ELECTION LAW NEWS

Developments in All Aspects of Political Law | November 2015

California Cracks Down on Coordination Through New Rules

By Caleb P. Burns and Eric Wang

The California Fair Political Practices Commission (FPPC) recently amended its regulations to crack down on many practices by super PACs that have become commonplace in federal races and in some other jurisdictions. The FPPC's rules, which apply only to elections for California state and local office, were hailed by critics of the post-*Citizens United* campaign finance landscape as much-needed remedies to curb perceived abuses in political spending. Free speech advocates criticized the rules for being excessively vague, overbroad, and having the potential, in effect, to prohibit independent political speech altogether.

Super PACs are political committees that may accept unlimited contributions from individuals, corporations, and unions for the purpose of sponsoring independent expenditures that support or oppose candidates. Because super PACs are not subject to California's contribution limits, however, they are prohibited from making contributions (whether monetary or in-kind) to California state and local candidates. The FPPC's revised rules address the crucial distinction between independent expenditures, which are permitted for super PACs, and expenditures that are deemed to be coordinated with candidates and regulated as in-kind contributions, which Super PACs are prohibited from making.

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Coming Soon: Amnesty for New York State Lobbyist Registration and Reporting Violations

By D. Mark Renaud and Eric Wang

New York State's Joint Commission on Public Ethics (JCOPE) recently announced an amnesty program for lobbyists and clients who have participated in lobbying activities in the state but have failed to register and report as required. The program, which will take effect at the beginning of next year, may allow certain lobbyists and clients to avoid large penalties by retrospectively filing missed registrations and reports.

New York State law broadly regulates lobbying of the state executive and legislative branches, as well as local governments in jurisdictions with a population of more than 5,000, with respect to most official actions, including procurement decisions. "Grassroots lobbying"—making appeals to members of the public to lobby public officials on issues—is also regulated. Retained and in-

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State Lobbying Law Update: Kansas and Texas

By Carol A. Laham and Stephen J. Kenny

Kansas recently raised its threshold for qualifying as an expenditure lobbyist. Previously, Kansas required anyone who made expenditures in an aggregate amount of $100 or more in a calendar year for lobbying, exclusive of personal travel and subsistence expenses, to register as a lobbyist. The new threshold is now $1,000. Kansas also raised the registration fee for expenditure lobbyists to $425.

For its part, Texas has added an additional exception to its lobbyist registration requirements. Under existing law, a person must register if he or she made lobbying expenditures over $500 in a calendar quarter or was entitled to receive compensation or reimbursement over $1,000 in a calendar quarter for lobbying. In addition to the exception for lobbyists who spend no more than 5% of their compensated time in a calendar quarter engaged in lobbying activity, a provision recently went into effect that adds a 26-hour registration threshold. A person that spends 26 hours or less on lobbying in a calendar quarter—inclusive of preparatory activity—is not required to register as a lobbyist. The legislation authorizes the Texas Ethics Commission to alter this threshold. The legislation also provides that the ceiling for the amount of time per day that may count toward the threshold is eight hours.

Texas also recently extended the ban on contingency lobbying to independent contractors of vendors involved in purchasing decisions. Effective January 1, 2016, independent contractors lobbying an agency in connection with purchasing decisions must register as lobbyists. ■

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Texas Ethics Commission Adopts New Rules for Campaign Expenditures and Discounted Items

By Carol A. Laham and Louisa Brooks

The Texas Ethics Commission recently adopted several updates to its rules for reporting of political contributions and expenditures. The Commission adopted a formal definition for expenditures made "in connection with a campaign" and clarified when a discount constitutes a reportable in-kind contribution. As we previously noted, the new definitions will affect if and when a group must register and report as a political committee in Texas, as well as its obligation to file independent expenditure reports. All of the new provisions are in effect as of October 27, 2015.

After several revisions to the draft language, the final adopted rule clarifies that the following expenditures are made "in connection with a campaign":

- An expenditure that expressly advocates for or against a candidate or ballot measure;
- An expenditure made by a candidate or political committee to support or oppose a candidate;
- An expenditure that is a campaign contribution to a candidate or political committee; and
- An expenditure for a communication that refers to a clearly identified candidate and is broadcast or distributed within 30 days of an election to the geographical area the candidate seeks to represent.

