:10 AM

To: Ken Scudder <kenscudder@gmail.com>

Cc: Basel Hamdan <basel.hamdan@huffingtonpost.com>, Kevin Franck <kevin.c.franck@gmail.com>, Samara Mackereth <samara.mackereth@huffingtonpost.com>

Ok, no worries. Let me know as soon as you do. Thanks!

[Quoted text hidden]

Ken Scudder <kenscudder@gmail.com>

Thu, Jul 9, 2015 at 10:28 AM

To: Gabe Piscione <gabriel.piscione@huffingtonpost.com>

Cc: Basel Hamdan <basel.hamdan@huffingtonpost.com>, Kevin Franck <kevin.c.franck@gmail.com>, Samara Mackereth <samara.mackereth@huffingtonpost.com>

Repgrayson is the name

[Quoted text hidden]

Gabe Piscione <gabriel.piscione@huffingtonpost.com>

Thu, Jul 9, 2015 at 10:30 AM

To: Ken Scudder <kenscudder@gmail.com>

Cc: Basel Hamdan <basel.hamdan@huffingtonpost.com>, Kevin Franck <kevin.c.franck@gmail.com>, Samara Mackereth <samara.mackereth@huffingtonpost.com>

Just sent a request. Once you add me, we'll be able to test. Thanks!

[Quoted text hidden]

RESPONSE

EXHIBIT 15



Business Platinum Card®

COMMITTEE TO ELECT A

ALAN M GRAYSON

Closing Date 01/23/15 Next Closing Date 02/20/15

OPEN SM

Account Ending 8-82008

New Balance	\$36,248.80
Please Pay By	02/07/15 ‡

‡ Payment is due upon receipt. We suggest you pay by the Please Pay By date.

Membership Rewards® Points
 Available and Pending as of 12/31/14
1,120,130
 For up to date point balance and full program details, visit membershprewards.com

Account Summary

Previous Balance	\$36,759.31
Payments/Credits	-\$36,759.31
New Charges	+\$36,248.80
Fees	+\$0.00
New Balance	\$36,248.80

Days in Billing Period: 31

See page 2 for important information about your account.

Notice of Changes to the Membership Rewards® Program

Delta: We recently informed you of an annual limit on the number of Membership Rewards points that you can transfer into the SkyMiles® Program. This change is **canceled** . There is no annual limit to the number of points you can transfer to the SkyMiles Program. Remember, you may only transfer a maximum of 999,000 points to a single SkyMiles account per day.

Frontier: Effective March 5, 2015, Frontier Airlines will no longer be a point transfer airline in the Membership Rewards program. Any Membership Rewards point transfers for Frontier Airlines must be made by March 4, 2015. These transfers will be considered final, non-refundable, and subject to the EarlyReturns® program terms and conditions. To transfer points to Frontier, please visit membershprewards.com/travel.

Customer Care

Pay by Computer
open.com/pbc

Customer Care 1-800-492-8468	Pay by Phone 1-800-472-9297
--	---------------------------------------

See page 2 for additional information.

001809 1/4

6

Please note, your preset line is \$35,600.00. You have spent \$36,248.80.

PAID \$28,000.00 - 2/9/15 - ONLINE
PAID \$8248.80 - 2/10/15 CONF # W3792

Please fold on the perforation below, detach and return with your payment

(1

ROSSWR1 02315

000001024

(000

Payment Coupon
Do not staple or use paper clips

Pay by Computer
open.com/pbc

Pay by Phone
1-800-472-9297

Account Ending 8-82008

Enter account number on all documents. Make check payable to American Express.

AB 01 001809 28276 B 12 C



ALAN M GRAYSON
COMMITTEE TO ELECT A
4415 GWYNDALE CT
ORLANDO FL 32837-5509

Please Pay By
02/07/15
 Amount Due
\$36,248.80

Check here if your address or phone number has changed. Note changes on reverse side.

