



1411 K Street, NW, Suite 1400 · Washington, DC 20005
tel (202) 736-2200 · fax (202) 736-2222
www.campaignlegalcenter.org

April 12, 2017

Submitted via U.S. Mail

Honorable Xavier Becerra
California Attorney General
1300 I Street
Sacramento, CA

Honorable Alex Padilla
California Secretary of State
1500 11th Street
Sacramento, CA 95814

RE: Glittering Steel LLC's Alleged Violations of the California Corporations Code

Dear Mr. Becerra and Mr. Padilla:

We write to bring to your attention potential violations of the California Corporations Code by Glittering Steel LLC, which is chaired by Stephen Bannon.

Glittering Steel LLC is registered in Delaware as a Limited Liability Corporation, and has engaged in a pattern of intrastate commerce in California, but has not registered with the California Secretary of State and provided the public disclosures required under state law.

A limited liability corporation incorporated outside of California may not transact intrastate business in California without first having registered with the California Secretary of State and obtained a certificate of qualification.¹ California Corporations Code defines “transacting intrastate” as entering into repeated and successive transactions of its business in California (other than interstate or foreign commerce).²

According to filings with the Federal Election Commission, an independent expenditure-only political action committee (“super PAC”) called Make America Number 1 reported making dozens of payments to Glittering Steel LLC throughout 2015 and 2016 at a California address,

¹ Cal. Corp. Code §§ 2105, 17708.02.

² Cal. Corp. Code §§ 191, 17708.03.

8383 Wilshire Blvd. Suite 1000 in Beverly Hills.³ These payments amounted to millions of dollars.⁴

According to Bannon's Executive Branch Personnel Public Financial Disclosure Report, filed with the White House on March 31, 2017, Glittering Steel LLC also made monthly payments to another California-based entity, Bannon Strategic Advisors, Inc. which was registered with the California Secretary of State at that same address, 8383 Wilshire Blvd. Suite 1000.⁵

Bannon reported on that financial disclosure form that he was Chairman of Glittering Steel LLC until resigning on August 16, 2016, and that he earned \$167,500 over the previous calendar year from Glittering Steel LLC for "consulting and director fees," paid via a monthly fee into the California-based Bannon Strategic Advisors, Inc., and "into Mr. Bannon's respective corporations."⁶

According to these reports, filed with federal agencies under penalty of perjury, Glittering Steel LLC engaged in intrastate commerce within the meaning of the statute by receiving dozens of payments in 2015 and 2016 at a California address, and making monthly payments to another California firm, Bannon Strategic Advisors, Inc.⁷ Yet, Glittering Steel did not register as a foreign corporation with the California Secretary of State, and did not publicly disclose the names and addresses of its managers and members, as required by California law.

This evidence also makes clear that Glittering Steel LLC has been "doing business" in California within the meaning of Cal. Rev. & Tax Code Sec. 23101, and is thus required to file a California

³ See Make America Number 1, Independent Expenditures to Glittering Steel LLC, FED. ELEC. COMM, https://beta.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00575373&is_notice=false&payee_name=glittering+steel&min_date=01%2F01%2F2015&max_date=08%2F01%2F2016; Make America Number 1, Disbursements to Glittering Steel LLC, FED. ELEC. COMM., https://beta.fec.gov/data/disbursements/?two_year_transaction_period=2016&data_type=processed&committee_id=C00575373&recipient_name=GLITTERING+STEEL+LLC&min_date=01%2F01%2F2015&max_date=12%2F31%2F2016.

⁴ *Id.*

⁵ See Bannon Strategic Advisors, Inc., Statement of Information (Jun. 30, 2016), attached as Exhibit A. The company filed paperwork changing its address on October 6, the same day the Campaign Legal Center filed a complaint with the FEC alleging Make America Number 1's disbursements to Glittering Steel may have constituted illegal compensation to Bannon for his work on Donald Trump's presidential campaign. See Bannon Strategic Advisors, Inc., Statement of Information (Oct. 6, 2016), attached as Exhibit B.

