1 2 3 4 5 6	Gautam Dutta, Esq. (State Bar No. 199326) BUSINESS, ENERGY, AND ELECTION L 5655 Silver Creek Valley Rd # 900 San Jose, CA 95138 Telephone: 415.236.2048; Fax: 213.405.24 Email: Dutta@BusinessandElectionLaw.cor Attorneys for Plaintiff MIKE HONDA FOR CONGRESS	16
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8	UNITED STATE	ES DISTRICT COURT
9	NORTHERN DIST	TRICT OF CALIFORNIA
10	SAN JO	SE DIVISION
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12	MIKE HONDA FOR CONGRESS,	Case Number:
13 14	an unincorporated political association, Plaintiff,	COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES FOR:
15	VS.	1. Violation of the Computer Fraud and
16	BRIAN PARVIZSHAHI, an individual,	Abuse Act (18 U.S.C. §1030(a))
17	RO FOR CONGRESS, INC.,	2. Violation of the Computer Fraud and Abuse Act (18 U.S.C. §1030(b))
18	a California corporation,	3. Violation of the Economic Espionage Act
19	ROHIT "RO" KHANNA, an individual,	(18 U.S.C. §§ 1832, et seq.)
20	and DOES 1 through 10,	
21	Defendants.	JURY TRIAL DEMANDED
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		COMPLAINT FOR INHINCTIVE RELIEF AND

DAMAGES

INTRODUCTION

- 1. Mike Honda for Congress files this Complaint against Defendants Brian Parvizshahi, Ro for Congress, Inc., and Rohit "Ro" Khanna, for they illegally obtained and used confidential, proprietary information belonging to Mike Honda for Congress. As a result of their wrongdoing, the privacy of *thousands* of supporters of Congressmember Honda was violated. Furthermore, they were personally pressured and intimidated by Defendant Khanna at a place that they had least expected: their own email inbox.
- 2. By illegally obtaining and using Mike Honda for Congress' confidential, proprietary information, Defendants violated the Computer Fraud and Abuse Act (18 U.S.C. §1030) and the Economic Espionage Act (18 U.S.C. §\$1832, et seq.).
- 3. Mike Honda for Congress seeks, *inter alia*, to stop Defendants from continuing to illegally use Mike Honda for Congress' confidential and proprietary information, as well as to obtain legal redress for the harm that has been inflicted upon Mike Honda for Congress and its supporters.

PARTIES

- 4. Plaintiff **Mike Honda for Congress** is an unincorporated political association with its principal place of business in Santa Clara County, California.
- 5. Upon information and belief, Defendant **Brian Parvizshahi** works from a place of business located in Santa Clara County, California.
- Defendant Ro for Congress, Inc., a California corporation that was incorporated in 2011, conducts business from and maintains an office in Santa Clara County, California.
- 7. Upon information and belief, Defendant **Rohit "Ro" Khanna** is a resident of Alameda County, and works from a place of business located in Santa Clara County.

JURISDICTION AND VENUE

8. This action arises under 18 U.S.C. §1030 and 18 U.S.C. §§1832, *et seq.* in relation to Defendants' unlawful actions. Accordingly, this Court has federal-question

- jurisdiction under 28 U.S.C. §1331 and 28 U.S.C. §1343.
- 9. All or most of the practices, events, and omissions alleged in this Complaint occurred in Santa Clara County. Accordingly, venue is appropriate for the U.S. District Court for the Northern District of California, San Jose Division, pursuant to 28 U.S.C. §1391(b)-(c).

FACTUAL BACKGROUND

The Race for California's 17th Congressional District

- 10. Congressmember Mike Honda represents California's 17th Congressional District, an area that comprises a core part of Silicon Valley: Cupertino, Sunnyvale, Santa Clara, Milpitas, Newark, and parts of San Jose and Fremont.
- 11. In 2004, Defendant Khanna unsuccessfully ran for the U.S. House of Representatives against the late Congressmember Tom Lantos, who represented San Mateo County and a part of San Francisco County.
- 12. In 2014, Defendant Khanna unsuccessfully challenged Congressmember Honda for his current seat.
- 13. Because they were the top two finishers in California's June 7, 2016 "Top Two" Primary, Congressmember Honda and Defendant Khanna advanced to the Nov. 8, 2016 general election.
- 14. Currently, Defendant Brian Parvizshahi is the Campaign Manager of Defendant Ro for Congress, Inc. (Defendant Khanna's campaign).
- 15. Defendant Parvizshahi joined Defendant Ro for Congress, Inc. as Data Director in January 2014, and became Campaign Manager the following year.

Defendant Parvizshahi's Internship with Mike Honda for Congress' Consultant

- 16. On April 25, 2005, Mike Honda for Congress and Madalene Mielke entered into an agreement (the "Agreement"), whereby Ms. Mielke became the fundraising consultant to Mike Honda for Congress.
- 17. Pursuant to the Agreement (art. VI), Mike Honda for Congress solely or jointly owned

all information (including fundraising and donor information) developed during the
term of the Agreement. All such information was deemed "confidential" and was
required to be held "in absolute confidence".

- 18. Subsequently, Ms. Mielke founded Arum Group, LLC. After Arum Group was incorporated, Ms. Mielke's role as fundraising consultant under the Agreement was transferred to Arum Group. Pursuant to the terms of the Agreement, Arum Group served as fundraising consultant to Mike Honda for Congress until December 2014.
- 19. Alison Woodworth, Arum Group's Finance Associate, hired and supervised interns during the relevant period.
- 20. Ms. Woodworth hired and supervised three or four interns for Summer 2012. One of those interns was Defendant Parvizshahi.
- 21. Defendant Parvizshahi began what was intended to be his summer-long internship at Arum Group in May 2012.
- 22. Like other Arum Group interns, Defendant Parvizshahi was required to sign an Internship Agreement, which contained a non-disclosure agreement (NDA) with respect to Arum Group's confidential, client information.
- 23. In relevant part, the Internship Agreement stated:
 - 1. You agree that you will not in any way discuss information obtained in connection with your position with the Arum Group outside of the Arum Group's clients.
 - 2. You will treat any confidential or non-public information provided to you by the Arum Group as *strictly confidential*. Any dissemination or discussion regarding such confidential information is *prohibited* with anyone outside of the Arum Group, unless permission to disseminate or discuss such information is granted. This confidentiality requirement *shall survive the termination of this agreement*.¹
- 24. Defendant Parvizshahi was given access to some of Arum Group's confidential client information. That information included confidential, proprietary information belonging to Mike Honda for Congress.

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¹ Italics added.

