

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - t

NAME OF COMMITTEE (In Full)
Majority Forward

FEC IDENTIFICATION NUMBER
C90016098

Mailing Address 700 13th Street NW
Suite 600

City State ZIP Code
Washington DC 20005

July 31, 2019

Vicki Davis
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
1050 First Street, N.E.
Washington, DC 20002

Re: Majority Forward
FEC Identification # C90016098

Dear Ms. Davis:

The purpose of this supplemental response is to respond to your questions regarding the 2018 Year-End Report of Majority Forward, the above referenced organization (the "Organization").

1. You asked about the fact that no contributions were disclosed on Line 6, "Total Contributions." On October 4, 2018, the Federal Election Commission (the "Commission") issued guidance regarding filing obligations of organizations that make independent expenditures pursuant to CREW v. FEC, 316 F. Supp. 3d 349, 389 (D.D.C. 2018). The Commission noted that reports due after September 18, 2018 must include the identification of each person other than a political committee "who made a contribution or contributions" in an aggregate amount in excess of \$200. The term "contribution" is a defined one by statute and as interpreted by the courts. The Commission noted that the court in CREW v. FEC required the "disclosure of donors of over \$200 annually making contributions earmarked for political purposes," and that category included but was not limited to donors who contribute "for the purpose of furthering an independent expenditure." The court in CREW v. FEC made clear that the phrase "earmarked for political purposes" applies only to funds earmarked for political purposes "in connection with a federal election" or "to influence any election for federal elections." (See CREW, 316 F. Supp. 3d at 372, 395).

The Organization did not accept any contributions that are earmarked for federal political purposes, including, but not limited to, the making of independent expenditures. Therefore, the Organization has received no contributions as defined by CREW v. FEC or by the Commissions' subsequent policy guidance. As a result, the Organization has no donors to report on Form 5.

2. You also ask about an independent expenditure to Waterfront Strategies. Due to a typographical error, the date of dissemination was reported as 11/2/18 instead of 11/5/18. Because the correct dissemination date was 11/5/18, no 24 hour notice was required. The Organization will amend its report to address the matter.

Please let us know if you require any additional information.

Sincerely yours,

Rachel Jacobs
Counsel