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


2. Letter from Jeff Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration, to J. Gerald Herbert of Complainant Campaign Legal Center (date-stamped Jan. 2, 2013) (acknowledging receipt of administrative complaint) and
Enclosure* (description of FEC procedures for handling complaints).

3. Letter from Jeff Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration, to Fred Wertheimer of Complainant Democracy 21 (date-stamped Jan. 2, 2013) (acknowledging receipt of administrative complaint) and Enclosure* (description of FEC procedures for handling complaints).

4. Letter from Jeff Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration, to William S. Rose, Jr., Specialty Investments Group (date-stamped Jan. 2, 2013) (advising of receipt of administrative complaint) and Enclosure* (copy of Administrative Complaint included at AR0301-11, description of FEC procedures for handling complaints, and Designation of Counsel form).

5. Letter from Jeff Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration, to William S. Rose, Jr., Kingston Pike Development LLC (date-stamped Jan. 2, 2013) (advising of receipt of administrative complaint) and Enclosure* (copy of Administrative Complaint included at AR0301-11, description of FEC procedures for handling complaints, and Designation of Counsel form).


7. Letter from Jeff Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration, to Ryan Hecker, Treasurer, FreedomWorks for America ("FWFA") (date-stamped Jan. 2, 2013) (advising of receipt of administrative complaint) and Enclosure* (copy of Administrative Complaint included at AR0301-11, description of FEC procedures for handling complaints, and Designation of Counsel form).

Enclosures and attachments identified with an asterisk are not included in the administrative record.
procedures for handling complaints, and Designation of Counsel form).

8. Letter from J. Gerald Herbert of Complainant Campaign Legal Center and Fred Wertheimer of Complainant Democracy 21 to Anthony Herman, then-General Counsel, Federal Election Commission (dated Jan. 3, 2013) (attaching supplemental material to administrative complaint) and Attachment (news article).

9. Letter from William J. McGinley, Counsel to FWFA, and Ryan Hecker, Treasurer of FWFA, to Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division (dated Jan. 16, 2013) (requesting extension of time to respond to administrative complaint) and Enclosure (completed Designation of Counsel form).


11. Email from Kenneth A. Gross, counsel to William S. Rose, Jr., Kingston Pike Development, LLC, and Specialty Investments Group, to Kim Collins, Paralegal, FEC Complaints Examination & Legal Administration Division, with a copy to Gregory B. Craig (dated Jan. 23, 2013) (requesting extension of time to respond to administrative complaint) and Attachments (completed Designation of Counsel forms).


15. Amended Administrative Complaint (dated Apr. 23, 2013) and Attachment* (article included at AR0324-28).

16. Letter from Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to Fred Wertheimer of Complainant Democracy 21 (date-stamped Apr. 25, 2013) (acknowledging receipt of amendment to administrative complaint).

17. Letter from Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to J. Gerald Herbert of Complainant Campaign Legal Center (date-stamped Apr. 25, 2013) (acknowledging receipt of administrative complaint).

18. Letter from Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to Adam Brandon, Executive Vice President, FWFA (date-stamped Apr. 25, 2013) (notification of administrative complaint) and Enclosures* (amended administrative complaint and attachment included at AR0343-48 and AR0324-28, respectively, initial administrative complaint included at AR0301-11, description of FEC procedures for handling complaints, and designation of counsel form).

19. Letter from Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to Richard J. Stephenson, Member of Board of Directors, FWFA (date-stamped Apr. 25, 2013) (notification of administrative complaint) and Enclosures* (amended administrative complaint and attachment included at AR0343-48 and AR0324-28, respectively, initial administrative complaint included at AR0301-11, description of FEC procedures for handling complaints, and designation of counsel form).
20. Letter from Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to Kenneth A. Gross, Counsel for William S. Rose, Jr., Kingston Pike Development, LLC, and Specialty Investments Group, Inc. (date-stamped Apr. 25, 2013) (notification of additional information concerning the administrative complaint) and Enclosure* (amended administrative complaint and attachment included at AR0343-48 and AR0324-28, respectively).

21. Letter from Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to William J. McGinley, Counsel for FWFA and Ryan Hecker, Treasurer of FWFA (date-stamped Apr. 25, 2013) (notification of additional information concerning the administrative complaint) and Enclosure* (amended administrative complaint and attachment included at AR0343-48 and AR0324-28, respectively).