<u>user1@example.com</u> authorizes access to a shared folder (titled "SHARES") to
user2@example.com, user2 would be able to access all files in SHARES from all
devices until that access is withdrawn by user1.

37. Dropbox's "Acceptable Use Policy" prohibits users from "violat[ing] the law in any way" or "even try[ing] to ... violate the privacy or infringe the rights of others." *See* https://www.dropbox.com/privacy#acceptable_use (last visited Sept. 20, 2016).

Sharing Information on Dropbox: "Edited", "Removed", and "Added"

- 38. In a shared Dropbox folder, all authorized users are granted access as "permissioned" (generally, read-only access or full access).
- 39. Any changes to files are recorded on Dropbox as "In <Shared Folder Name>, <user> <action> <filename>."
- 40. There are three main types of "actions" that can be made to a Dropbox file. A file can be "edited", "removed", or "added".
- 41. An "edited" action means that the file had a new (updated) version of itself uploaded to the shared location within the Dropbox account. "Edited" often means that the file was *last* viewed by a user at the time the "edited" action was recorded on Dropbox.
- 42. Notably, just because a file has been edited does not necessarily mean that the *content* of the file has changed. Many files have additional "metadata" stored in them: information keeping track of edits, summary information, view information, and other information relating to the state of a document outside of the content itself.
- 43. Such metadata is therefore much more volatile. For example, changing a Word document from "Print" view to "Draft" view would constitute a change in state and would be saved and recorded on Dropbox *even if* nothing else occurred.
- 44. A file that was "edited" was definitely opened by the Dropbox user. More could have been done to the file; but the "edited" marker indicates, at a bare minimum, that the file was opened.
- 45. A "removed" action means that the file was removed from the shared location within

the Dropbox account.

- 46. An "added" action means that a new file was added to the shared location within the Dropbox account.
- 47. From a forensic standpoint, Dropbox files labeled as "added" are the most interesting, for those files are the ones with which that person making the change spent the most time.
- 48. If a Dropbox file shows an action of "added" and that file had existed *before* the "added" action occurred, it means that the file was (a) removed from the shared location within the Dropbox account, and then (b) was *re*-added (i.e., was moved back) to the shared location within the Dropbox account.
- 49. This scenario most often occurs when someone has *removed* the file to another location (e.g., his or her desktop) and then *moved the file back* to the shared location within the Dropbox account.

Meaning of the "Desktop" Label in "Added" or "Edited" Actions

- 50. When Dropbox shows that a file has been "added" or "edited", a label of "Desktop" or "Website" appears on the same line. That label ("Desktop" or "Website") shows the *source* of the action that was taken.
- 51. If the label is "Desktop", hovering over this label will reveal the alias (nickname) of the computer used to make the edits.
- 52. If more than one alias is seen, it means that (1) more than one computer was used to make the edits, and (2) the user had authorized a number of computers to access both his or her personal Dropbox account and, by extension, any shared folders tied to that account.

Defendant Parvizshahi Accesses Mike Honda for Congress' Confidential, Proprietary Data After Leaving His Internship With Mike Honda for Congress' Consultant

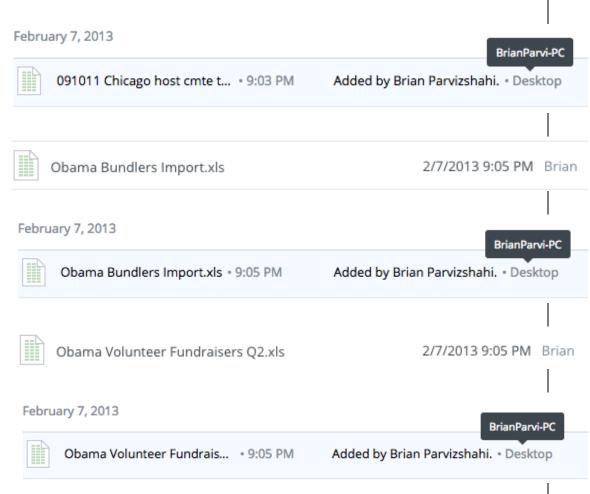
53. After leaving Arum Group, Defendant Parvizshahi continued to access the confidential, proprietary data belonging to Mike Honda for Congress.

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- 54. During the relevant period, Defendant Parvizshahi accessed the Honda Folders from one of two computers: one had the alias of "BrianParvi-PC"; the other had the alias of "BrianParvi".
- 55. Between Feb. 7, 2013 and Sept. 20, 2013, Defendant Parvizshahi "edited", "added", or in some way modified the Honda Folders at least a total of seven times: three times on Feb. 7, 2013, once on Feb. 18, 2013, twice on June 23, 2013, and once on Sept. 20, 2013.
- 56. In that regard, copies of screenshots of each file that Defendant Parvizshahi "edited", "added" or in some way modified for the period Feb. 7, 2013 through Sept. 20, 2013 are reprinted below:





- 58. After Jan. 2014 (when he began working for Defendant Ro for Congress, Inc.), Defendant Parvizshahi continuously accessed the Honda Folders.
- 59. Specifically, Defendant Parvizshahi "edited", "added", or in some way modified individual documents within the Honda Folders at least forty-four (44) times. Several documents were "edited", "added", or in some way modified more than once.
- 60. In that regard, copies of screenshots of each file that Defendant Parvizshahi "edited", "added", or in some way modified for the period Jan. 1, 2014 through June 14, 2015 are reprinted below:

Feb 2014 PAC targets.xls • 4:04 PM

Edited by Brian Parvizshahi. . Desktop

Feb 2014 PAC targets.xls

2/18/2014 12:20 PM Brian

PAC Targets Hoyer.xls

2/18/2014 7:08 PM Brian

NVA conference call 022114.xls

Brian Parvizshahi edited on February 19, 2014

February 26, 2014

NVA conference call 022114.xls

2/19/2014 4:14 PM Brian

BrianParvi-PC

25

26

27

NVA conference call 022114... • 3:43 PM

Added by Brian Parvizshahi. . Desktop

022514 Labor List.xls

Brian Parvizshahi edited on February 25, 2014

1		
2	022514 Labor List.xls in /Honda	Modified 2/25/2014 9:57 AM Brian
3		
4	022614 Labor List.xls Brian Parvizshahi edited on February 26, 2014	
5	Brian Parvizsham edited on Pebruary 20, 2014	
6	022614 Labor List.xls	2/26/2014 3:03 PM Brian
7		
8		
9		2/26/2014 2:02 PM Pring
10	Labor list max outs 021814.xls	2/26/2014 3:03 PM Brian
11		
12	February 26, 2014	BrianParvi-PC
13	Labor list max outs 021814 • 3:15 PM	Added by Brian Parvizshahi. • Desktop
14		
15	2012 Contributions Industry Breakdown.xls	
16	2012 Contributions Industry Breakdown.xls Brian Parvizshahi edited on February 28, 2014	
17	February 28, 2014	
18	rebluary 26, 2014	BrianParvi-PC
19	2012 Contributions Industry • 9:37 PM	Added by Brian Parvizshahi. • Desktop
20	X 030514 MH Contribution 2008-2014.x	ls
21	Brian Parvizshahi edited on March 7, 2014	
22	March 7, 2014	BrianParvi-PC
23	030514 MH Contribution 20 • 11:11 PM	Added by Brian Parvizshahi. • Desktop
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25	Ten 112th and fire devices of	
26	X 112th pac fundraisers.xls Brian Parvizshahi edited on March 7, 2014	
27		

