

EMPOWER OVERSIGHT

Whistleblowers & Research



October 8, 2021

VIA ELECTRONIC TRANSMISSION

The Honorable Christopher Coons, Chairman
The Honorable James Lankford, Vice Chairman
Senate Select Committee on Ethics
220 Hart Senate Office Building
Washington, DC 20510

RE: Complaint and Request for Investigation into Whether Members and Staff of the U.S. Senate Armed Services Committee Solicited and Accepted Gifts of Professional Services in Violation of Senate Ethics Rule XXXV and Related Matters

Dear Chairman Coons and Vice Chairman Lankford:

Empower Oversight Whistleblower & Research (“Empower Oversight”) files this Complaint and Investigation Request with respect to whether staff and members of the U.S. Senate Armed Services Committee (“Committee”), including T. Kirk McConnell, violated, at a minimum, Senate Rule XXXV (“Gift Rule”) by requesting and accepting professional services from The Democracy Integrity Project (“TDIP”) and Daniel J. Jones.

TDIP, a nonprofit, and Penn Quarter Group, a for-profit firm run by Jones, are reportedly funded by a small group of billionaires. TDIP and Jones provided detailed technical expert services to the Committee for free, as revealed by TDIP itself in a September 14, 2021, court filing. According to that filing, TDIP’s research for the Committee began in 2017, continued for more than a year, involved hiring “computer science” experts at no cost to the Committee, and was aimed at evaluating data that the Committee had received for alleged connections between Alfa Bank and Trump Organization servers.

Special Counsel John Durham announced on September 16, 2021 that a grand jury has indicted an attorney for the Hillary Clinton campaign for allegedly lying to the Federal Bureau of Investigations (FBI) in connection with these claims, which have also been debunked by Special Counsel Robert Mueller and the FBI in their independent investigations. It is unclear whether the data described in Special Counsel Durham’s indictment is the same data obtained by the Committee and analyzed for the Committee by TDIP.¹

¹ Press Release, *Grand Jury Indicts D.C. Attorney with Making False Statements to the FBI in 2016 Regarding Alleged Communications Between Trump Organization and Russian Bank*, U.S. Dep’t of Justice (Sept. 16, 2021),

In light of these facts, it is important for the Senate and the public to have a more complete understanding of whether the Committee’s activities constituted “improper conduct which may reflect upon the Senate”² or violated any Senate rules.³

For the reasons below, the Senate Select Committee on Ethics should initiate a preliminary inquiry to determine whether there is substantial credible evidence which provides substantial cause to conclude that an applicable violation of Senate Rules has occurred,⁴ and if so, proceed to adjudicatory review.⁵ In the alternative, if the Committee concludes that even if true, the facts described below do not constitute a violation of Senate Rules, then it should issue clarifying guidance to that effect so that other Committees can benefit from soliciting free outside professional services to supplement their congressional oversight work without fear of violating the Rules.

Relevant Actors:

The Requester, Empower Oversight, is a nonprofit, nonpartisan educational organization dedicated to enhancing independent oversight of government and corporate wrongdoing,⁶ Among other things, Empower Oversight educates Members of Congress, inspectors general, and other official institutions charged with strengthening public integrity, and advocates for more effective oversight and whistleblower-driven investigations.⁷ Its leadership has decades of experience conducting congressional investigations, exposing major scandals.⁸

The organization in question, TDIP, is a District of Columbia nonprofit corporation that describes its mission as conducting research and investigations, and helping to mitigate foreign interference in elections in the United States and its allies overseas.⁹ Daniel J. Jones, the President and CEO of TDIP, is a former FBI analyst and former staffer for the U.S. Senate Select Committee on Intelligence and Ranking Member Dianne Feinstein (D-CA).¹⁰

Context and Background

Media reports alleging connections between Alfa Bank and the Trump Organization servers in 2016 began just days before the 2016 election, in a series of two articles published in Slate Magazine, which reported that intelligence officials possessed information indicating a

available at <https://www.justice.gov/sco/pr/grand-jury-indicts-dc-attorney-making-false-statements-fbi-2016-regarding-alleged>.

² *Senate Ethics Manual*, Select Committee on Ethics, U.S. Senate at 4 (2003 ed.), available at https://www.ethics.senate.gov/public/_cache/files/f2eb14e3-1123-48eb-9334-8c4717102a6e/2003-senate-ethics-manual.pdf.]