22. Letter from William J. McGinley, Counsel for FWFA, to Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division (dated May 1, 2013) (requesting extension of time to respond to the amended administrative complaint).

23. Letter from Kim Collins, Paralegal, FEC Complaints Examination & Legal Administration Division, to William J. McGinley, Counsel for FWFA (dated May 1, 2013) (notifying that requested extension of time was granted).

24. Letter from George J. Terwilliger, III, Counsel for Richard J. Stephenson, to Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division (dated May 9, 2013) (requesting extension of time to respond to the amended administrative complaint) and Enclosure (completed Designation of Counsel form).

25. Letter from Heidi K. Abegg, Counsel for Adam Brandon, to Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division (dated May 10, 2013) (requesting extension of time to respond to the administrative complaint) and Enclosure (completed Designation of Counsel form).


29. Letter from Brian A. Benczkowski, Counsel for Adam Brandon, to Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division (dated June 11, 2013) (requesting extension of time to respond to the administrative complaint).


34. Response of Adam Brandon to the Amended Complaint (Letter from Brian A. Benczkowski, Counsel for Adam Brandon, to Jeff S. Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division (dated June 27, 2013)).
35. FEC First General Counsel’s Report (date-stamped June 17, 2014), Attachments 1-3 (materials referenced in the report), Attachment 4 (proposed Factual and Legal Analysis (Specialty Investments Group, et al.)), Attachment 5 (proposed Factual and Legal Analysis (Stephenson)), Attachment 6 (proposed Factual and Legal Analysis (Brandon)), and Attachment 7 (proposed Factual and Legal Analysis (FWFA)).


44. Letter from Brian A. Benczkowski, Counsel for Adam Brandon, to Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division (dated Oct. 26, 2015) (requesting future correspondence re: Adam Brandon be directed to him) and Enclosures* (Letter from Mark D. Shonkwiler included at AR0536 [to Heidi K. Abegg and Alan P. Dye, Counsel for Adam Brandon (date-stamped Oct. 20, 2015)] and completed Designation of Counsel form included at AR0366).

45. Amended Certification† by the FEC Deputy Secretary of the Commissioners’ October 29, 2015 votes in MUR 6711 (certification signed and dated Nov. 2, 2015).

46. Certification by the FEC Deputy Secretary of the Commissioners’ November 17, 2015 votes in MUR 6711 (certification signed and dated Nov. 18, 2015).

47. Certification by the FEC Deputy Secretary of the Commissioners’ February 23, 2016 votes in MUR 6711 (certification signed and dated Feb. 24, 2016).

48. Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division, to Brian A. Benczkowski, Counsel for Adam Brandon (date-stamped Mar. 4, 2016) (providing notification of file closure).

49. Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division, to Fred Wertheimer of Complainant Democracy 21 (date-stamped Mar. 4, 2016) (providing notification of file closure).

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

51. Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division, to George J. Terwilliger, III, Counsel to Richard J. Stephenson (date-stamped Mar. 4, 2016) (providing notification of file closure).

52. Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division, to J. Gerald Herbert of Complainant Campaign Legal Center (date-stamped Mar. 4, 2016) (providing notification of file closure).

53. Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division, to William J. McGinley and Benjamin L. Ginsberg, Counsel to FWFA and Melodie Johnson, Treasurer of FWFA (date-stamped Mar. 4, 2016) (providing notification of file closure).

54. Statement of Reasons of FEC then-Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Lee E. Goodman in MURs 6485, 6487, 6488, 6711 & 6930 (signed and dated Apr. 1, 2016).

55. Statement of Reasons of FEC then-Vice Chairman Steven T. Walther, then-Commissioner Ann M. Ravel, and Commissioner Ellen L. Weintraub in MURs 6485, 6487, 6488, 6711 & 6930 (signed and dated Apr. 1, 2016).

56. Statement of then-Commissioner Ann M. Ravel and Commissioner Ellen L. Weintraub in MURs 6485, 6487, 6488, 6711 & 6930 (signed and dated Apr. 13, 2016).

57. Supplemental Statement of then-Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Lee E. Goodman in MURs 6485, 6487, 6488, 6711 & 6930 (signed and dated Apr. 18, 2016).
IN TESTIMONY WHEREOF, the Secretary and Clerk of the Federal Election Commission, being duly authorized, has set her hand and affixed the seal of the Federal Election Commission in the city of Washington, District of Columbia, this 11th day of May, 2017.

Dayna C. Brown
Secretary and Clerk
Federal Election Commission