In addition, the Commission adopted a formal definition of a "discount" and integrated guidelines to determine when a discount would become a reportable in-kind contribution. The new regulations clarify that a discount is any difference between the fair market value of the goods or services received and the amount actually charged for those goods or services. Discounts constitute an in-kind political

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SEC Pushes Political Intelligence Investigation Against U.S. House

By Robert L. Walker

The U.S. Securities and Exchange Commission (SEC) continues to push the insider trading enforcement envelope to cover cases involving alleged tips of "political intelligence" from federal government sources, as confirmed in a recent filing in the U.S. District Court for the Southern District of New York. The SEC's continued push in the political intelligence arena comes despite recent developments in the law of insider trading in the federal courts that have caused the SEC and federal prosecutors to retrench, in other ways, their enforcement efforts.

On October 5, 2015, the SEC, through its New York Regional Office, filed a letter with U.S. District Judge Paul G. Gardephe in Manhattan in an attempt to move the court to rule on a long-pending action seeking enforcement of investigative subpoenas issued by the SEC in May 2014 to the Committee on Ways and Means of the U.S. House of Representatives and to a then-senior Health Subcommittee staffer. The SEC issued its subpoenas as part of its investigation into allegations that spikes in trading volume and in the value of the securities of certain health insurance companies on April 1, 2013, may have resulted from the leak from the federal government of material, nonpublic information regarding a change in Medicare Advantage reimbursement rates favorable to the insurers. The SEC originally sought enforcement of its subpoenas to the Ways and Means Committee and to the now-former senior staffer in June 2014.

As the exchange of court filings in this matter shows, since June 2014 lawyers for the SEC and lawyers for the House Office of General Counsel have sparred repeatedly over one do-or-die issue: Does the Speech or Debate Clause of the U.S. Constitution confer blanket immunity to both the Ways and Means Committee and to the former House staffer such that the SEC's investigative subpoenas to them are unconstitutional and unenforceable?

In its October 5, 2015 letter to Judge Gardephe, the SEC cites a September 28, 2015 ruling by the U.S. District Court for the District of New Jersey in the pending corruption prosecution of U.S. Senator Bob Menendez. The SEC views that Menendez ruling as adding to what it calls "the overwhelming weight of authority previously by the Commission that [the House's] wholesale refusal to respond to the Commission's lawful subpoenas through a blanket and unsupported assertion of privilege under the [Speech or Debate] Clause is utterly baseless under the law." As additional support for its position, the SEC, in a footnote, also cites a recent ruling by

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New York State Seeking Public Comment on Proposed Pay-to-Play-Type Contribution Prohibition

By D. Mark Renaud and Eric Wang

New York State's Joint Commission on Public Ethics (JCOPE) recently issued a draft advisory opinion that would prohibit statewide executive and legislative branch elected officials from accepting campaign contributions from certain persons subject to their enforcement powers. JCOPE is seeking public comment on its proposed interpretation, which is based on a state ethics law prohibiting officers and employees from engaging in any transactions that are in "substantial conflict with the proper discharge" of their official duties or that create the "impression that any person can improperly influence" them.

Although these statutory provisions are quite vague and do not specifically address political contributions, JCOPE's predecessor agency interpreted them in a 1998 advisory opinion to prohibit state employees from soliciting political contributions on behalf of candidates and elected officials from individuals or business entities which (1) have matters before the employee or the agency an employee supervises; (2) the employee has substantial reason to believe will have matters before the employee or agency the employee supervises; or (3) had matters within the past 12 months before the employee or agency the employee supervises. The 1998 opinion exempted statewide elected officials from the solicitation prohibition, and did not address legislative officials and employees because the

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Wisconsin Legislature Abolishes "John Doe" Investigations for Campaign Finance Violations, Seeks to Amend Campaign Finance and Ethics Laws

By Jan Witold Baran and Stephen J. Kenny

In the wake of the Wisconsin Supreme Court's decision to shut down the state's "John Doe" investigation into whether Governor Scott Walker's campaign illegally coordinated with conservative advocacy groups, Governor Walker recently signed into law a bill that curtails prosecutors' ability to use secretive investigatory tactics. The Governor and the legislature are also considering other changes to the state's campaign finance laws and enforcement system.

