

**FEC  
FORM 3X**

**REPORT OF RECEIPTS  
AND DISBURSEMENTS**  
For Other Than An Authorized Committee

RECEIVED  
FEC MAIL CENTER  
2020 JUL -2 AM 9:37

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

RYMAN HOSPITALITY PROPERTIES PAC

ADDRESS (number and street) ONE GAYLORD DRIVE

Check if different than previously reported. (ACC) NASHVILLE TN 37214

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C00183707

3. IS THIS REPORT  NEW (N) OR  AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

July 31 Mid-Year Report (Non-election Year Only) (MY)

Termination Report (TER)

(b) Monthly Report Due On:

Feb 20 (M2)  May 20 (M5)  Aug 20 (M8)  Nov 20 (M11) (Non-Election Year Only)

Mar 20 (M3)  Jun 20 (M6)  Sep 20 (M9)  Dec 20 (M12) (Non-Election Year Only)

Apr 20 (M4)  Jul 20 (M7)  Oct 20 (M10)  Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

Primary (12P)  General (12G)  Runoff (12R)

Convention (12C)  Special (12S)

Election on \_\_\_\_\_ in the State of \_\_\_\_\_

(d) 30-Day POST-Election Report for the:

General (30G)  Runoff (30R)  Special (30S)

Election on \_\_\_\_\_ in the State of \_\_\_\_\_

5. Covering Period 04 / 01 / 2020 through 06 / 30 / 2020

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer JENNIFER HUTCHESON

Signature of Treasurer Jennifer Hutcherson Date 07 / 01 / 2020

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

ORIGINAL FILED IN 2020-07-02

**SUMMARY PAGE  
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

**RYMAN HOSPITALITY PROPERTIES PAC**

Report Covering the Period: From:

**04 / 01 / 2020**

To:

**06 / 30 / 2020**

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, <b>2020</b>		<b>3181639</b>
(b) Cash on Hand at Beginning of Reporting Period.....	<b>3236142</b>	
(c) Total Receipts (from Line 19) .....	<b>315679</b>	<b>529308</b>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) .....	<b>3551821</b>	<b>3710947</b>
7. Total Disbursements (from Line 31) .....	<b>17488</b>	<b>176614</b>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) .....	<b>3534333</b>	<b>3534333</b>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) .....	<b>000</b>	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) .....	<b>000</b>	



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

**For further information contact:**

Federal Election Commission  
1050 First Street, N.E.  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100

**DETAILED SUMMARY PAGE**  
of Receipts

FEC Form 3X (Rev. 05/2016)

Page 3

Write or Type Committee Name

**RYMAN HOSPITALITY PROPERTIES PAC**

Report Covering the Period: From:

MM / DD / YYYY  
04 / 01 / 2020

To:

MM / DD / YYYY  
06 / 30 / 2020

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees:		
(i) Itemized (use Schedule A).....	2787.86	3985.74
(ii) Unitemized.....	362.40	1260.00
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	3150.26	5245.74
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	3150.26	5245.74
12. Transfers From Affiliated/Other Party Committees.....	0.00	0.00
13. All Loans Received.....	0.00	0.00
14. Loan Repayments Received.....	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	653	4734
18. Transfers from Non-Federal and Levin Funds:		
(a) Non-Federal Account (from Schedule H3).....	0.00	0.00
(b) Levin Funds (from Schedule H5).....	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))..	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	3156.79	5293.08
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	3156.79	5293.08

**DETAILED SUMMARY PAGE**  
of Disbursements

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share .....	0.00	0.00
(ii) Non-Federal Share .....	0.00	0.00
(b) Other Federal Operating Expenditures .....	0.00	0.00
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) .....	0.00	0.00
22. Transfers to Affiliated/Other Party Committees .....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees .....	0.00	1,500.00
24. Independent Expenditures (use Schedule E) .....	0.00	0.00
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F) .....	0.00	0.00
26. Loan Repayments Made .....	0.00	0.00
27. Loans Made .....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees .....	0.00	0.00
(b) Political Party Committees .....	0.00	0.00
(c) Other Political Committees (such as PACs) .....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)) .....	0.00	0.00
29. Other Disbursements (Including Non-Federal Donations) .....	174.88	266.14
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share .....	0.00	0.00
(ii) "Levin" Share .....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds .....	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)) .....	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	174.88	1766.14
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31) .....	174.88	1766.14

**DETAILED SUMMARY PAGE**  
of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3) .....	31,502.6	52,457.4
34. Total Contribution Refunds (from Line 28(d)) .....	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33) .....	31,502.6	52,457.4
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)) .....	0.00	0.00
37. Offsets to Operating Expenditures (from Line 15, page 3) .....	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36) .....	0.00	0.00