AMERICAN EXPRESS
P.O. BOX 650448
DALLAS TX 75265-0448

Detail Continued

01/09/15	FRONTIER AIRLINES, IFAREFAMILIES OK FRONTIER AIRLINES, INC From: N/A To: N/A Carrier: YY Class: 00 N/A N/A YY 00 N/A N/A YY 00 N/A N/A YY 00 Ticket Number: 42206181964995 Date of Departure: 01/09 Passenger Name: KEITH/DAVID Document Type: ADDITIONAL COLLECTION	
01/10/15	YAHOO *GRAYSONFORCO408-916-2149 CA SERVICE	\$40.94
01/10/15	GOGOAIR.COM 877-350-0038 IL INTERNET ACC	\$39.95
01/12/15	AMAZON MKTPLACE PMTSAMZN.COM/BILL WA BOOK STORES	\$699.00
01/12/15	Printmeisters of OrOrlando FL 8774174551	\$6,600.42
01/12/15	Printmeisters of OrOrlando FL 8774174551	\$4,580.06
01/12/15	QUAD CITIES RIVER BADAVENTPORT IA 563-3243000	\$7,262.97
01/12/15	NATIONAL DEMOCRATIC 202-5432035 DC 2025432035	\$10.00
01/12/15	QUAD CITIES RIVER BADAVENTPORT IA 563-3243000	\$7,262.97
01/12/15	QUAD CITIES RIVER BADAVENTPORT IA 563-3243000	\$7,262.97
01/14/15	AMAZON MKTPLACE PMTSAMZN.COM/BILL WA BOOK STORES	\$10.15
01/14/15	AMAZON MKTPLACE PMTSAMZN.COM/BILL WA BOOK STORES	\$11.96
01/16/15	DATA DOWNLOAD 3103837994 NC PROFESSIONAL SERVICE Description PROFESSIONAL SERVIC	\$14.98
01/16/15	DATA DOWNLOAD 3103837994 NC PROFESSIONAL SERVICE Description PROFESSIONAL SERVIC	\$14.98
01/16/15	DATA DOWNLOAD 3103837994 NC PROFESSIONAL SERVICE Description PROFESSIONAL SERVIC	\$14.98
01/16/15	DATA DOWNLOAD 3103837994 NC PROFESSIONAL SERVICE Description PROFESSIONAL SERVIC	\$14.98
01/16/15	DATA DOWNLOAD 3103837994 NC PROFESSIONAL SERVICE Description PROFESSIONAL SERVIC	\$14.98

AMAZON



DL Reserve Amex.

-----Original Message-----

From: custserv [mailto:custserv@directlenovo.com]
Sent: Wednesday, February 16, 2011 8:17 PM
To: grayson@graysonlaw.net
Subject: LENOVO Order 2H2MNC

Dear ALAN GRAYSON:

Thank you for your purchase from Lenovo. Your order has been received and is being processed. Please visit our online order status tool to view the latest information on the status of your order:
<https://www.directlenovo.com/orderstatus/login.cfm?cid=4742913&oid=2H2MNC>

IMPORTANT INFORMATION - LENOVO ONLINE DATA BACKUP SERVICE: If you purchased the Lenovo Online Data Back-up service, please refer to www.lenovo.com/protectmydata to redeem your service.

We have included your complete order information below. If you have any questions about your order please call Lenovo Sales toll free at (866)428-4465

or e-mail websales@lenovo.com. Please include your Customer Number and Order Number in any communications to help us serve you more quickly.

Thank you for purchasing from Lenovo. We appreciate your business.

Lenovo Sales
<http://www.lenovo.com>

NOTE: Please do not reply to this message; it comes from a notification-only address that cannot accept replies.