⁶ See Stephen Bannon, Executive Branch Personnel Public Financial Disclosure Report OGE Form 278e (Mar. 31, 2017), attached as Exhibit C. Bannon's financial report, however, describes Glittering Steel LLC as located at a UPS store in Arlington, Virginia.

⁷ Additionally, Make America Number 1's stated purpose for paying Glittering Steel LLC was to fund "video production." See supra note 3. If Glittering Steel produced those videos in California (where it received payment) it would presumably have also engaged in intrastate commerce in California. Glittering Steel LLC's IMDB page shows that it has produced at least two full-length films, Clinton Cash (2016) and Torchbearer (2016); it is not known whether these films were created in whole or in part in California.

tax return and is subject to certain taxes and fees.⁸ The millions in payments Glittering Steel LLC received from Make America Number 1 at a California address indicate that it was actively engaged in transactions in California for the purpose of profit,⁹ and that it was commercially domiciled in the state,¹⁰ and that its “sales” exceeded statutory thresholds;¹¹ and the reported six-figures in compensation paid from Glittering Steel LLC to Bannon via his California-based consulting firm also shows that Glittering Steel LLC exceeded the statute’s \$50,000 threshold for paying compensation to satisfy the definition of “doing business” in the state.¹² As such, Glittering Steel LLC is subject to the California return filing requirement and relevant taxes.

Published reports indicate a pattern of questionable reporting practices. For example, Bannon owns a house and a condo in California, and has a driver’s license and checking account in the state, and yet reportedly declared residency in Florida “to take advantage of the state’s lack of state income taxes.”¹³

Additionally, Bannon’s federal financial disclosure suggests there may be other inconsistencies associated with Bannon-tied corporations that did register in California. Bannon’s financial disclosure report states that until August 2016 he was the Executive Chairman of Breitbart News Network LLC, which is registered with the California Secretary of State as a foreign corporation.¹⁴ However, Breitbart News Network LLC’s “Statement of Information” filed with California on January 7, 2016 does not include Bannon’s name, neither as Chief Executive Officer nor as a manager or member (although it does list the same address as Bannon’s consulting firm, 8383 Wilshire Blvd. Suite 100); the only manager/member listed is Laurence Solov.¹⁵ Breitbart News Network LLC’s amended Statement of Information, filed November 18, 2016, also does not include Bannon’s name—but replaces Solov’s name with that of Andrew Breitbart, who died in 2012.¹⁶

⁸ The obligation to file a return and be subject to applicable taxes and fees as a result of “doing business” in California under Cal. Rev. & Tax Code § 23101 is distinct from the obligation to register with the Secretary of State as a result of “transacting intrastate business” under Cal. Corp. Code §§ 2105 and 17708.02. *See* Cal. Franchise Tax Bd., Legal Ruling 2014-01 (Jul. 22, 2014), fn. 7.

⁹ Cal. Rev. & Tax Code § 23101(a).

¹⁰ *Id.* § 23101(b)(1).

¹¹ *Id.* § 23101(b)(2).

¹² *Id.* § 23101(b)(3).

¹³ Robert O’Harrow Jr. and Shawn Boburg, *During His Political Rise, Stephen K. Bannon Was a Man With No Fixed Address*, WASH. POST (Mar. 11, 2017), https://www.washingtonpost.com/investigations/during-his-political-rise-stephen-k-bannon-was-a-man-with-no-fixed-address/2017/03/11/89866f4c-0285-11e7-ad5b-d22680e18d10_story.html?utm_term=.4af2ab62ff73; *see also* Shawn Boburg and Robert O’Harrow Jr., *How Bannon’s Multimedia Machine Drove a Movement and Paid Him Millions*, WASH. POST (Apr. 9, 2017), https://www.washingtonpost.com/investigations/how-bannons-multimedia-machine-drove-a-movement-and-paid-him-millions/2017/04/09/203df1ce-197b-11e7-855e-4824bbb5d748_story.html?hpid=hp_rhp-top-table-main_bannonmachine-615pm-1%3Ahomepage%2Fstory&utm_term=.1a9746a130c0.

¹⁴ *See* Exhibit C (Bannon OGE Form 278e).

¹⁵ Breitbart News Network LLC, Statement of Information (Jan. 07, 2016), attached as Exhibit D.