DISBURSEMENTS TO BE REPORTED

**SCHEDULE A (FEC Form 3X)**  
**ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE <b>6</b> OF <b>10</b>
	<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
	<input type="checkbox"/> 13	<input type="checkbox"/> 14
	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
	<input type="checkbox"/> 15	<input type="checkbox"/> 16
	<input type="checkbox"/> 17	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)  
**RYMAN HOSPITALITY PROPERTIES PAC**

A. Full Name of Individual (Last, First, Middle Initial) or Full Organization Name  
**REED, COLIN**

Mailing Address  
**ONE GAYLORD DRIVE**

City  
**NASHVILLE** State  
**TN** Zip Code  
**37214**

FEC ID number of contributing federal political committee.  
**IC**

Name of Employer (for Individual)  
**RYMAN HOSPITALITY PROPERTIES** Occupation (for Individual)  
**CHAIRMAN & CEO**

Receipt For:  
 Primary  General  
 Other (specify)  Aggregate Year-to-Date **1923.00**

Date of Receipt  
**06 / 30 / 2020**

Amount of Each Receipt this Period  
**1153.80**

Memo Item

B. Full Name of Individual (Last, First, Middle Initial) or Full Organization Name  
**FIDRANTZI, MARK**

Mailing Address  
**ONE GAYLORD DRIVE**

City  
**NASHVILLE** State  
**TN** Zip Code  
**37214**

FEC ID number of contributing federal political committee.  
**IC**

Name of Employer (for Individual)  
**RYMAN HOSPITALITY PROP.** Occupation (for Individual)  
**PRESIDENT & CFO**

Receipt For:  
 Primary  General  
 Other (specify)  Aggregate Year-to-Date **384.60**

Date of Receipt  
**06 / 30 / 2020**

Amount of Each Receipt this Period  
**230.76**

Memo Item

C. Full Name of Individual (Last, First, Middle Initial) or Full Organization Name  
**CHERRY, SIDNEY**

Mailing Address  
**ONE GAYLORD DRIVE**

City  
**NASHVILLE** State  
**TN** Zip Code  
**37214**

FEC ID number of contributing federal political committee.  
**IC**

Name of Employer (for Individual)  
**RYMAN HOSPITALITY PROPERTIES** Occupation (for Individual)  
**VP, TAX**

Receipt For:  
 Primary  General  
 Other (specify)  Aggregate Year-to-Date **373.10**

Date of Receipt  
**06 / 30 / 2020**

Amount of Each Receipt this Period  
**223.86**

Memo Item

SUBTOTAL of Receipts This Page (optional).....▶ **1608.42**

TOTAL This Period (last page this line number only).....▶ **1608.42**

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)		PAGE 7 OF 10					
	<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16

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NAME OF COMMITTEE (In Full)  
**RYMAN HOSPITALITY PROPERTIES PAC**

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name  
**A. CHAMBLIN, JAMES**

Date of Receipt  
**06 / 30 / 2020**

Mailing Address  
**ONE GAYLORD DRIVE**

City  
**NASHVILLE** State  
**TN** Zip Code  
**37214**

FEC ID number of contributing federal political committee.  
**C**

Name of Employer (for Individual)  
**RYMAN HOSPITALITY PROP.** Occupation (for Individual)  
**SVP, DESIGN & CONST.**

Receipt For:  
 Primary  General  
 Other (specify) ▼

Aggregate Year-to-Date ▼  
**314.00**

Amount of Each Receipt this Period  
**18840**

Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name  
**B. SMITH, LAUREN**

Date of Receipt  
**06 / 30 / 2020**

Mailing Address  
**ONE GAYLORD DRIVE**

City  
**NASHVILLE** State  
**TN** Zip Code  
**37214**

FEC ID number of contributing federal political committee.  
**C**

Name of Employer (for Individual)  
**RYMAN HOSPITALITY PROP.** Occupation (for Individual)  
**DIR. OF OPER.**

Receipt For:  
 Primary  General  
 Other (specify) ▼

Aggregate Year-to-Date ▼  
**254.56**

Amount of Each Receipt this Period  
**15320**

Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name  
**C. BAILEY, SCOTT**

Date of Receipt  
**06 / 30 / 2020**

Mailing Address  
**ONE GAYLORD DRIVE**

City  
**NASHVILLE** State  
**TN** Zip Code  
**37214**

FEC ID number of contributing federal political committee.  
**C**

Name of Employer (for Individual)  
**RYMAN HOSPITALITY PROP.** Occupation (for Individual)  
**PRESIDENT, OPRY ENT.**