112th pac fundraisers.xls	3/7/2014 10:59 PM Brian
024042 MU	
X 031913 MH calls.xls Brian Parvizshahi edited on March 20, 2014	
March 21, 2014	
	BrianParvi-PC
031913 MH calls.xls • 1:23 AM	Added by Brian Parvizshahi. • Desktop
PAC Targets.xls	3/20/2014 4:54 PM Brian
PAC Targets.xls	Modified 3/20/2014 4:54 PM Brian
in /Honda/events/2014 Events	Modified 3/20/2014 4:54 PM Brian
031913 MH calls.xls	3/21/2014 1:23 AM Brian
X 042214 PAC Calls.xls Brian Parvizshahi edited on April 25, 2014	
042214 PAC Calls.xls	4/25/2014 4:26 PM Brian
O2 PAC Targets.xls	5/12/2014 11:51 AM Brian
PACs + Hosts List.xls	6/25/2014 11:23 AM Brian
	O31913 MH calls.xls Brian Parvizshahi edited on March 20, 2014 March 21, 2014 O31913 MH calls.xls • 1:23 AM PAC Targets.xls in /Honda/events/2014 Events O31913 MH calls.xls AU O31913 MH calls.xls PAC Targets.xls in /Honda/events/2014 Events

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October 23, 2014

102314 Tribe Contributions.... • 10:21 PM

Added by Brian Parvizshahi. • Desktop

COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES

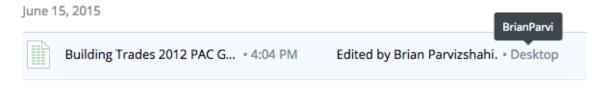
BrianParvi-PC

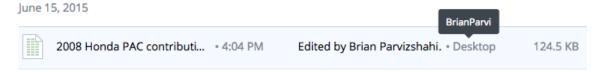
1	October 23, 2014	BrianParvi-PC
2 3	101413 Contributions.xls • 10:23 PM	Added by Brian Parvizshahi. • Desktop
4 5	2012&2014 Contribution Comparison.xls	10/23/2014 10:22 PM Brian
6	October 23, 2014	
7 8	2012&2014 Contribution Co • 10:22 PM	Added by Brian Parvizshahi. • Desktop
9		
10	Tech List.xls • 10:18 PM	Added by Brian Parvizshahi. • Desktop
11		
12	October 23, 2014	
13 14	Tech List.xls • 10:18 PM	Added by Brian Parvizshahi. • Desktop
15 16 17 18	110314 Double Max PAC List .xls Brian Parvizshahi edited on November 3, 2014	
19 20 21	110314 NVA PAC List.xls Brian Parvizshahi edited on November 3, 2014	
22 23 24	110314 PAC 2014 General Max.xls Brian Parvizshahi edited on November 3, 2014	
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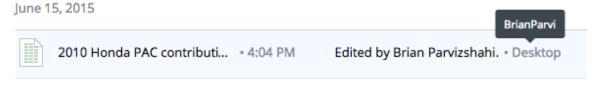
March 2, 2015 Indo contributions targets 2... • 5:36 PM Edited by Brian Parvizshahi. . Desktop

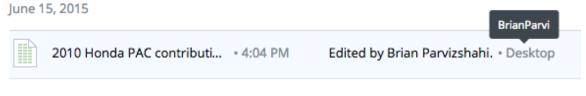
BrianParvi

- 61. On June 15, 2015, Defendant Parvizshahi "edited" the Honda Folders for the last time.
- 62. Copies of screenshots of each file that Defendant Parvizshahi "edited", "added", or in some way modified on June 15, 2015 are reprinted below:

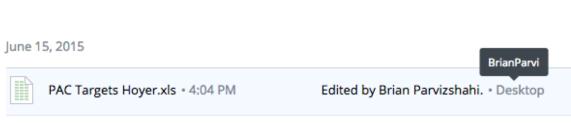


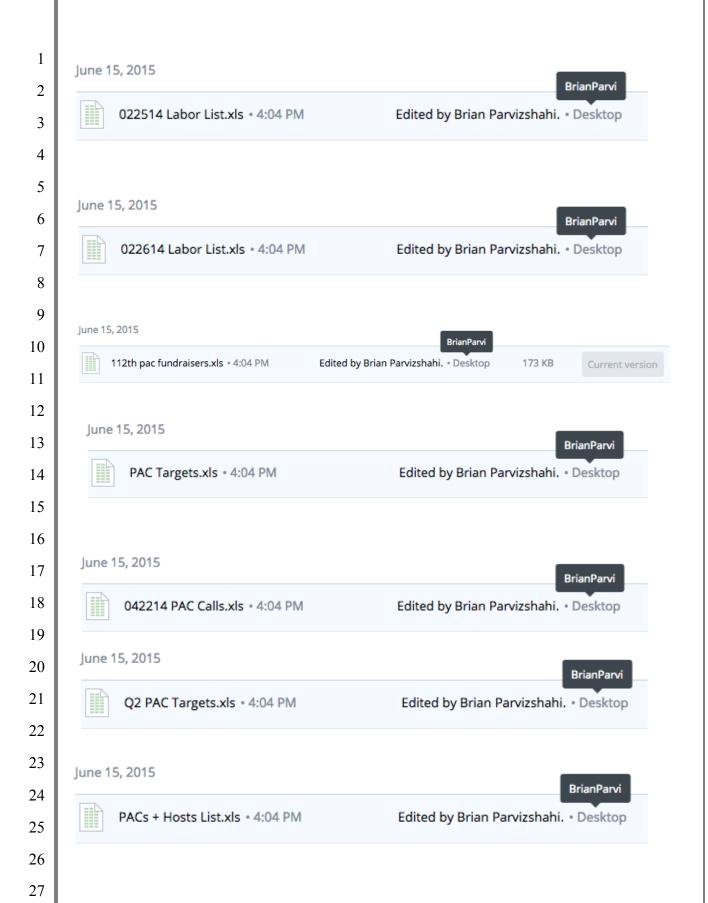












June 15, 2015	BrianParvi
2014 Summer PAC List .xls • 4:04 PM	Edited by Brian Parvizshahi. • Desktop
June 15, 2015	BrianParvi
110314 Double Max PAC Lis • 4:04 PM	Edited by Brian Parvizshahi. • Desktop
June 15, 2015	BrianParvi
110314 NVA PAC List.xls • 4:04 PM	Edited by Brian Parvizshahi. • Desktop
June 15, 2015	BrianParvi
110314 PAC 2014 General • 4:04 PM	Edited by Brian Parvizshahi. • Desktop
	Edited by Brian Parvizsriani Desktop