³ Senate Rule XXXV, the Gift Rule, appears to be particularly applicable here, although additional facts uncovered in the course of an investigation may also, or in the alternative, reveal violations of other Senate Rules.

⁴ See Rule 3(a)-(c), Rules of Procedure: Select Committee on Ethics, Sen. Committee on Ethics (rev. 2015), available at https://www.ethics.senate.gov/public/_cache/files/551b39fc-30ed-4b14-b0d3-1706608a6fcb/2015---blue-book---rulesofprocedure.pdf.

⁵ See *id.*, Rule 4(a)-(b).

⁶ *Mission*, Empower Oversight Whistleblower & Research (last accessed Oct. 5, 2021), available at <https://empowr.us/mission/>.

⁷ *Id.*

⁸ *Id.*

⁹ See Compl., ¶ 6, *infra* n. 19.

¹⁰ *Id.* ¶ 3.

back channel between the two entities.¹¹ According to Special Counsel Durham’s September 16, 2021 indictment of Democratic lawyer Michael Sussman of Perkins Coie LLP, the FBI initiated an investigation of these materials in response to a September 19, 2016 meeting the FBI held with Sussman, in which Sussman withheld from the FBI that he was conducting work for the 2016 Clinton campaign when he presented to the FBI documents and data showing alleged links between Alfa Bank and the Trump Organization.¹² Also in 2016, Mark Elias, also of Perkins Coie, retained Fusion GPS to assist in its representation of the Clinton campaign and the Democratic National Committee through performing “a variety of research services during the 2016 election cycle.”¹³ Fusion GPS, among other things, commissioned the now infamous “Steele Dossier,” a series of memos authored by former MI-6 agent Christopher Steele regarding alleged “Russian collusion” and former President Trump.

In March 2017, Jones told the FBI that his for-profit firm, Penn Quarter Group, “was being funded by 7 to 10 wealthy donors located primarily in New York and California, who provided approximately \$50 million.”¹⁴ Jones reportedly founded TDIP around the same time in part to continue the work begun by Fusion GPS that had culminated in the Steele Dossier.¹⁵ However, TDIP reported only \$7 million in revenue, primarily from contributions.¹⁶ Because Penn Quarter Group is a for-profit firm with no disclosure obligations, it is unclear how the \$50 million that Jones described to FBI was used. TDIP reportedly received a “sizable check” in 2017 from billionaire donor George Soros to continue its “investigation and research into foreign interference in American elections and European elections.”¹⁷

Years later, TDIP continued to maintain significant ties with Fusion GPS and Christopher Steele. TDIP tax records filed in November 2020 reveal that TDIP paid \$1,222,714 in 2019 to

¹¹ See Compl. ¶¶9-11; see also Franklin Foer, *Trump’s Server, Revisited*, SLATE (Nov. 2, 2016), available at <https://slate.com/news-and-politics/2016/11/the-trump-server-evaluating-new-evidence-and-countertheories.html>. Franklin Foer, *Was a Trump Server Communicating with Russia?*, SLATE (Oct. 31, 2016), available at http://www.slate.com/articles/news_and_politics/cover_story/2016/10/was_a_server_registered_to_the_trump_organization_communicating_with_russia.html.

¹² See, e.g., Sarah N. Lynch, *Attorney who advised Clinton campaign indicted in U.S. Trump-Russia Probe*, Reuters (Sept. 16, 2021), available at <https://www.reuters.com/world/us/us-grand-jury-indicts-lawyer-who-represented-clinton-campaign-2021-09-16/>.

¹³ See Debra Cassens Weiss, *Perkins Coie hired company that compiled Trump dossier*, ABA Journal (Oct. 25, 2017), available at https://www.abajournal.com/news/article/perkins_coie_hired_company_that_compiled_trump_dossier_on_behalf_of_clinton (linking to letter from Perkins Coie managing partner Matthew Gehringer to Fusion GPS describing scope of retention).

¹⁴ H.R. Rep. No. 115-1110, at 124 (2018), available at <https://www.congress.gov/115/crpt/hrpt1110/CRPT-115hrpt1110.pdf>; see Compl. ¶ 39 (“The PQG is a for-profit consulting, research, and global investigations services firm that is led by Mr. Jones.”).