Receipt For:  
 Primary  General  
 Other (specify) ▼

Aggregate Year-to-Date ▼  
**200.00**

Amount of Each Receipt this Period  
**12000**

Memo Item

**SUBTOTAL** of Receipts This Page (optional).....▶ **46160**

**TOTAL** This Period (last page this line number only).....▶

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)		PAGE 8 OF 10	
	<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
				<input type="checkbox"/> 17

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NAME OF COMMITTEE (In Full)  
**RYMAN HOSPITALITY PROPERTIES PAC**

A. Full Name of Individual (Last, First, Middle Initial) or Full Organization Name  
**CHAFFIN, PATRICK**

Mailing Address  
**ONE GAYLORD DRIVE**

City **NASHVILLE** State **TN** Zip Code **37214**

FEC ID number of contributing federal political committee. **C**

Name of Employer (for Individual) **RYMAN HOSPITALITY PROP.** Occupation (for Individual) **EVP & COO**

Receipt For:  
 Primary  General  
 Other (specify) ▼

Aggregate Year-to-Date ▼ **20000**

Date of Receipt  
**06 / 30 / 2020**

Amount of Each Receipt this Period  
**12000**

Memo Item

B. Full Name of Individual (Last, First, Middle Initial) or Full Organization Name  
**GRIMES, RON**

Mailing Address  
**ONE GAYLORD DRIVE**

City **NASHVILLE** State **TN** Zip Code **37214**

FEC ID number of contributing federal political committee. **C**

Name of Employer (for Individual) **RYMAN HOSPITALITY PROP.** Occupation (for Individual) **DIR. OF SECURITY**

Receipt For:  
 Primary  General  
 Other (specify) ▼

Aggregate Year-to-Date ▼ **20000**

Date of Receipt  
**06 / 30 / 2020**

Amount of Each Receipt this Period  
**12000**

Memo Item

C. Full Name of Individual (Last, First, Middle Initial) or Full Organization Name  
**HUTCHESON, JENNIFER**

Mailing Address  
**ONE GAYLORD DRIVE**

City **NASHVILLE** State **TN** Zip Code **37214**

FEC ID number of contributing federal political committee. **C**

Name of Employer (for Individual) **RYMAN HOSPITALITY PROP.** Occupation (for Individual) **EVP & CAO**

Receipt For:  
 Primary  General  
 Other (specify) ▼

Aggregate Year-to-Date ▼ **20000**

Date of Receipt  
**06 / 30 / 2020**

Amount of Each Receipt this Period  
**12000**

Memo Item

SUBTOTAL of Receipts This Page (optional).....▶ **36000**

TOTAL This Period (last page this line number only).....▶



**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 9 OF 10
	<input checked="" type="checkbox"/> 11a 13	<input type="checkbox"/> 11b 14
	<input type="checkbox"/> 11c 15	<input type="checkbox"/> 12 16
		<input type="checkbox"/> 17

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NAME OF COMMITTEE (In Full)  
**RYMAN HOSPITALITY PROPERTIES PAC**

A. Full Name of Individual (Last, First, Middle Initial) or Full Organization Name  
**LYNN SCOTT**

Mailing Address  
**ONE GAYLORD DRIVE**

City  
**NASHVILLE** State  
**TN** Zip Code  
**37214**

FEC ID number of contributing federal political committee.  
**C**

Name of Employer (for Individual)  
**RYMAN HOSPITALITY PROP.** Occupation (for Individual)  
**EVP & GC**

Receipt For:  
 Primary  General  
 Other (specify) ▼

Aggregate Year-to-Date ▼  
**200.00**

Date of Receipt  
**06 / 30 / 2020**

Amount of Each Receipt this Period  
**120.00**

Memo Item

B. Full Name of Individual (Last, First, Middle Initial) or Full Organization Name  
**WEIEN, PETER**

Mailing Address  
**ONE GAYLORD DRIVE**

City  
**NASHVILLE** State  
**TN** Zip Code  
**37214**

FEC ID number of contributing federal political committee.  
**C**

Name of Employer (for Individual)  
**RYMAN HOSPITALITY PROP.** Occupation (for Individual)  
**SVP, OPERATIONS**

Receipt For:  
 Primary  General  
 Other (specify) ▼

Aggregate Year-to-Date ▼  
**200.00**

Date of Receipt  
**06 / 30 / 2020**

Amount of Each Receipt this Period  
**120.00**

Memo Item

C. Full Name of Individual (Last, First, Middle Initial) or Full Organization Name  
**NAPIER, CRAIG**

Mailing Address  
**ONE GAYLORD DRIVE**

City  
**NASHVILLE** State  
**TN** Zip Code  
**37214**

FEC ID number of contributing federal political committee.  
**C**

Name of Employer (for Individual)  
**RYMAN HOSPITALITY PROP.** Occupation (for Individual)  
**VP, ACCT. COMPLIANCE**