Defendant Khanna's Email Accosting of Mike Honda for Congress Supporters

- 63. Beginning Saturday, Oct. 3, 2015, sixteen individuals contacted Mike Honda for Congress to report that Defendant Khanna had accosted Mike Honda for Congress supporters by directly emailing them on Oct. 3, 2015.
- 64. In each of those emails which were sent in at least four batches at 3:10, 3:14, 3:15, and 3:17 pm PT supporters were asked if they "might have time for a call" to discuss Defendant Khanna's race against Congressmember Honda.
- 65. In each of those emails, Defendant Khanna further stated that "Honda's ethics scandal has convinced many voters about the need for change." Defendant Khanna's email also contained, under the heading of "Recent Press", links to a number of articles that were critical of Congressmember Honda.
- 66. At the time, Honda for Congress did not know Mr. Khanna and his campaign had obtained the names and current email addresses of its donors. Those items are the

- lifeblood of any successful fundraising (and political) campaign.
- 67. The sixteen individuals who contacted Honda for Congress regarding Mr. Khanna's email were likely the tip of the iceberg. Namely, for every donor who contacted Honda for Congress, there likely were at least 50-100 donors who did *not* contact Honda for Congress.
- 68. As of today, Honda for Congress has gathered Declarations from six supporters of Mike Honda for Congress regarding the emails that they received from Defendant Khanna on Oct. 3, 2015: Garnetta Annable; Judy Bertelsen; Kalyn Free (who lives in Oklahoma); Fayzan Gowani (who has never resided in California's 17th Congressional District); Washington State Senator Bob Hasegawa (who lives in Washington State); and Dale Minami.
- 69. Between 3:10 pm and 3:17 pm PT on Oct. 3, 2015, each of the six supporters received an identical, blind-carbon-copied email from Defendant Khanna. In fact, two of the supporters (Ms. Bertelsen and Ms. Free) received the email at the same time: 3:17 pm PT.
- 70. Currently, one of the six supporters (Ms. Gowani) is not even listed in the Federal Election Commission's (FEC) donor records.² Another supporter (Ms. Annable) was not listed in the FEC's donor records until May 28, 2016.

Defendant Khanna's Responses to Inquiries Regarding His Email Accosting of Mike Honda for Congress Supporters

- 71. After being accosted by Defendant Khanna, Ms. Gowani asked, *inter alia*, Defendant Khanna how he had obtained her contact information: "Also, please explain *how* you found my email. *I have never and do not plan on voting or campaigning for you, nor have I ever resided in your district.*"
- 72. In an email (sent from his iPhone) on which Defendant Brian Parvizshahi was copied

Federal campaigns are required to report, to the Federal Election Commission, donations of more than \$200 during an election cycle. *See* 52 U.S.C. §30104(b)(3)(a); 11 C.F.R. §104.8(a).

³ Italics added.

1	(on his private, non-campaign email), Defendant Khanna answered in relevant part
2	
3	and asked Defendant Parvizshahi to "make sure" that Ms. Gowani had been removed
4	from the "friends list":
5	You were on a <i>friends list</i> as a prospect of someone who would find my campaign platform attractive as a next generation democrat I am sorry you were included on this list and we will take you off per your request.
6 7	Brian, please make sure of that.
8	73. After being accosted by Mr. Khanna, Ms. Bertelsen told Mr. Khanna that she strongly
9	supported Congressmember Khanna.
10	74. One hour later, Mr. Khanna emailed her a response. Among other things, he stated:
11	"I hope over the years I will be able to earn your trust."
12	The Anonymous Release of a Document Containing Confidential, Proprietary Information
13	Belonging to Mike Honda for Congress
14	75. On Dec. 16, 2015, San Jose <i>Inside</i> published, online, a document containing
15	confidential information of donors to Mike Honda for Congress. That document
16	included the donors' names, preferred nicknames, employer information, personal
17	telephone numbers, and preferred nicknames.
18	76. According to <i>Inside</i> , that document had "arrived in the mail" from an anonymous
19	source in early December 2015.
20	The Discovery of the Data Breach
21	77. On May 31, 2016, Randy Broz, the fundraising consultant for Mike Honda for
22	Congress, received a notification from Dropbox that files in the "Honda" folder had
23	been modified.
24	78. In response, Sudip Dutta, then the Finance Director of Mike Honda for Congress, sent
25	an email to Arum Group's Madalene Mielke, the previous fundraising consultant for
26	Mike Honda for Congress, to inquire about those Dropbox files.
27	79. In response, Ms. Mielke sent an email to Mr. Dutta that same day. In that email, Ms.
28	Mielke stated that (1) Defendant Parvizshahi had previously been an intern for Arum
	COMPLAINT EOD INH INCTIVE DELIEE

- Group, (2) Defendant Parvizshahi had not been previously removed from the Dropbox access list with respect to the files of Mike Honda for Congress, and (3) upon discovering that inadvertent oversight, she had removed Defendant Parvizshahi's name from the Dropbox access list.
- 80. Subsequently, Michael Beckendorf, Campaign Manager of Mike Honda for Congress, requested access to the file from Ms. Mielke; and she provided him with access to the files in Dropbox. Mr. Beckendorf began to examine the Honda Folders to determine what information had been exposed.
- 81. In so doing, Mr. Beckendorf found that many files within the Honda Folders had timestamps noting that Defendant Parvizshahi had accessed and made edits to those files after he had left Arum Group, LLC and *throughout the time when he was working for Ro for Congress, Inc.*
- 82. That same day (May 31, 2016), Mr. Beckendorf contacted Robert Eberhardt, Mike Honda for Honda's opposition researcher, to assist in assessing the nature of information that had been compromised. For this purpose, Mr. Eberhardt was given access to the Honda Folders.
- 83. Mr. Beckendorf also asked Vedant Patel, Communications Director to Mike Honda for Congress, to assist in assessing the scope of the data breach.
- 84. It became clear to Mike Honda for Congress that Defendant Parvizshahi had begun accessing confidential information belonging to Mike Honda for Congress after leaving Arum Group, and had continued accessing that information while working for Ro for Congress, Inc.
- 85. After examining the Honda Folders, Mr. Beckendorf also discovered that a spreadsheet entitled "2012 2010 Crane Club Cycle Report.xls" *matched perfectly* with the donor document that had been anonymously provided to and published by San Jose *Inside* on Dec. 16, 2015.
- 86. In response, Mr. Beckendorf promptly notified Congressmember Honda that

Defendant Parvizshahi had obtained access to the confidential, proprietary information of Mike Honda for Congress.