¹⁵ John Solomon & Lee Smith, *Effort to spread discredited Russia collusion theory welcomed by McCain Senate panel, memos show*, Just the News, (Sept. 24, 2021), available at <https://justthenews.com/accountability/russia-and-ukraine-scandals/effort-spread-discredited-russia-collusion-theory>.

¹⁶ *Democracy Integrity Project*, ProPublica (last accessed Oct. 6, 2021), available at <https://projects.propublica.org/nonprofits/organizations/815223488>.

¹⁷ See *id.*; see also Kenneth P. Vogel, Scott Shane & Patrick Kingsley, *How Vilification of George Soros Moved From the Fringes to the Mainstream*, N.Y.T. (Oct. 31, 2018), available at <https://www.nytimes.com/2018/10/31/us/politics/george-soros-bombs-trump.html> (Mr. Soros’s representatives say he gave \$1 million to . . . the Democracy Integrity Project, which was established after the 2016 election to investigate foreign interference in elections and to research Mr. Trump’s connections to Russian interests.”).

Bean, LLC, the legal entity operating as Fusion GPS, and \$700,000 to Walsingham Partners, an entity reportedly co-owned by Christopher Steele and his business partner.¹⁸

The September 2021 Court Filing

On September 14, 2021, TDIP and Jones filed a Complaint for Declaratory and Injunctive Relief and Damages (hereinafter “Complaint”) against Alfa Bank in the Superior Court for the District of Columbia.¹⁹ In the course of seeking a declaratory judgment and injunction prohibiting Alfa Bank from disclosing certain documents and testimony related to its work,²⁰ the Complaint indicates that TDIP and Jones retained experts on behalf of and for the benefit of the Committee. At no charge to the Committee, they conducted extensive technical analysis of data received by the Committee.

The Complaint includes the following allegations, specific to TDIP and Jones’ work for the Committee:

23. In early-to-mid 2017, the U.S. Senate Armed Services committee, **via senior leadership staff acting in their official capacity, asked Mr. Jones to research** and offer his insights into the alleged connections between Alfa Bank and Trump Organization servers.

24. More specifically, the Senate Armed Services Committee **requested that Mr. Jones evaluate information it had received** about DNS look-ups between Alfa Bank servers and Trump Organization servers.

* * *

27. After investigating and confirming the *bona fides* of the data source described by the Senate Armed Services Committee, information provided by the source’s representative, and the importance of a rigorous analysis of the alleged server links, **TDIP and Mr. Jones agreed to receive and analyze a dataset of DNS look-ups and to report their findings back to the U.S. Senate.**

28. TDIP and Mr. Jones **spent more than a year rigorously analyzing** the dataset and the available background information on Alfa Bank, the Trump Organization, and the other entities whose servers the DNS data suggested were connecting to the Trump Organization server at issue (i.e., Spectrum Health and Heartland Payment Systems). **In connection with this effort, TDIP retained computer science experts to examine the data**, questioned anonymous data scientists who had done prior research, and **compiled details** on Alfa Bank’s historical practices and business relationships.

¹⁸ Jerry Dunleavy, *Feinstein’s former staffer helped funnel millions to Steele and Fusion GPS after 2016*, Washington Examiner (May 11, 2021), available at <https://www.washingtonexaminer.com/news/feinsteins-former-staffer-helped-funnel-millions-to-steele-and-fusion-gps-after-2016> (linking to relevant tax filings).

¹⁹ Compl., *Democracy Integrity Project and Jones v. AO Alfa-Bank*, No. 2021 CA 2021 03225 (D.C. Sept. 14, 2021) (Attachment 1).

²⁰ *Id.* ¶ 1.