=====
=====

Order Information
Order date and time: 2H2MNC 02/16/11 18:17:03 Customer Number: 4742913
4742913

Order Number: 2H2MNC

Ship-To:
ALAN GRAYSON
8419 OAK PARK RD

ORLANDO, FL 32819

Bill-To (if different from Ship-To):
ALAN GRAYSON

Committee_0000055

8419 OAK PARK ROAD

ORLANDO, FL 32819

=====
=====

Product	Description	Price	Qty	Total
SYS.08772D	CONFIGURED SYSTEM	649.00	1	649.00
	Shipping & Handling:	0.00		
	Tax:	42.19		
	Total:	691.19		

Payment method: AMAZON

Some orders are shipped from multiple locations. If shipping charges are applicable, you will only be billed for a single shipping charge.

=====
=====

IMPORTANT LEGAL INFORMATION

*This e-mail confirms Lenovo's receipt of your order. LENOVO will accept your order contingent on Lenovo's validation of price, product availability and your agreement to the terms and conditions for the product(s) and/or service(s) ordered. Applicable terms and conditions are typically accepted by the customer during the web ordering process. For Lenovo products, typically the terms and conditions are set forth in The Lenovo Acquisition Agreement. If the terms and conditions were not displayed and agreed to as part of that process, a copy will be provided with your order. The Lenovo Acquisition Agreement terms and conditions are available by visiting www.lenovo.com/products/us/contracts or calling 1-866-96-THINK (1-866-968-4465) and selecting the Customer Service option. Please review them carefully before using the product. If you already have a contract with Lenovo (such as the Lenovo Customer Agreement or Lenovo Business Partner Agreement), that agreement governs your purchases.

If you do not agree to the terms and conditions and wish to return your purchase, do not use the product. Visit <http://www.lenovo.com/products/us/returns> for instructions. Your order may be subject to a 15% restocking fee.

****LIMITED SUPPLY PRODUCTS:** Limited supply products cannot be reordered once they sell out. If we take your order on a product which sells out and the product can not be reordered, (1) Lenovo has the right to refuse or cancel any orders placed for the product, even if Lenovo has confirmed the order and charged your credit card; and (2) if Lenovo has charged your credit card but subsequently canceled your order, Lenovo will promptly issue a credit to your credit card account.

RESPONSE

EXHIBIT 16

FEC FORM 3

REPORT OF RECEIPTS AND DISBURSEMENTS For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT Example: If typing, type over the lines. 12FE4M5 Committee to Elect Alan Grayson

ADDRESS (number and street) PO Box 533616 Orlando FL 32853-3616 Check if different than previously reported. (ACC)

2. FEC IDENTIFICATION NUMBER C00424713 3. IS THIS REPORT NEW OR AMENDED CITY STATE ZIP CODE STATE DISTRICT

4. TYPE OF REPORT (Choose One) (a) Quarterly Reports: April 15 Quarterly Report (Q1) July 15 Quarterly Report (Q2) October 15 Quarterly Report (Q3) January 31 Year-End Report (YE) Termination Report (TER)

(b) 12-Day PRE-Election Report for the: Primary (12P) General (12G) Runoff (12R) Convention (12C) Special (12S) Election on in the State of (c) 30-Day POST-Election Report for the: General (30G) Runoff (30R) Special (30S) Election on in the State of

5. Covering Period 01 01 2015 through 03 31 2015

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Carla Coleman

Signature of Treasurer Carla Coleman [Electronically Filed] Date 04 15 2015

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office Use Only table with 8 columns and 1 row. Includes FEC FORM 3 (Revised 02/2003) label.