Last July, the Wisconsin Supreme Court put an end to a state prosecutor's "John Doe" investigation of Governor Walker's campaign and various conservative advocacy groups. The "John Doe" statute in Wisconsin grants special powers to prosecutors in criminal investigations—such as the authority to compel witness testimony and the power to issue subpoenas to witnesses to submit documents—thereby avoiding the need to impanel a grand jury. Significantly, a judge can order the proceedings to be done in secret and place gag orders on witnesses.

The Wisconsin Supreme Court ended the "John Doe" probe because the conduct alleged by the state prosecutors was not illegal. Prosecutors alleged that Walker's campaign illegally coordinated with issue advocacy groups during the course of Walker's 2012 recall campaign. The court concluded, however, that Wisconsin's campaign finance statutes validly extend only to express advocacy communications. Because issue advocacy communications—coordinated or not—are beyond the reach of the state's campaign finance laws, the prosecutors did not offer a valid theory of illegal coordination. Consequently, the court ordered the termination of the "John Doe" probe.

The legislature, animated by perceived abuses by the prosecutors during the investigation of illegal coordination, passed a bill that restricted the use of "John Doe" investigative powers to serious felonies and certain other violent crimes. In other words, campaign finance and ethics allegations are no longer within the purview of the "John Doe" statute. Of course, prosecutors may still investigate such crimes, just without the extraordinary tools offered by the "John Doe" statute.

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2016 Primary Season Is upon Us: Deadline Reminders for Coordinated and Electioneering Communications during Presidential Primaries

By Michael E. Toner and Louisa Brooks

While the 2016 general election is still a year away, the first state presidential primaries are now less than 90 days away. Primary season presents a number of compliance and reporting challenges, and corporations, trade associations, and others should be mindful of the coordination and electioneering periods for these presidential primaries.

Under federal campaign finance law, certain public communications that are coordinated with a federal candidate or political party are considered in-kind contributions to the candidate or party. This means that persons like corporations and labor unions who are prohibited from contributing to candidates are also prohibited from engaging in coordinated communications. It also means that coordinated communications are subject to federal contribution limits, and persons who are permitted to make such contributions—e.g., individuals and political committees—may only spend money on coordinated communications up to those limits.

One important type of coordinated communication for corporations, trade associations, and others to know are public communications that mention or depict a federal candidate and are distributed in a relevant jurisdiction within a number of days of the election. For presidential primary elections, the coordination "black-out" periods begin 120 days before the primary. The chart below provides triggering dates in the early states. Importantly, the coordination blackout, once triggered in a particular state, continues in that state through

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IMPORTANT: Maryland Pay-to-Play Report Due November 30

See Maryland Irons Out Its Pay-to-Play Contribution Disclosure Regime (July 2015)
http://www.wileyrein.com/newsroom-newsletters-item-5387.html

Coming Soon: Amnesty for New York State Lobbyist Registration and Reporting Violations *continued from page 1*

house lobbyists who earn or spend more than a certain dollar threshold each year are required to register with JCOPE. Although principals and clients of lobbyists technically are not required to register, JCOPE recommends that corporations employing in-house lobbyists register themselves as the lobbyist and list their employees who engage in lobbying.

Registered lobbyists in New York are required to file bimonthly disclosure reports, while principals and clients of registered lobbyists are required to file reports semiannually. Corporations that are themselves registered as lobbyists are treated as both lobbyists and clients and must file bimonthly and semiannual reports. These reports require disclosure of information such as the general subjects and specific items lobbied on, the names of individuals or entities lobbied, and amounts spent on lobbying. Under certain circumstances, lobbyist principals and clients also may be required to disclose their sources of funding used for lobbying.

JCOPE is authorized by law to impose late fees of up to $25 for each day that a registration statement, lobbyist bimonthly report, or client/principal semiannual report is late. In addition, fines of up to $25,000 or three times the amount of lobbying expenditures not reported may be imposed for knowing and willful violations. JCOPE also may conduct random audits of lobbying registration statements and reports to ensure that expenditures are being reported properly.