¹⁶ Breitbart News Network LLC, Statement of Information (Nov. 18, 2016), attached as Exhibit E.

We request that your offices investigate these matters, require Glittering Steel LLC to register with the California Secretary of State and publicly disclose information about its board membership, and assess any appropriate penalties.¹⁷

Respectfully submitted,



Lawrence M. Noble
Senior Director, Regulatory Programs
General Counsel,
Campaign Legal Center



Brendan Fischer
Director, Federal and FEC Reform Program
Campaign Legal Center

¹⁷ Cal. Corp. Code § 17708.9 also provides that the Attorney General may maintain an action to enjoin a foreign limited liability company from transacting intrastate business in California.

Exhibit A



State of California Secretary of State

S

Statement of Information

(Domestic Stock and Agricultural Cooperative Corporations)

FEES (Filing and Disclosure): \$25.00.

If this is an amendment, see instructions.

IMPORTANT – READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

1. CORPORATE NAME

2. CALIFORNIA CORPORATE NUMBER

This Space for Filing Use Only

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

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

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

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

4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE CITY STATE ZIP CODE

5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY CITY STATE ZIP CODE

6. MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 4 CITY STATE ZIP CODE

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

7. CHIEF EXECUTIVE OFFICER/ ADDRESS CITY STATE ZIP CODE

8. SECRETARY ADDRESS CITY STATE ZIP CODE

9. CHIEF FINANCIAL OFFICER/ ADDRESS CITY STATE ZIP CODE

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

10. NAME ADDRESS CITY STATE ZIP CODE

11. NAME ADDRESS CITY STATE ZIP CODE

12. NAME ADDRESS CITY STATE ZIP CODE

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

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

14. NAME OF AGENT FOR SERVICE OF PROCESS

15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL CITY STATE ZIP CODE

Type of Business

16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION

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

DATE TYPE/PRINT NAME OF PERSON COMPLETING FORM TITLE SIGNATURE

Exhibit B



State of California Secretary of State

S

118

Statement of Information

(Domestic Stock and Agricultural Cooperative Corporations)

FEES (Filing and Disclosure): \$25.00.

If this is an amendment, see instructions.

Jan

16-632514

FILED Secretary of State State of California

OCT 06 2016

IMPORTANT - READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

1. CORPORATE NAME Bannan Strategic Advisors, Inc.

2. CALIFORNIA CORPORATE NUMBER C2752795

1/NF/PC

This Space for Filing Use Only

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

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

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

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

Table with 4 columns: Item number, Street Address, City, State, ZIP Code. Rows include Principal Executive Office, Principal Business Office, and Mailing Address.

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

Table with 5 columns: Item number, Title, Name, Address, City, State, ZIP Code. Rows include Chief Executive Officer, Secretary, and Chief Financial Officer.

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

Table with 5 columns: Item number, Name, Address, City, State, ZIP Code. Row includes Stephen K Bannon.

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

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 15 must be completed with a California street address, a P.O. Box address is not acceptable.

14. NAME OF AGENT FOR SERVICE OF PROCESS eResidentAgent, Inc.

(27702877)

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

Type of Business

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

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

10/05/2016 Erika Easter Authorized Person DATE TYPE/PRINT NAME OF PERSON COMPLETING FORM TITLE SIGNATURE

[Signature]

Exhibit C

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

Filer's Information

Bannon, Steve

Assistant to the President and Chief Strategist, White House

Date of Appointment: 11/13/2016

Other Federal Government Positions Held During the Preceding 12 Months:

None

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

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

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

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

Other review conducted by

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

U.S. Office of Government Ethics Certification

Data Revised 03/31/2017

1. Filer's Positions Held Outside United States Government

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

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

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

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

3. Filer's Employment Agreements and Arrangements

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

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

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

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

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

None

6. Other Assets and Income

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

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

7. Transactions

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

8. Liabilities

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

9. Gifts and Travel Reimbursements

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

Endnotes

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

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

Summary of Contents

1. Filer's Positions Held Outside United States Government

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

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

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

Part 2 discloses the following:

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

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

3. Filer's Employment Agreements and Arrangements

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

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

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

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

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

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

Part 5 discloses the following:

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

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

6. Other Assets and Income

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

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

7. Transactions

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

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

8. Liabilities

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

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

9. Gifts and Travel Reimbursements

This section discloses:

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

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

Privacy Act Statement

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

Public Burden Information

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

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

Exhibit D



State of California Secretary of State

19

L

STATEMENT OF INFORMATION (Limited Liability Company)

Jim

Filing Fee \$20.00. If this is an amendment, see instructions.