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 354 OF 433
	<input checked="" type="checkbox"/> 17 20a <input type="checkbox"/> 18 20b <input type="checkbox"/> 19a 20c <input type="checkbox"/> 19b 21	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Committee to Elect Alan Grayson

Full Name (Last, First, Middle Initial) A. American Express		Date of Disbursement
Mailing Address PO Box 360002		MM / DD / YYYY 02 / 11 / 2015
City Ft Lauderdale	State FL	Zip Code 33336-0002
Purpose of Disbursement CREDIT CARD PAYMENT: SEE BELOW		Amount of Each Disbursement this Period 36248.8
Candidate Name	Category/Type 001	Transaction ID : B-E-415811
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Original vendors exceeding reporting threshold itemized as memo transactions.
State: District:		

Full Name (Last, First, Middle Initial) B. Yahoo		Date of Disbursement
Mailing Address 701 First Avenue		MM / DD / YYYY 02 / 11 / 2015
City Sunnyvale	State CA	Zip Code 94089-1019
Purpose of Disbursement Advertising		Amount of Each Disbursement this Period 40.94
Candidate Name	Category/Type 004	Transaction ID : B-S-4261
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	[MEMO ITEM] Subitemization of American Express(02/11/15)
State: District:		

Full Name (Last, First, Middle Initial) C. Amtrak		Date of Disbursement
Mailing Address 50 Massachusetts Avenue NE		MM / DD / YYYY 02 / 11 / 2015
City Washington	State DC	Zip Code 20002-4214
Purpose of Disbursement Train Transportation		Amount of Each Disbursement this Period 96.18
Candidate Name	Category/Type 002	Transaction ID : B-S-4269
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	[MEMO ITEM] Subitemization of American Express(02/11/15)
State: District:		

SUBTOTAL of Disbursements This Page (optional).....	36248.80
TOTAL This Period (last page this line number only).....	

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)				PAGE 355 OF 433
	<input checked="" type="checkbox"/> 17 20a	<input type="checkbox"/> 18 20b	<input type="checkbox"/> 19a 20c	<input type="checkbox"/> 19b 21	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Committee to Elect Alan Grayson

Full Name (Last, First, Middle Initial) A. US Airways		Date of Disbursement MM / DD / YYYY 02 / 11 / 2015
Mailing Address 4000 E Sky Harbor Boulevard		Amount of Each Disbursement this Period \$ 596.2
City Phoenix	State AZ	Zip Code 85034-3802
Purpose of Disbursement Airfare	Category/Type 002	Transaction ID : B-S-4268
Candidate Name	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)
State:	District:	[MEMO ITEM] Subitemization of American Express(02/11/15)

Full Name (Last, First, Middle Initial) B. Printmeisters		Date of Disbursement MM / DD / YYYY 02 / 11 / 2015
Mailing Address 10732 William Tell Drive		Amount of Each Disbursement this Period \$ 11901.59
City Orlando	State FL	Zip Code 32821-8764
Purpose of Disbursement Printing	Category/Type 001	Transaction ID : B-S-4264
Candidate Name	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)
State:	District:	[MEMO ITEM] Subitemization of American Express(02/11/15)

Full Name (Last, First, Middle Initial) C. Quad Cities Bandits		Date of Disbursement MM / DD / YYYY 02 / 11 / 2015
Mailing Address 209 S Gaines Street		Amount of Each Disbursement this Period \$ 21798.91
City Davenport	State IA	Zip Code 52802-1403
Purpose of Disbursement Advertising	Category/Type 004	Transaction ID : B-S-4265
Candidate Name	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)
State:	District:	[MEMO ITEM] Subitemization of American Express(02/11/15)

SUBTOTAL of Disbursements This Page (optional)	\$ 0.00
TOTAL This Period (last page this line number only)	

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)				PAGE 356 OF 433	
	<input checked="" type="checkbox"/> 17 20a	<input type="checkbox"/> 18 20b	<input type="checkbox"/> 19a 20c	<input type="checkbox"/> 19b 21		

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Committee to Elect Alan Grayson

Full Name (Last, First, Middle Initial) A. Boost Mobile		Date of Disbursement
Mailing Address 2157 Americana Boulevard		MM / DD / YYYY 02 / 11 / 2015
City Orlando	State FL	Zip Code 32839-2174
Purpose of Disbursement Telephone	001	Amount of Each Disbursement this Period 95.89
Candidate Name	Category/Type	Transaction ID : B-S-4270
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	[MEMO ITEM] Subitemization of American Express(02/11/15)
State: District:		