- 87. In addition, Mr. Beckendorf sent an email to his Campaign Team at 4:48 pm on May 31, 2016. In that email, he notified the following members of Mike Honda for Congress that Defendant Parvizshahi had obtained access to the campaign's sensitive donor information: Vedant Patel (Communications Director); Raghu Devaguptpu and Rachel Irwin (AL Media); Adnaan Muslim and Mara Kunin (Mission Control, Inc.); David Mermin (Lake Research Partners); Robert Eberhardt (Stanford Caskey); and Mike Nellis and MaryCate Brower (Revolution Messaging).
- 88. In that email, Mr. Beckendorf notified his Campaign Team that a significant amount of our campaign's confidential fundraising had been compromised:

Rob[ert Eberhardt] is currently through all the information that was exposed to the Khanna campaign leading [up to] [20]15.

Safe to say that had access to EVERYTHING last cycle.⁴

- 89. Shortly thereafter, Mr. Beckendorf received an email from Robert Eberhardt, Mike Honda for Congress' Opposition Researcher. In that email, Mr. Eberhardt stated: "Yeah, as Michael [Beckendorf] said, it looks like *everything* related to Mike Honda's fundraising over the last years is in this folder that Brian [Parvizshahi] had access to."⁵
- 90. Among other things, Mr. Eberhardt stated that the Honda Folders contained personal contact information of the campaign's large-dollar and small-dollar donors.

The Donor Document Entitled "030514 MH contribution 2008-2014.xls"

91. As seen above, on March 7, 2014 Defendant Parvizshahi "edited" and "added" a donor file entitled "030514 MH contribution 2008-2014.xls" (hereinafter, the "Donor Document"):

⁴ Capitalization in original.

⁵ Italics added.



March 7, 2014





030514 MH Contribution 20... • 11:11 PM

Added by Brian Parvizshahi. • Desktop

- 92. The Donor Document contains detailed donor information from 2008 to 2014, including but not limited to: date of donation, amount, contact name, employer, occupation, city and state of residence, email, phone numbers. As the first page of the document (at top left) shows, the Donor Document provides detailed information with respect to donations totaling to \$3,500,594.11.
- 93. In that regard, the Donor Document contained 9793 entries of confidential donor information, including that of the six supporters mentioned earlier: Garnetta Annable; Judy Bertelsen; Kalyn Free; Fayzan Gowani; Washington State Senator Bob Hasegawa; and Dale Minami.

The Harm Caused by the Data Breach and Defendant Khanna's Accosting of Mike Honda for Congress Supporters: Assessment Costs

- 94. Mike Honda for Congress has suffered severe harm that was directly caused by the data breach and Defendant Khanna's solicitation of our donors.
- 95. Among other things, Mike Honda for Congress was forced to spend \$5,109.36 in order to assess the extent to which the Honda Folders had been compromised.
- 96. Specifically, Mr. Beckendorf devoted 60 hours (at his hourly rate of \$53.12) conducting and compiling research, participating in conference calls, coordinating team strategy, and reaching out to donors. That amount totaled to \$3,187.50.
- 97. Mike Honda for Congress' Opposition Researcher Robert Eberhardt devoted 15 hours (at his hourly rate of \$100) conducting and compiling research and participating in conference calls. That amount totaled to \$1,500.00.
- 98. Mike Honda for Congress' Communications Director Vedant Patel devoted 15 hours

(at his hourly rate of \$28.12) conducting and compiling research, participating in conference calls, and developing press and communications strategy. That amount totaled to \$421.86.

The Harm Caused by the Data Breach and Defendant Khanna's Accosting of Mike Honda for Congress Supporters: Harm to Rep. Honda's Relationship with Supporters

- 99. When it comes to fundraising, Congressmember Honda abides by a simple rule: As a matter of respect, one should never solicit supporters of his or her opponent.
- 100. Because it is costly to campaign across a highly populated metropolitan area, it is critical not only to convince supporters to donate, but also to encourage them to continue to donate up to the legally allowed limit.
- 101. The data breach into Mike Honda for Congress' confidential, proprietary information has already irreparably harmed it in at least three serious ways.
- 102. First, its supporters were harassed and intimidated, for Defendant Khanna accosted them at a place that they had least expected: their email inbox. In response, some donors may have reduced or stopped altogether their financial support for Mike Honda for Congress.
- 103. Second, the data breach into confidential, proprietary information has compromised Rep. Honda's relationships with supporters – which, in many cases, he has cultivated for years.
- 104. *Third*, the data breach personally embarrassed Rep. Honda and harmed his reputation. Not only were his supporters subjected to Mr. Khanna's attacks upon Congressmember Honda, but the disclosure of confidential, proprietary information from the Honda Folders also resulted in adverse publicity for Rep. Honda.
- 105. Unless all Defendants are ordered to return and stop using all information obtained from the data breach, Congressmember Honda's campaign will continue to suffer irreparable harm.

Defendants Have Directly Benefited from Their Wrongdoing

106. Each Defendant has directly benefited from their wrongdoing. Defendant Pavizshahi parlayed his illegal access to the Honda Folders into his current, well compensated position as Campaign Manager in a high-profile Congressional race. Defendant Ro for Congress, Inc. and Defendant Khanna used Honda for Congress' confidential, proprietary information not only to harass and intimidate Mike Honda for Congress supporters, but to harm Congressmember Honda's reputation and political standing.

COUNT 1

Computer Fraud and Abuse Act

(Violation of 18 U.S.C. §1030(a))

Against Defendants Brian Parvizshahi and Ro for Congress, Inc.