IMPORTANT - READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

FILED Secretary of State State of California JAN 07 2016

1/17/16

This Space For Filing Use Only

File Number and State or Place of Organization

2. SECRETARY OF STATE FILE NUMBER 201122210229

3. STATE OR PLACE OF ORGANIZATION (If formed outside of California) DE

No Change Statement

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

If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to Item 15.

Complete Addresses for the Following (Do not abbreviate the name of the city. Items 5 and 7 cannot be P.O. Boxes.)

Table with 4 columns: Item Number, Address, City, State, ZIP Code. Rows 5-7.

Name and Complete Address of the Chief Executive Officer, if Any

Table with 5 columns: Item Number, Name, Address, City, State, ZIP Code. Row 8.

Name and Complete Address of Any Manager or Managers, or if None Have Been Appointed or Elected, Provide the Name and Address of Each Member (Attach additional pages, if necessary.)

Table with 5 columns: Item Number, Name, Address, City, State, ZIP Code. Rows 9-11.

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 13 must be completed with a California address, a P.O. Box is not acceptable. If the agent is a corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 13 must be left blank.

Table with 5 columns: Item Number, Name of Agent, Address, City, State, ZIP Code. Rows 12-13.

Type of Business

14. DESCRIBE THE TYPE OF BUSINESS OF THE LIMITED LIABILITY COMPANY

Informational website

15. THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

01/07/2016 DATE

Erika Easter TYPE OR PRINT NAME OF PERSON COMPLETING THE FORM

Authorized Person TITLE

SIGNATURE

Exhibit E



**Attachment to
Statement of Information
(Limited Liability Company)**

**LLC-12A
Attachment**

A. Limited Liability Company Name
Breitbart News Network, LLC

This Space For Office Use Only

B. 12-Digit Secretary of State File Number
201122210229

C. State or Place of Organization (only if formed outside of California)
DE

D. List of Additional Manager(s) or Member(s) - If the manager/member is an individual, enter the individual's name and address. If the manager/member is an entity, enter the entity's name and address. Note: The LLC cannot serve as its own manager or member.

2a. First Name – Do not complete Item 2b Laurence	Middle Name G.	Last Name Solov	Suffix
2b. Entity Name – Do not complete Item 2a			
2c. Address 149 S. Barrington Ave. #735	City (no abbreviations) Los Angeles	State CA	Zip Code 90049
3a. First Name – Do not complete Item 3b	Middle Name	Last Name	Suffix
3b. Entity Name – Do not complete Item 3a			
3c. Address	City (no abbreviations)	State	Zip Code
4a. First Name – Do not complete Item 4b	Middle Name	Last Name	Suffix
4b. Entity Name – Do not complete Item 4a			
4c. Address	City (no abbreviations)	State	Zip Code
5a. First Name – Do not complete Item 5b	Middle Name	Last Name	Suffix
5b. Entity Name – Do not complete Item 5a			
5c. Address	City (no abbreviations)	State	Zip Code
6a. First Name – Do not complete Item 6b	Middle Name	Last Name	Suffix
6b. Entity Name – Do not complete Item 6a			
6c. Address	City (no abbreviations)	State	Zip Code
7a. First Name – Do not complete Item 7b	Middle Name	Last Name	Suffix
7b. Entity Name – Do not complete Item 7a			
7c. Address	City (no abbreviations)	State	Zip Code
8a. First Name – Do not complete Item 8b	Middle Name	Last Name	Suffix
8b. Entity Name – Do not complete Item 8a			
8c. Address	City (no abbreviations)	State	Zip Code

2 of 2 added
12-13-2016
4