Full Name (Last, First, Middle Initial) B. Pierry Interactive		Date of Disbursement
Mailing Address 1791 Broadway Street Suite 203		MM / DD / YYYY 02 / 11 / 2015
City Redwood City	State CA	Zip Code 94063-2487
Purpose of Disbursement Online Advertising	004	Amount of Each Disbursement this Period 569.04
Candidate Name	Category/Type	Transaction ID : B-S-4259
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	[MEMO ITEM] Subitemization of American Express(02/11/15)
State: District:		

Full Name (Last, First, Middle Initial) C. Amazon.com		Date of Disbursement
Mailing Address 1516 2nd Avenue		MM / DD / YYYY 02 / 11 / 2015
City Seattle	State WA	Zip Code 98101-1543
Purpose of Disbursement Computer Equipment	001	Amount of Each Disbursement this Period 721.11
Candidate Name	Category/Type	Transaction ID : B-S-4263
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	[MEMO ITEM] Subitemization of American Express(02/11/15)
State: District:		

SUBTOTAL of Disbursements This Page (optional).....	0.00
TOTAL This Period (last page this line number only).....	

RESPONSE

EXHIBIT 17

----- Forwarded message -----

From: Christina Jensen <Christina.Jensen@foxtv.com>

Date: Fri, Jul 10, 2015 at 11:36 AM

Subject: Grayson Announcement

To: "kevin.c.franck@gmail.com" <kevin.c.franck@gmail.com>

Hi Kevin,

We wanted to check in on a couple things. Yesterday, it looked like Grayson did his announcement for HuffPost live from his House office. What is his explanation for that?

Also, there's a story in the Free Beacon about a staffer also working for his hedge fund. Why should voters trust this isn't a conflict of interest or resources?

Thank you,

Tina Jensen

--
Kevin Franck
[617-682-9392](tel:617-682-9392)

--
Kevin Franck
[617-682-9392](tel:617-682-9392)

--
Ken Scudder
Writer, Communications Trainer, Crisis Communication Consultant, Message Development Expert

RESPONSE

EXHIBIT 18



Ken Scudder <kenscudder@gmail.com>

Fwd: Grayson Announcement

17 messages

Kevin Franck <kevin.c.franck@gmail.com>
To: Ken Scudder <kenscudder@gmail.com>

Fri, Jul 10, 2015 at 11:46 AM

Did you get this one too? I want to slow walk this since it will be Friday afternoon soon.

----- Forwarded message -----

From: **Christina Jensen** <Christina.Jensen@foxtv.com>
Date: Fri, Jul 10, 2015 at 11:36 AM
Subject: Grayson Announcement
To: "kevin.c.franck@gmail.com" <kevin.c.franck@gmail.com>

Hi Kevin,

We wanted to check in on a couple things. Yesterday, it looked like Grayson did his announcement for HuffPost live from his House office. What is his explanation for that?

Also, there's a story in the Free Beacon about a staffer also working for his hedge fund. Why should voters trust this isn't a conflict of interest or resources?

Thank you,

Tina Jensen

--
Kevin Franck
617-682-9392

Ken Scudder <kenscudder@gmail.com>
To: Kevin Franck <kevin.c.franck@gmail.com>

Fri, Jul 10, 2015 at 11:49 AM

Was just going to email you about it. Yeah. Spoke briefly with her. She's working on it for 5p story.

2nd one we can use same response we sent to Free Beacon.

For 1st one she asked if ethics violation. I'm 90% sure it's not.