- 107. Mike Honda for Congress incorporates by reference the foregoing allegations.
- 108. On February 7, 2013, February 18, 2013, June 23, 2013, February 18, 2014, February 19, 2014, February 25, 2014, February 26, 2014, February 28, 2014, March 7, 2014, March 20, 2014, March 21, 2014, April 25, 2014, May 12, 2014, June 25, 2014, September 25, 2014, October 23, 2014, November 3, 2014, March 2, 2015, June 15, 2015, as well as on other dates currently unknown to Mike Honda for Congress, Defendants Parvizshahi intentionally accessed Mike Honda for Congress' protected data stored in Arum Group's Dropbox account for the purpose of obtaining Mike Honda for Congress' confidential and proprietary information.
- 109. On February 18, 2014, February 19, 2014, February 25, 2014, February 26, 2014, February 28, 2014, March 7, 2014, March 20, 2014, March 21, 2014, April 25, 2014, May 12, 2014, June 25, 2014, September 25, 2014, October 23, 2014, November 3, 2014, March 2, 2015, June 15, 2015, as well as on other dates currently unknown to Mike Honda for Congress, Defendant Parvizshahi and Defendant Ro for Congress, Inc. intentionally accessed Mike Honda for Congress' confidential, proprietary information stored in Arum Group's Dropbox account for the purpose of obtaining

Mike Honda for Congress' confidential and proprietary information.

- 110. Neither Defendant Parvizshahi nor his employer Defendant Ro for Congress, Inc. had authorization or permission to access this account on the aforementioned dates in 2013, 2014, and 2015.
- 111. Defendant Parvizshahi used and abused his access (granted during his brief internship with Arum Group) to log into Arum Group's Dropbox account. During these sessions, Defendant Parvizshahi and Defendant Ro for Congress, Inc. obtained confidential, proprietary information about Mike Honda for Congress' past, current and potential donors and their financial data.
- 112. Defendant Parvizshahi and Defendant Ro for Congress, Inc. have utilized this confidential and proprietary client information for their own benefit, and to the detriment of Mike Honda for Congress.
- 113. Defendant Parvizshahi's and Defendant Ro for Congress, Inc.'s actions, as described above, violate 18 U.S.C. §1030(a). As a direct and proximate result of those actions, Mike Honda of Congress has been injured in an amount to be proven at trial. Accordingly, Mike Honda for Congress seeks all available compensatory and injunctive relief.

COUNT 2

Computer Fraud and Abuse Act: Conspiracy

(Violation of 18 U.S.C. §1030(b))

Against Defendants Brian Parvizshahi, Ro for Congress, Inc., and Rohit "Ro" Khanna

- 114. Mike Honda for Congress incorporates by reference the foregoing allegations.
- 115. Beginning approximately January 2014, Defendant Parvizshahi, Defendant Ro for Congress, Inc., and Defendant Khanna had an understanding, whereby (1) Defendant Parvizshahi obtained Mike Honda for Congress' confidential, proprietary information from the Arum Group's Dropbox account, and (2) all three Defendants used that information for their benefit and to the detriment of Mike Honda for Congress, Inc.

- 116. Among other things, that collaboration between the Defendants enabled them to create what Defendant Khanna called a "friends list" one that consists of supporters of Mike Honda for Congress. In that regard, Defendant Khanna personally responded to inquiries from Mike Honda for Congress supporters regarding the "friends list"; and, as needed, directed Defendant Parvizshahi to remove certain Mike Honda for Congress supporters (like Fayzan Gowani) from the "friends list".
- 117. Defendants' actions, as described above, violate 18 U.S.C. §1030(b). As a direct and proximate result of those intentional actions, Mike Honda of Congress has been injured in an amount to be proven at trial. Accordingly, Mike Honda for Congress seeks all available compensatory and injunctive relief.

COUNT 3

Theft of Trade Secrets

(Violation of 18 U.S.C. §§1832, et seq.)

Against Defendants Brian Parvizshahi, Ro for Congress, Inc., and Rohit Khanna

- 118. Mike Honda for Congress incorporates by reference the foregoing allegations.
- 119. On February 7, 2013, February 18, 2013, June 23, 2013, February 18, 2014, February 19, 2014, February 25, 2014, February 26, 2014, February 28, 2014, March 7, 2014, March 20, 2014, March 21, 2014, April 25, 2014, May 12, 2014, June 25, 2014, September 25, 2014, October 23, 2014, November 3, 2014, March 2, 2015, June 15, 2015, as well as on other dates currently unknown to Mike Honda for Congress, Defendant Parvizshahi intentionally accessed Mike Honda for Congress' protected data stored in Arum Group's Dropbox account for the purpose of obtaining Mike Honda for Congress' confidential and proprietary information.
- 120. On February 18, 2014, February 19, 2014, February 25, 2014, February 26, 2014,
 February 28, 2014, March 7, 2014, March 20, 2014, March 21, 2014, April 25, 2014,
 May 12, 2014, June 25, 2014, September 25, 2014, October 23, 2014, November 3,
 2014, March 2, 2015, June 15, 2015, as well as on other dates currently unknown to

Mike Honda for Congress, Defendant Parvizshahi and Defendant Ro for Congress, Inc. intentionally accessed Mike Honda for Congress' confidential, proprietary information store in Arum Group's Dropbox account for the purpose of obtaining Mike Honda for Congress' confidential and proprietary information.

- 121. On February 18, 2014, February 19, 2014, February 25, 2014, February 26, 2014, February 28, 2014, March 7, 2014, March 20, 2014, March 21, 2014, April 25, 2014, May 12, 2014, June 25, 2014, September 25, 2014, October 23, 2014, November 3, 2014, March 2, 2015, June 15, 2015, as well as on other dates currently unknown to Mike Honda for Congress, Defendant Parvizshahi, Defendant Ro for Congress, Inc., and Defendant Khanna conspired to intentionally access Mike Honda for Congress' confidential, proprietary information stored in Arum Group's Dropbox account for the purpose of obtaining Mike Honda for Congress' confidential and proprietary information.
- 122. The confidential, proprietary information that was accessed contained, *inter alia*, trade secret data regarding past, current, and potential donors of Mike Honda for Congress.
- 123. As such, that information derived independent economic value by not being generally known to the public and was subject to reasonable efforts to maintain its secrecy. Arum Group's Dropbox account was password protected, and Defendant Parvizshahi signed an Internship Agreement containing a non-disclosure agreement (NDA) as a condition of his internship with Arum Group. The terms of that NDA survive to this day.
- 124. Neither Defendant Parvizshahi nor Defendant Ro for Congress, Inc. had authorization to access the data in Arum Group's Dropbox account.
- 125. Defendant Parvizshahi, Defendant Ro for Congress, Inc., and Defendant Khanna intended to use the trade secret data about Mike Honda for Congress' past, current, and potential donors for their economic benefit.