In recent months, JCOPE has publicly released conciliation agreements setting forth penalties for the following lobbying violations:

- $50,000 for an entity that was registered to lobby on its own behalf, and that failed to file various lobbyist bimonthly reports and client/principal semiannual reports between 2010 and 2015. This amount included a prior settlement of $11,000 for related violations that the respondent had failed to pay, plus late fees and interest;
- $6,000 for a lobbyist client that failed to file two lobbyist client semiannual reports over the course of a year;
- $2,000 for a lobbyist client that failed to file two lobbyist client semiannual reports over the course of a year. The respondent also agreed to permit JCOPE to review respondent's records to determine whether filings are being made in a timely and accurate manner (in addition to JCOPE's general audit authority);
- $15,000 for a lobbying firm that hired a subcontractor lobbying firm to lobby on behalf of a client. The primary lobbying firm failed to register and file bimonthly lobbyist reports and principal/client semiannual reports over the course of a year. The subcontractor lobbying firm also agreed to pay a penalty of $12,000 for failing to register and file bimonthly lobbyist reports.

From January 1, 2016 through June 30, 2016, lobbyists and clients that have failed to file the requisite registration and disclosure reports in New York State may be eligible to file late without penalties under JCOPE's amnesty program. However, the program only applies to lobbyists and clients who have not previously registered or filed reports. Lobbyists who are already registered, or clients who have previously filed reports, and who have simply fallen behind on their ongoing reporting obligations are not eligible for the amnesty program. ■

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Former FEC Chairman's Counsel Andrew Woodson Rejoins Wiley Rein

Andrew G. Woodson, former counsel to Federal Election Commission (FEC) Chairman Lee E. Goodman, has joined the firm's highly regarded Election Law & Government Ethics Practice as a partner. Mr. Woodson, who previously served as of counsel at the firm, will advise clients in complying with state and federal campaign finance, ethics, and lobbying laws, assist clients in filing comments with the FEC and responding to enforcement proceedings, and pursue legal relief for clients when state or federal law infringes upon their First Amendment rights.

While at the FEC, Mr. Woodson advised Chairman Goodman on both policy and enforcement matters. During his chairmanship, Commissioner Goodman was an outspoken advocate of media and Internet freedom at the FEC, as well as a vocal supporter of federal, state, and local political parties.

In addition to his private practice experience and service at the FEC, Mr. Woodson served as a legislative assistant in the Office of Congressman Eric Cantor. He received his J.D. and his undergraduate degree from the University of Virginia.

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New York State Seeking Public Comment on Proposed Pay-to-Play-Type Contribution Prohibition
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predecessor agency lacked jurisdiction over the legislature.

JCOPE's latest draft opinion would extend the 1998 opinion to prohibit statewide elected officials and members of the legislature from soliciting and accepting contributions from individuals and entities if they are subject to the "investigative, prosecutorial, or audit power" of the elected official or the official's agency, or if they are involved in litigation adverse to the elected official or official's agency. The contribution prohibition also would extend to owners and certain other parties with a financial interest in an affected corporation or entity, as well as certain relatives of affected individuals.

Consistent with the 1998 opinion, it appears that the latest proposal would apply the contribution ban not only to pending conflicts, but also prospectively to anticipated conflicts and retrospectively to conflicts during the past 12 months. Although the proposal does not appear on its face to apply to candidates who are not incumbents at the time they are campaigning, candidates who accept contributions and are elected may later be required to recuse themselves from participating in matters where they accepted contributions from someone subject to their or their agency's enforcement powers.

JCOPE has not established a deadline as of this time for accepting public comments on this proposed interpretation of the state ethics law. Please contact us if you are interested in submitting a comment, or if you have any questions about the proposal. ■

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Texas Ethics Commission Adopts New Rules for Campaign Expenditures and Discounted Items
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contribution unless the terms reflect normal industry practice and are typical of terms offered to political and non-political persons alike. ■

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2016 Primary Season Is upon Us: Deadline Reminders for Coordinated and Electioneering Communications during Presidential Primaries *continued from page 4*

the 2016 general election with respect to coordinated communications that mention or depict Presidential candidates. (Note that the rules for Senate and House candidates are different.)