RESPONSE

EXHIBIT 19

Doug Dodson

From: Kevin Franck <kevin.c.franck@gmail.com>
Sent: Friday, July 10, 2015 4:27 PM
To: Doug Dodson
Subject: Fwd: Grayson Announcement

FYI -

----- Forwarded message -----

From: Ken Scudder <kenscudder@gmail.com>
Date: Fri, Jul 10, 2015 at 4:21 PM
Subject: Re: Grayson Announcement
To: Kevin Franck <kevin.c.franck@gmail.com>

I disagree with you in every aspect here. I am thinking more than 3 moves ahead here as we attempt to clean up a major fuck-up from yesterday.

Of course Murphy's people pushed it. But better to have a story that owns and moves on than one that ducks and looks more guilty. If you don't answer the inference is "they knew they were breaking the rules and went ahead." What we're going for here is "it's a mistake that won't be repeated." The second is obviously much preferable. The rest of the interviews were on his personal phone, right? You didn't let him use the switchboard phone.

The flags behind him and the fact he was in DC that day pretty much confirm he was in his office. Did you look at the video?

Your suggestion left us dealing with this for a lot longer. Julie, Bagby, and the Congressman all agreed on this course of action. There was a fuck up, this is the best way to deal with it. I've been doing crisis communications for over 20 years - I can show you hundreds of examples of how this is how you handle it.

It's done.

On Fri, Jul 10, 2015 at 4:14 PM, Kevin Franck <kevin.c.franck@gmail.com> wrote:
I just have to reiterate to you that that is a terrible idea. Please just think two or three moves ahead.

This reporter didn't come to this suspicion on her own. Murphy's people pushed it. They'll notice a story that runs saying we admitted to breaking the law. Then they'll circulate to every reporter covering this race - 10 of whom interviewed AMG yesterday via the Capitol switch board with me sitting in the room.

They probably can't even confirm that it's his office in the shot unless we confirm it for them. Did you look back at the video to see if there's anything besides the flags visible. Or, did he say he was in his office?

There are other ways to handle this that leave us less exposed.

On Fri, Jul 10, 2015 at 4:02 PM, Ken Scudder <kenscudder@gmail.com> wrote:
Got no choice - rules are pretty clear on it. Should not have happened. Admit it, take the hit now, and don't fight it for 15 months.

On Fri, Jul 10, 2015 at 4:00 PM, Kevin Franck <kevin.c.franck@gmail.com> wrote:
It sounds like you're going to admit we broke the rules, but promise not to do it again.

On Fri, Jul 10, 2015 at 3:48 PM, Ken Scudder <kenscudder@gmail.com> wrote:
Wow what?

On Fri, Jul 10, 2015 at 3:47 PM, Kevin <kevin.c.franck@gmail.com> wrote:
Wow

Sent from my iPhone

On Jul 10, 2015, at 3:15 PM, Ken Scudder <kenscudder@gmail.com> wrote:

FYI, about 3:45 I'm sending her statement that says that interview done in his office because of busy schedule including last-second votes, used campaign computer, it won't happen again. And then same answers on Carla at hedge fund.

On Fri, Jul 10, 2015 at 12:10 PM, Kevin <kevin.c.franck@gmail.com> wrote:
Ok. I disagree with that strategy, but you can handle it on the official side.

Sent from my iPhone

On Jul 10, 2015, at 11:52 AM, Ken Scudder <kenscudder@gmail.com> wrote:

Yes she will. She'll have allegations against him and a line about "Grayson's office and campaign refused to comment on these latest allegations." Which makes him look like he's ducking because he's guilty.

On Fri, Jul 10, 2015 at 11:50 AM, Kevin Franck <kevin.c.franck@gmail.com> wrote:
Can we just not respond? She won't have anything to report if we don't.

On Fri, Jul 10, 2015 at 11:49 AM, Ken Scudder <kenscudder@gmail.com> wrote:

Was just going to email you about it. Yeah. Spoke briefly with her. She's working on it for 5p story.

2nd one we can use same response we sent to Free Beacon.

For 1st one she asked if ethics violation. I'm 90% sure it's not.