- 126. Defendants' actions, as described above, violate 18 U.S.C. § 1832, *et seq.*, which provides for civil remedies under the Defend Trade Secrets Act (18 U.S.C. §1836).
- 127. The aforementioned conduct of Defendant Parvizshahi, Defendant Ro for Congress, Inc., and Defendant Khanna unlawful conduct is continuing, and there is no indication that any of them will refrain from continuing such activity in the future. If they are not enjoined from the conduct set forth in this Complaint, they will continue to violate federal law.
- 128. As a direct and proximate result of Defendants' willful and malicious actions,
 Mike Honda for Congress has been injured in an amount to be proven at trial. Mike
 Honda for Congress seeks compensatory damages, exemplary damages, disgorgement
 of ill gotten gains (including campaign contributions), injunctive relief, and attorney's
 fees.

REQUEST FOR RELIEF

Mike Honda for Congress requests the following relief:

- A. Compensatory damages;
- B. Exemplary damages;
- C. Injunctive relief, including but not limited to the return and destruction of all illegally obtained information and all ill gotten gains;
- D. Reasonable attorney's fees and costs; and
- E. All another relief that the Court deems just and proper.

Case 5:16-cv-05416 Document 1 Filed 09/22/16 Page 29 of 29 DATED: Sept. 22, 2016 BUSINESS, ENERGY, AND ELECTION LAW, PC By: GAUTAM DUTTA, ESQ. Attorneys for Plaintiff MIKE HONDA FOR CONGRESS COMPLAINT FOR INJUNCTIVE RELIEF - 29 -

1 2 3 4	Gautam Dutta, Esq. (State Bar No. 199326) BUSINESS, ENERGY, AND ELECTION L 5655 Silver Creek Valley Rd. # 900 San Jose, CA 95138 Telephone: 415.236.2048 Email: Dutta@BusinessandElectionLaw.com Fax: 213.405.2416		
5	Attorneys for Plaintiff		
6	MIKE HONDA FOR CONGRESS		
7			
8	IN THE UNITED ST	ATES DISTRICT COURT	
9	NORTHERN DISTRICT OF C	ALIFORNIA, SAN JOSE DIVISION	
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11	MIKE HONDA FOR CONGRESS,	CASE NO.	
12	an unincorporated political association,		
13	Plaintiff,	NOTICE OF MOTION AND MOTION	
14	VS.	FOR PRELIMINARY INJUNCTION; POINTS AND AUTHORITIES	
15	BRIAN PARVIZSHAHI, an individual,	HEARING DATE: TBD	
16	RO FOR CONGRESS, INC.,	HEARING TIME: TBD JUDGE: TBD	
17	a California corporation,	COURTROOM: TBD	
18	ROHIT "RO" KHANNA, an individual,		
19	and DOES 1 through 10,		
20	Defendants.		
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NOTICE OF MOTION

TO THE COURT, THE PARTIES AND THEIR ATTORNEYS OF RECORD:

Please take notice that, as soon as this matter may be heard before the assigned judge in the United States District Court for the District of Northern California, San Jose Division, located at 280 South First Street, San Jose, California 95113, Plaintiff Mike Honda for Congress will move this Court to issue a preliminary injunction (1) enjoining Defendant Brian Parvizshahi, Defendant Ro for Congress, Inc., and Defendant Rohit "Ro" Khanna from violating, and continuing to violate, the Computer Fraud and Abuse Act ("CFAA", 18 U.S.C. §1030); (2) enjoining Defendant Parvizshahi, Defendant Ro for Congress, Inc., and Defendant Khanna from continuing to use Mike Honda for Congress' confidential and proprietary information that they have illegally obtained in violation of the CFAA, and (3) ordering Defendant Brian Parvizshahi, Defendant Ro for Congress, Inc., and Defendant Rohit "Ro" Khanna to promptly disgorge and destroy all confidential and proprietary information that they have illegally obtained in violation of the CFAA.

Plaintiff's Motion is based on this Notice of Motion and Motion, along with the accompanying Memorandum of Points and Authorities, Request for Judicial Notice, and the Declarations of Garnetta Annable, Michael Beckendorf, Judy Bertelsen, Robert Eberhardt, Kalyn Free, Fayzan Gowani, Hon. Robert "Bob" Hasegawa, Hon. Michael "Mike" M. Honda, Madalene Xuan-Trang Mielke, Dale Minami, Gautam Dutta, Bill O'Day, and Alison Woodworth.

Case 5:16-cv-05416 Document 5 Filed 09/22/16 Page 3 of 26 DATED: Sept. 22, 2016 Respectfully submitted, By: /s/ Gautam Dutta GAUTAM DUTTA, ESQ. Attorneys for Plaintiff MIKE HONDA FOR CONGRESS

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MEMORANDUM OF POINTS AND AUTHORITIES

I. Introduction

Unless the Court grants this Motion, Mike Honda for Congress will suffer irreparable harm – and the privacy of *thousands* of supporters of U.S. Rep. Mike Honda will continue to be violated – because Defendants Brian Parvizshahi, Ro for Congress, Inc., and Rohit "Ro" Khanna have illegally seized, used, and abused confidential, proprietary information belonging to Mike Honda for Congress. In so doing, Defendants violated, *inter alia*, the Computer Fraud and Abuse Act ("CFAA", 18 U.S.C. §1030).

Time is of the essence. The Nov. 8, 2016 election between Rep. Honda and Defendant Khanna will be held in a matter of weeks. To date, confidential, proprietary information belonging to Mike Honda for Congress has been illegally released. Equally troubling, potentially thousands of supporters of Mike Honda for Congress have been personally pressured and intimidated by Defendant Khanna at a place that they had least expected: their own email inbox.

The illegal data breach perpetrated by Defendants has already personally embarrassed Rep. Honda, compromised his relationship with supporters, and harmed his reputation. Unless this Court swiftly intercedes, Mike Honda for Congress and thousands of Rep. Honda's supporters will continue to suffer irreparable harm.

II. Procedural Background

A. The Parties

Plaintiff **Mike Honda for Congress** is an unincorporated political association with its principal place of business in Santa Clara County, California.

Defendant **Brian Parvizshahi** works from a place of business located in Santa Clara County, California.

Defendant **Ro for Congress, Inc.,** a California corporation that was incorporated in 2011, conducts business from and maintains an office in Santa Clara County, California.