Receipt For:  
 Primary  General  
 Other (specify)

Aggregate Year-to-Date ▼  
**194.72**

Date of Receipt  
**06 / 30 / 2020**

Amount of Each Receipt this Period  
**117.84**

Memo Item

SUBTOTAL of Receipts This Page (optional).....▶ **357.84**

TOTAL This Period (last page this line number only).....▶ **2787.86**

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER:  
(check only one)

PAGE 10 OF 10

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 26	<input type="checkbox"/> 27
<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

**RYMAN HOSPITALITY PROPERTIES PAC**

Full Name (Last, First, Middle Initial)

**A. BANK OF AMERICA**

Mailing Address

**2720 LEBANON PIKE**

City

**NASHVILLE**

State

**TN**

Zip Code

**37214**

Purpose of Disbursement

**BANK FEES**

Candidate Name

**023**

Category/  
Type

Date of Disbursement

**06 / 30 / 2020**

FEC Identification Number

**C**

Amount of Each Disbursement this Period

**17488**

Memo Item

Office Sought:

House  
 Senate  
 President

Disbursement For:

Primary  General  
 Other (specify) ▼

State:

District:

Full Name (Last, First, Middle Initial)

**B.**

Mailing Address

City

State

Zip Code

Purpose of Disbursement

Candidate Name

Category/  
Type

Date of Disbursement

FEC Identification Number

**C**

Amount of Each Disbursement this Period

Memo Item

Office Sought:

House  
 Senate  
 President

Disbursement For:

Primary  General  
 Other (specify) ▼

State:

District:

Full Name (Last, First, Middle Initial)

**C.**

Mailing Address

City

State

Zip Code

Purpose of Disbursement

Candidate Name

Category/  
Type

Date of Disbursement

FEC Identification Number

**C**

Amount of Each Disbursement this Period

Memo Item

Office Sought:

House  
 Senate  
 President

Disbursement For:

Primary  General  
 Other (specify) ▼

State:

District:

SUBTOTAL of Disbursements This Page (optional).....▶

**17488**

TOTAL This Period (last page this line number only).....▶

**17488**

Insert shipping document here

ORIGIN ID:BNAA (615) 316-6137  
CAROLINE JONES  
RYMAN HOSPITALITY PROPERTIES, INC.  
ONE GAYLORD DRIVE

SHIP DATE: 01JUL20  
ACTWGT: 1.00 LB  
CAD: 1185386/NET4220

NASHVILLE TN 37214  
UNITED STATES US

BILL SENDER

TO PAC FILING DEPARTMENT  
FEDERAL ELECTION COMMISSION

~~██████████~~ NW

1050 -  
FIRST

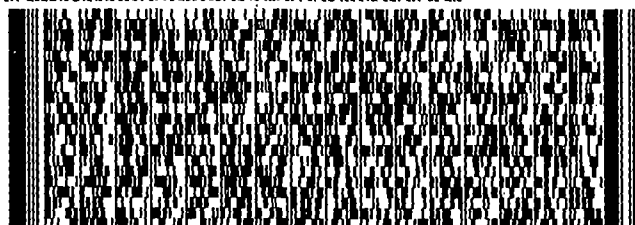
U S GOVERNMENT OFFIC DC 20463

(800) 424-9530  
INV:  
PO:

REF: 3105-1002-191801-654001

DEPT:

FedEx Ship Manager - Print Your Label(s)



FedEx  
Express



201120044010

THU - 02 JUL 3:00P

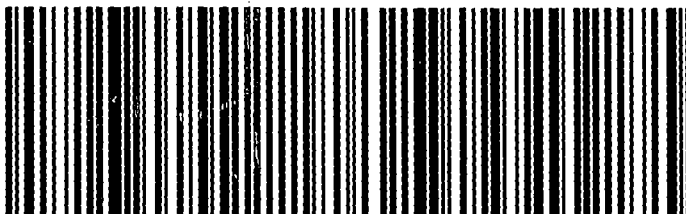
STANDARD OVERNIGHT

TRK# 7708 5113 5500  
0201

XC RDVA

20463

DC-US IAD



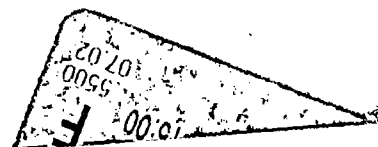
Extremely Urgent

7/1/2020

Express



FedEx



Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**  
 The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Date of Receipt
Postmarked	
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
<input type="checkbox"/> USPS Priority Mail Express	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <i>Fed Ex</i>	Shipping Date
	<i>7/11/20</i>
	Next Business Day Delivery <input checked="" type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

PREPARER *SPM*

*7/6/20*  
DATE PREPARED

FBI/DOJ - CIVIL RIGHTS DIVISION