On Fri, Jul 10, 2015, 11:46 AM Kevin Franck <kevin.c.franck@gmail.com> wrote:
Did you get this one too? I want to slow walk this since it will be Friday afternoon soon.

RESPONSE

EXHIBIT 20

[Quoted text hidden]

Kevin Franck <kevin.c.franck@gmail.com>
To: Ken Scudder <kenscudder@gmail.com>

Fri, Jul 10, 2015 at 11:50 AM

Can we just not respond? She won't have anything to report if we don't.

[Quoted text hidden]

--

Kevin Franck
617-682-9392

Ken Scudder <kenscudder@gmail.com>
To: Kevin Franck <kevin.c.franck@gmail.com>

Fri, Jul 10, 2015 at 11:52 AM

Yes she will. She'll have allegations against him and a line about "Grayson's office and campaign refused to comment on these latest allegations." Which makes him look like he's ducking because he's guilty.

[Quoted text hidden]

--

Ken Scudder
Writer, Communications Trainer, Crisis Communication Consultant, Message Development Expert

Kevin <kevin.c.franck@gmail.com>
To: Ken Scudder <kenscudder@gmail.com>

Fri, Jul 10, 2015 at 12:10 PM

Ok. I disagree with that strategy, but you can handle it on the official side.

Sent from my iPhone

[Quoted text hidden]

Ken Scudder <kenscudder@gmail.com>
To: Kevin <kevin.c.franck@gmail.com>

Fri, Jul 10, 2015 at 3:15 PM

FYI, about 3:45 I'm sending her statement that says that interview done in his office because of busy schedule including last-second votes, used campaign computer, it won't happen again. And then same answers on Carla at hedge fund.

[Quoted text hidden]

Kevin <kevin.c.franck@gmail.com>
To: Ken Scudder <kenscudder@gmail.com>

Fri, Jul 10, 2015 at 3:47 PM

Wow

Sent from my iPhone

[Quoted text hidden]

Ken Scudder <kenscudder@gmail.com>
To: Kevin <kevin.c.franck@gmail.com>

Fri, Jul 10, 2015 at 3:48 PM

Wow what?

[Quoted text hidden]

Kevin Franck <kevin.c.franck@gmail.com>
To: Ken Scudder <kenscudder@gmail.com>

Fri, Jul 10, 2015 at 4:00 PM

It sounds like you're going to admit we broke the rules, but promise not to do it again.

[Quoted text hidden]

--

Kevin Franck
617-682-9392

Ken Scudder <kenscudder@gmail.com>
To: Kevin Franck <kevin.c.franck@gmail.com>

Fri, Jul 10, 2015 at 4:02 PM

Got no choice - rules are pretty clear on it. Should not have happened. Admit it, take the hit now, and don't fight it for 15 months.

[Quoted text hidden]

Kevin Franck <kevin.c.franck@gmail.com>
To: Ken Scudder <kenscudder@gmail.com>

Fri, Jul 10, 2015 at 4:14 PM

I just have to reiterate to you that that is a terrible idea. Please just think two or three moves ahead.

This reporter didn't come to this suspicion on her own. Murphy's people pushed it. They'll notice a story that runs saying we admitted to breaking the law. Then they'll circulate to every reporter covering this race - 10 of whom interviewed AMG yesterday via the Capitol switch board with me sitting in the room.

They probably can't even confirm that it's his office in the shot unless we confirm it for them. Did you look back at the video to see if there's anything besides the flags visible. Or, did he say he was in his office?

There are other ways to handle this that leave us less exposed.

[Quoted text hidden]

--

Kevin Franck
617-682-9392

Doug Dodson <dougdodsontx@gmail.com>
To: Kevin Franck <kevin.c.franck@gmail.com>, Ken Scudder <kenscudder@gmail.com>

Fri, Jul 10, 2015 at 4:19 PM

I am just getting these emails damn service.

I agree it's a bad idea we need to come up with a way and not lie