The other deadline to keep in mind is for "electioneering communications," which are broadcast, cable, or satellite communications that mention a candidate and are distributed within 30 days of a presidential primary. Corporations may make electioneering communications, but it is important to remember that certain communications featuring presidential candidates will trigger reporting requirements if made during the 30 days before a primary. Again, the chart below provides the relevant deadlines in the early states. ■

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Upcoming Coordination & FEC Trigger Dates

State	Party	Presidential Primary Date	Electioneering Communication Window Begins	Coordination Window Begins
Iowa	Both	Feb. 1, 2016	Jan. 2, 2016	Oct. 4, 2015
New Hampshire	Both	Feb. 9, 2016	Jan. 10, 2016	Oct. 12, 2015
Nevada	Democratic	Feb. 20, 2016	Jan. 21, 2016	Oct. 23, 2015
South Carolina	Republican	Feb. 20, 2016	Jan. 21, 2016	Oct. 23, 2015
Nevada	Republican	Feb. 23, 2016	Jan. 24, 2016	Oct. 26, 2015
South Carolina	Democratic	Feb. 27, 2016	Jan. 28, 2016	Oct. 30, 2015
Alabama	Both	Mar. 1, 2016	Jan. 31, 2016	Nov. 2, 2015
Alaska	Republican	Mar. 1, 2016	Jan. 31, 2016	Nov. 2, 2015
Arkansas	Both	Mar. 1, 2016	Jan. 31, 2016	Nov. 2, 2015
Colorado	Both	Mar. 1, 2016	Jan. 31, 2016	Nov. 2, 2015
Georgia	Both	Mar. 1, 2016	Jan. 31, 2016	Nov. 2, 2015
Massachusetts	Both	Mar. 1, 2016	Jan. 31, 2016	Nov. 2, 2015
Minnesota	Both	Mar. 1, 2016	Jan. 31, 2016	Nov. 2, 2015
Oklahoma	Both	Mar. 1, 2016	Jan. 31, 2016	Nov. 2, 2015
Tennessee	Both	Mar. 1, 2016	Jan. 31, 2016	Nov. 2, 2015
Texas	Both	Mar. 1, 2016	Jan. 31, 2016	Nov. 2, 2015
Vermont	Both	Mar. 1, 2016	Jan. 31, 2016	Nov. 2, 2015
Virginia	Both	Mar. 1, 2016	Jan. 31, 2016	Nov. 2, 2015
Wyoming	Republican	Mar. 1, 2016	Jan. 31, 2016	Nov. 2, 2015

Source: Federal Election Commission

Wisconsin Legislature Abolishes "John Doe" Investigations for Campaign Finance Violations, Seeks to Amend Campaign Finance and Ethics Laws *continued from page 4*

The state legislature also passed two other campaign finance bills recently. First, the legislature passed a bill that abolishes the Government Accountability Board (GAB) and replaces it with two separate agencies with jurisdiction of campaign finance and ethics, respectively. The GAB currently has jurisdiction of all campaign finance and ethics laws. Officially nonpartisan, the GAB came under fire for its role in the "John Doe" coordination investigations. The replacement agencies, by contrast, would include partisan appointees, much like the Federal Election Commission.

The second bill limits disclosure requirements to those entities whose "major purpose" is engaging in express advocacy or supporting candidates. The legislation—which is a response to the U.S. Court of Appeals for the Seventh Circuit's recent decision in *Wisconsin Right To Life, Inc. v. Barland*, 751 F.3d 804 (7th Cir. 2014), holding the existing disclosure provisions unconstitutionally vague—specifies that an entity's major purpose is based on the entity's organizational documents or the entity's own representations, as well as the proportion of the entity's spending dedicated to express advocacy and contributions. Governor Walker is expected to sign both bills. ■

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SEC Pushes Political Intelligence Investigation Against U.S. House *continued from page 3*

the Third Circuit in the pending prosecution of Congressman Chaka Fattah in federal court in Philadelphia.

Not surprisingly, in its October 9, 2015 response to the SEC's October 5 letter, the House Office of General Counsel, on behalf of both the Ways and Means Committee and the former staffer, dismisses the SEC's most recent arguments. Regarding the court's decision in the Menendez case, the House attorneys argue that "even assuming it was correctly decided in the context of the law in its own circuit, a proposition on which we do not comment," that decision "has no bearing on the instant case."

Interestingly, the SEC's October 5 letter in the House subpoena enforcement matter was filed on the same day that the Supreme Court of the United States announced its decision not to review the decision by the U.S. Court of Appeals for the Second Circuit in the matter of the *U.S. v. Newman and Chiasson*. In that matter, in summary, the court ruled that, to prove an insider trading violation by a recipient of a tip of material, nonpublic information, the government had to prove that the recipient (tippee) knew (or, in the civil context at least, should have known) both that the original source of the information (tipper) provided the information in breach of a duty of trust and confidence and that the tippee knew that the tipper had breached this duty for some specific personal benefit. The Second Circuit's decision, and the Supreme Court's determination to let that decision stand, have been widely seen as slamming the brakes—at least temporarily—on expansionist insider trading enforcement efforts of recent years by both the SEC and the Department of Justice, particularly the U.S. Attorney's Office for the Southern District of New York.