29. TDIP and Mr. Jones' analysis was **conducted confidentially** and pursuant to TDIP's public interest mission. **TDIP was not paid for its analysis.**

30. TDIP **drafted a detailed report** summarizing its analysis.²¹

In a recent news report, a source who has worked on the Committee for several years indicated that the Committee was "still searching for records to explain the exact nature of the relationship with Jones and TDIP."²² However, TDIP and Jones indicated that their work for the Committee should be treated as confidential or *commercial* information, characterizing it as essentially similar to work for a paying client:

61. The Jones Deposition transcript and **certain of the disputed confidential documents constitute**, reflect, or contain **confidential research or commercial information**. Specifically, these exhibits each reflect or contain **confidential research** that TDIP and Mr. Jones undertook **into DNS look-ups** that suggested a connection between the servers of powerful Russian entities with close ties to the Kremlin (not limited to Alfa Bank) and individuals and entities potentially associated with President Trump.²³

Regarding the alleged confidential nature of these documents, on June 11, 2020, Alfa Bank filed two cases against unnamed "John Doe" defendants, alleging that DNS look-ups described in the TDIP report were fabricated.²⁴

In connection with these cases, Alfa Bank issued subpoenas for documents and testimony to multiple entities and persons, including to Jones and TDIP.²⁵ On February 26, 2021, the parties executed a confidentiality agreement, pursuant to which TDIP and Jones produced confidential documents and provided deposition testimony to Alfa Bank.²⁶ Among other things, the Confidentiality Agreement specifies that confidential documents may be reviewed by "other persons only upon consent of the producing Party and on such conditions as are agreed to."²⁷

On July 27, 2021, the U.S. Senate Armed Services Committee and T. Kirk McConnell, a professional staff member of the committee, through the Office of Senate Legal Counsel, filed a motion to quash third party subpoenas issued to Mr. McConnell.²⁸ On August 20, 2021, Alfa Bank sent written notice to plaintiffs that it was challenging the plaintiffs' confidential designation as to the Jones deposition transcript and accompanying exhibits,²⁹ which contained or reflected TDIP's research regarding Alfa Bank and the Trump organization.³⁰ Alfa Bank

²¹ See Compl. ¶¶ 23-24, 27-30 (emphasis added). A "DNS look-up" is the process by which a Domain Name System (DNS) record is returned from a DNS server to translate an domain name into a numeric internet protocol (IP) address.

²² Solomon & Smith, *supra* n.15.

²³ See Compl. ¶¶ 61 (emphasis added).

²⁴ See Compl. ¶ 34 (citing *AO Alfa-Bank v. Doe*, Case No. 50-2020-CA-006304-XXX-MB (Fla. 15th Cir. Ct.); *AO Alfa-Bank v. Doe*, Case No. CI-20-04003 (Pa. C.P. Lancaster Cty.).

²⁵ See Compl. ¶¶ 35, 37.

²⁶ *Id.* ¶ 40.

²⁷ *Id.* ¶ 43 (internal citation omitted).

²⁸ See *id.* ¶ 58; see *infra* n. 32.

²⁹ *Id.* ¶ 52.

³⁰ *Id.* ¶ 61.

planned to file publicly confidential exhibits in connection with its opposition to the motion to quash subpoenas to T. Kirk McConnell.

According to TDIP and Jones, the documents constituting, reflecting, or containing the “confidential research” regarding Trump affiliates and Alfa Bank included “theories and hypothesis that were not proven” and was otherwise “not intended to be publicly disseminated.”³¹ TDIP argued that disclosure of such documents “could be used to spread misinformation or spawn conspiracy theories.”³²

On September 9, 2021, a filing in the *In re Superior Court* matter revealed that Alfa Bank withdrew its subpoenas issued to McConnell, and the Committee and McConnell withdrew their motion to quash accordingly.³³ Five days later, on September 14, TDIP and Jones filed the Complaint quoted extensively above describing the free research and analysis they provided to, and at the request of, the Committee.

The Gift Rule

Senate Rule XXXV (“Gift Rule”) provides, in relevant part, the following:

(1)(a)(1) No Member, officer, or employee of the Senate shall knowingly accept a gift except as provided in this rule.

(2)(A) A Member, officer, or employee may accept a gift (other than cash or cash equivalent) which the Member, officer, or employee reasonably and in good faith believes to have a value of less than \$50, and a cumulative value from one source during a calendar year of less than \$100. No gift with a value below \$10 shall count toward the ***\$100 annual limit***.

* * *

(b)(1) For the purpose of this rule, the term “gift” means any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or other item having monetary value. The term includes ***gifts of services***, training, transportation, lodging, and meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.

In other words, the Gift Rule generally prohibits in-kind donation of services, among other items of value that constitute a “gift,” exceeding \$100 annually.³⁴

There are certain exceptions to the Gift Rule. For example, members, officers, or employees may accept a gift of services with a value of less than \$50, provided that the source of the gift is not a registered lobbyist, foreign agent, or private entity that retains or employs a registered lobbyist or foreign agent. The value of gifts that may be accepted from any one source in a calendar may not exceed \$100.³⁵ In addition, gifts from certain sources, including gifts

³¹ *Id.* ¶¶ 61, 64.