And yet the SEC is moving forward in its novel and controversial effort to investigate the Congress in an insider trading case. To many, in following this path the SEC is only doing what Congress directed it to do by passing the Stop Trading on Congressional Knowledge (STOCK) Act of 2012: holding Members and staff of Congress to the same standards of insider trading investigation and enforcement as are applied to other participants in the securities trading arena.

The SEC closed its October 5 letter to Judge Gardephe with this observation on the apparent stalemate with the House: "If the Commission is to conduct a meaningful investigation into this matter, it must be able to review relevant documents and take testimony from relevant witnesses promptly, before memories fade and the investigative trail grows cold." But whether the Constitution permits such a "meaningful investigation" in the congressional context remains the difficult, undecided, and dispositive question. ■

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Perhaps the most open-ended aspect of the FPPC's revised rules is that an expenditure is presumed to be coordinated if it is made on the basis of information about a candidate's "campaign needs or plans" (such as "campaign messaging, planned expenditures, or polling data") if such information is conveyed "directly or indirectly" to the sponsor of an independent expenditure. As one set of comments opposing the FPPC's rulemaking noted, candidates and their campaigns discuss their campaign messaging, planned expenditures, and polling data with the media all the time, and sponsors of independent expenditures are thus able to learn about candidates' campaign needs or plans "indirectly" through news reports.

Unlike the federal rules, the FPPC's new rules do not provide an exemption for information obtained through publicly available sources. Thus, sponsors of independent expenditures may be forced to prove that they have completely isolated themselves from any news reporting about the campaigns, which is impracticable and unreasonable. Alternatively, campaigns will either have to stop talking to the media altogether about their campaign plans and strategies, or independent groups will have to stop sponsoring independent expenditures—a result that is incompatible with recent court rulings and the First Amendment.

Super PACs' reliance on former employees and consultants of candidates is another issue that frequently arises. Because these individuals may possess information about a candidate's campaign plans and strategy, the federal rules impose a 120 day cooling-off period before these individuals may work on an independent expenditure campaign benefitting the candidate. Otherwise, the expenditure may not qualify as being independent. The FPPC's amended rules impose a far lengthier cooling-off period in California for former employees and consultants that begins 12 months prior to the date of the primary or special election in which the candidate for whom these individuals used to work is on the ballot, and going through the date of the general or special runoff election. Effectively, a candidate's employees and consultants will be precluded from working on independent expenditures supporting that candidate for the entire campaign.

The FPPC's revised rules further diverge from the federal rules in their treatment of candidate fundraising and family support for super PACs. While the Federal Election Commission (FEC) has permitted candidates for federal office to appear at super PAC events and to solicit contributions to super PACs under certain circumstances, the FPPC's revised rules would treat these practices as presumptive evidence of coordination with California state and local candidates.

Super PACs that are established, run, or principally funded by an immediate family member of a California candidate also would be presumed to be coordinating with that candidate under the revised FPPC rules. The federal rules, by contrast, do not address family contributions to super PACs supporting federal candidates. As comments on the FPPC rulemaking noted, the U.S. Supreme Court upheld limits on direct contributions from family members to federal candidates in Buckley v. Valeo, but questioned the anti-corruption rationale for such limits. Because the Supreme Court's Citizens United decision held that independent speech poses an attenuated risk of corruption, the FPPC's severe regulation of independent speech by candidates' family members may be susceptible to a constitutional challenge.

Lastly, the revised FPPC rules presume that an independent group's use of video footage created by a California candidate is coordination, regardless of whether the footage was obtained from a publicly available source, and regardless of how minimal the use of the footage may be. On the other hand, the FPPC rules still permit independent groups to use campaign photos. Regulators at the FEC have been unable to agree on this issue. ■

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SPEECHES/UPCOMING EVENTS

Latest Developments in Campaign Finance Law
Michael E. Toner, Speaker
George Washington University Graduate School of Political Management
November 19, 2015 | Washington, DC