³² *Id.* ¶ 65.

³³ See Notice of Withdrawal of Motion to Quash Subpoenas and Dismissal of this Miscellaneous Action at 1, No. 1:21-mc-00100-DLF (D.D.C. Sept. 9, 2021) (Attachment 2).

³⁴ See Senate Rule 35.1(a)(2)(A).

³⁵ *See id.*; see also *Gifts*, U.S. Senate Select Committee on Ethics (last accessed Oct. 5, 2021), available at <https://www.ethics.senate.gov/public/index.cfm/gifts>.

made by relatives,³⁶ gifts given on the basis of personal friendship,³⁷ or gifts from current colleagues³⁸ are frequently exempt from the Gift Rule.

Analysis:

Taking the allegations in the Complaint as true, TDIP and Jones spent “more than a year rigorously analyzing” data and background information on Alfa Bank, including having “retained” computer data scientists and “drafted a detailed report,” which was 687 pages long.³⁹ Nevertheless, TDIP “was not paid for its analysis.”⁴⁰ Moreover, rather than bringing information *to* the Committee, TDIP appears to have obtained the nonpublic data used for its analysis *from* the Committee itself, for the purpose of providing the solicited expert services to the Committee.⁴¹

As the Gift Rule explains, a “gift” may constitute more than a tangible item, but rather also applies to—and generally prohibits—“in-kind donation of services” among “other items of value,” including “services” that exceed \$100 annually. The fair market value of this research would clearly exceed \$100, the threshold maximum for a Gift Rule exception. The research was developed for over a year and culminated in a major 687-page report, likely prepared at considerable expense to TDIP. Jones appears to value his own services very highly. For example, tax filings for fiscal year 2017 reveal that compensation to Jones from his nonprofit organization alone totaled \$381,263.⁴²

There is also no reason to suspect that any common exception to the Gift Rule applies in this instance. For example, Jones’ services do not appear to constitute a gift from a close family member, a gift made solely on the basis of personal friendship, or a gift from current colleagues. In addition, unlike the “newsletter” that TDIP reportedly sent of its own volition to certain Democratic leaders and the news media,⁴³ here the Committee allegedly requested TDIP and Jones to conduct a much more robust type of technical research, which required him to hire experts from his own funds with no charge to the Committee.

The fact that TDIP and Jones were essentially studying and selectively funneling alleged “findings” to their political allies in Congress with little transparency is concerning,⁴⁴ but that

³⁶ See Senate Rule 35.1(c)(3).

³⁷ See Senate Rule 35.1(c)(4); *see also* Senate Rule 35.1(e).

³⁸ See Senate Rule 35.1(c)(6).

³⁹ See Compl., ¶ 28.

⁴⁰ *Id.* ¶ 29.

⁴¹ See *id.* ¶¶ 24-25 (explaining that the Committee “requested that Mr. Jones evaluate information *it had received* about DNS look-ups between Alfa Bank servers and Trump Organizations from a “source” that was an “individual or entity with sensitive contracts with the U.S. government”) (emphasis added).

⁴² *Democracy Integrity Project*, ProPublica (last accessed Oct. 6, 2021), available at <https://projects.propublica.org/nonprofits/organizations/815223488>.

⁴³ See, e.g., Paul Sperry, *Dossier-Tied Firm Pitches Reporters Daily on ‘Collusion,’* RealClear Politics (Mar. 22, 2019), available at https://www.realclearpolitics.com/articles/2019/03/22/trump-russia_20_dossier-tied_firm_pitching_journalists_daily_on_collusion_139825.html; Paul Sperry, *Soros-Funded PR Shop Constructing Media Echo Chamber to Push Impeachment*, The Federalist (Mar. 21, 2019), available at <https://thefederalist.com/2019/03/21/soros-funded-pr-shop-constructing-media-echo-chamber-push-impeachment/>.

⁴⁴ As Senator Grassley informed Senator Coons in May 2018, Fusion GPS Founder Glenn Simpson concealed his relationship with Jones during his August 2017 transcribed interview with the Senate Judiciary Committee. See Letter from Senate Judiciary Committee Chairman Charles Grassley to Senator Christopher Coons at 2 (May 29, 2018), available at <https://www.judiciary.senate.gov/imo/media/doc/2018-05->

alone would not implicate the Gift Rule. Congressional committees frequently receive and review freely available public research conducted by think tanks and outside experts to inform their understanding of important issues. However, that does not appear to be what happened here. By contrast, here it appears that the Committee received and provided nonpublic data to TDIP and solicited expert analysis of that data. The data and the 687-page TDIP report for the Committee remained nonpublic, while TDIP paid for the analysis and the Committee did not.⁴⁵

The Need for an Investigation

How the Committee obtained the data is unclear and may raise further issues upon further investigation, including potential violations of other Senate Rules. Not only are these ethical issues likely to recur in the future, but the subject matter is of intense public interest and could cast the Senate in a negative light if the facts remain unclear. This topic is the subject of a Special Counsel investigation that resulted in an indictment just weeks ago. The Senate has an interest in getting to the bottom of what happened.

Moreover, the American people deserve to know whether the Committee solicited and accepted free services to further its most politically sensitive investigative work from a nonprofit with deeply partisan ties to a small group of billionaires. There is no transparency regarding what other business those wealthy donors might have before the Committee, and thus, no public assurance that, by bankrolling investigative services for the Committee through TDIP and Jones, they are not currying favor in ways that present conflicts of interest for Senators and staff in the exercise of their official duties.

Only a Senate Ethics Committee inquiry can answer these questions and re-assure the public that Senators and staff are either following the rules or being held accountable for their failure to do so. During our long public service in both the House and Senate, Empower Oversight's leadership were consistently advised that soliciting and accepting outside services from professional experts, even in the conduct of our official duties, could run afoul of the rules prohibiting gifts where the services were not compensated from official funds.⁴⁶

If it is now permissible for committee staff and Senators to confidentially solicit and accept professional expert services to further their official oversight functions without any public disclosure, without providing any compensation from official funds, and without violating the

[29%20CEG%20to%20Coons%20\(Trump%20Jr%20Interview\).pdf](#) (“Contrary to Mr. Simpson’s denial in the staff interview, according to the FBI and others, Fusion actually did continue Trump dossier work for a new client after the election. ... [Jones] ... ‘had secured the services Steele, his associate [redacted], and Fusion GPS to continue exposing Russian interference[.]’”)

⁴⁵ TDIP and Jones allege in their Complaint that the Committee “requested that Mr. Jones evaluate information it had received” from a confidential source, which TDIP and Jones “agreed to receive and analyze,” and did so through “retain[ing] computer scientists to examine the data” and in ultimately producing its confidential 687-page report. *See* Compl. ¶¶ 24, 27, 30. Such conduct by the Committee raises questions of whether this selective sharing of confidential information with TDIP was properly authorized, or conversely, violated Senate Rule XXIX(5), which prohibits the disclosure of “secret or confidential business” of the Senate, including “the business and proceedings of the committees,” and imposes dismissal of liable employees or officers and punishment for contempt.

⁴⁶ One exception to this prohibition, although not applicable to the facts described herein, is the provision of pro bono services provided in order to assist a Member to file an amicus curiae brief. In that instance, the Member need not establish a legal expense trust fund. *See supra* n. 2, at 31.

Gift Rule—then the Select Committee on Ethics should publish clear guidance to that effect so that all Senators and staff can operate on a level playing field.

However, such a major deviation from the historical practice of the Senate could have far reaching implications for how congressional oversight investigations are conducted in the future and should be carefully considered and debated.

Conclusion:

Empower Oversight requests that the Select Committee on Ethics immediately initiate a preliminary inquiry into the conduct of staff and members of the Senate Armed Services Committee, including T. Kirk McConnell, regarding the 2017 request to TDIP and Jones and the circumstances described above.

For the reasons set forth, Empower Oversight respectfully submits that the recent revelations in TDIP's court filing, and the issues raised by those revelations, are significant enough to require such a review and public resolution.

Thank you for your time and consideration.

Cordially,

[/Jason Foster/](#)

Jason Foster
Founder & President

Attachments

cc: Patricia M. Bryan & Morgan J. Frankel
Office of Senate Legal Counsel