Defendant Rohit "Ro" Khanna is a resident of Alameda County, and works from a place

1 of business located in Santa Clara County.¹ 2 В. Jurisdiction and Venue 3 This action arises under 18 U.S.C. §1030 and 18 U.S.C. §§1832, et seq. in relation to 4 Defendants' unlawful actions. Accordingly, this Court has federal-question jurisdiction under 28 5 U.S.C. §1331 and 28 U.S.C. §1343. 6 All or most of the practices, events, and omissions alleged in this Complaint occurred in 7 Santa Clara County. Accordingly, venue is appropriate for the U.S. District Court for the 8 Northern District of California, San Jose Division, pursuant to 28 U.S.C. §1391(b)-(c). 9 III. **Factual Background** 10 The Race for California's 17th Congressional District A. Rep. Mike Honda represents California's 17th Congressional District, an area that 11 comprises a core part of Silicon Valley: Cupertino, Sunnyvale, Santa Clara, Milpitas, Newark, 12 and parts of San Jose and Fremont.² 13 14 In 2004, Defendant Khanna unsuccessfully ran for the U.S. House of Representatives 15 against the late Congressmember Tom Lantos, who represented San Mateo County and a part of 16 San Francisco County. In 2014, Defendant Khanna unsuccessfully challenged Congressmember 17 Honda for his current seat. Because they were the top two finishers in California's June 7, 2016 18 "Top Two" Primary, Congressmember Honda and Defendant Khanna advanced to the looming 19 Nov. 8, 2016 general election.³ 20 Defendant Parvizshahi joined Defendant Ro for Congress, Inc. as Data Director in January 21 2014, and was promoted to Campaign Manager the following year.⁴ 22 В. Defendant Parvizshahi's Brief Internship with Mike Honda for Congress' Consultant 23 24 On April 25, 2005, Mike Honda for Congress and Madalene Mielke entered into an 25 1 Dutta Decl. ¶¶3-6. 26 2 Beckendorf Decl. ¶1. 27 3 Beckendorf Decl. ¶¶5-7. Beckendorf Decl. ¶8 & Exh. 2. 28

1	agreement (the "Agreement"), whereby Ms. Mielke became the fundraising consultant to Mike
2	Honda for Congress. ⁵ Pursuant to the Agreement (art. VI), Mike Honda for Congress solely or
3	jointly owned all information (including fundraising and donor information) developed during the
4	term of the Agreement. All such information was deemed "confidential" and was required to be
5	held "in absolute confidence".6
6	Subsequently, Ms. Mielke founded Arum Group, LLC. After Arum Group was
7	incorporated, Ms. Mielke's role as fundraising consultant under the Agreement was transferred to
8	Arum Group. ⁷ Pursuant to the terms of the Agreement, Arum Group served as fundraising
9	consultant to Mike Honda for Congress until December 2014.8
10	Defendant Parvizshahi began what was intended to be his summer-long internship at
11	Arum Group in May 2012. Like other Arum Group interns, Mr. Parvizshahi was required to sign
12	an Internship Agreement, which contained a non-disclosure agreement (NDA) with respect to
13	Arum Group's confidential, client information. ¹⁰ In relevant part, the Internship Agreement
14	stated:
15	1. You agree that you will not in any way discuss information obtained in
16	connection with your position with the Arum Group outside of the Arum Group's clients.
17	2. You will treat any confidential or non-public information provided to
18	you by the Arum Group as <i>strictly confidential</i> . Any dissemination or discussion regarding such confidential information is <i>prohibited</i> with
19	anyone outside of the Arum Group, unless permission to disseminate or discuss such information is granted. This confidentiality requirement
20	shall survive the termination of this agreement. 11
21	Defendant Parvizshahi was given access to some of Arum Group's confidential client
22	information, including confidential, proprietary information belonging to Mike Honda for
23	5 Mielke Decl. ¶7.
24	6 Mielke Decl. ¶7.
25	⁷ Mielke Decl. ¶10.
26	Mielke Decl. ¶11.
27	Woodworth Decl. ¶21. Mielke Decl. ¶17, 27-29
28	Mielke Decl. ¶20 & Exh. 1 (italics added).

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C. <u>Defendant Parvizshahi Gains Dropbox Access to Mike Honda for Congress'</u> Confidential, Proprietary Information

Dropbox is a cloud (online) storage service that is frequently used for sharing and synchronizing files.¹³ Arum Group shared access of certain files within Arum Group's Dropbox account by sending an "invitation" to the personal (i.e., non-Arum Group) email address of every intern, including that of Defendant Parvizshahi.¹⁴

Defendant Parvizshahi was given access to two Dropbox folders: (1) an Intern folder, and (2) a folder containing fundraising information relating to Mike Honda for Congress (hereinafter, the "Honda Folders"). During his internship, Mr. Parvizshahi disliked performing what he deemed to be menial tasks. ¹⁶

On June 8, 2012, Defendant Parvizshahi abruptly resigned from his internship. After his last day at Arum Group, Mr. Parvizshahi's access to Arum Group's Dropbox account was inadvertently not withdrawn. Arum Group continued to serve as the fundraising consultant for Mike Honda for Congress until December 2014.

D. The Uniqueness of Each Dropbox Account

A Dropbox account is created using at least the following pair: a person's "username" and password. This access granted to the person using that username is unique. For example, suppose that one Dropbox account is created and then deleted, and later a second account is created with the *same* username. In that scenario, the access to the shared data of the first account

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Woodworth Decl. ¶¶13, 20.

¹³ O'Day Decl. ¶7.

²⁴ Voodworth Decl. ¶19.

Woodworth Decl. ¶20.

Woodworth Decl. ¶23.

Woodworth Decl. ¶25.

¹⁸ O'Day Decl. ¶11.

¹⁹ O'Day Decl. ¶12.

would *not* be accessible to the second account.²⁰

Each Dropbox account has the ability to tie the account to an arbitrary number of computers.²¹ Each computer would have an alias (nickname) assigned to it. Data on Dropbox is shared by means of "user permissions". For example, if user1@example.com authorizes access to a shared folder (titled "SHARES") to user2@example.com, user2 would be able to access all files in SHARES from all devices until that access is withdrawn by user1.²²

Dropbox's "Acceptable Use Policy" prohibits users from "violat[ing] the law in any way", or "even try[ing] to ... violate the privacy or infringe the rights of others."²³

E. Sharing Information on Dropbox: "Edited", "Removed", and "Added"

In a shared Dropbox folder, all authorized users are granted access as "permissioned" (generally, read-only access or full access).²⁴ Any change to a file is recorded on Dropbox as "In <Shared Folder Name>, <user> <action> <filename>."²⁵

There are three main types of "actions" that can be made to a Dropbox file.²⁶ A file can be "edited", "removed", or "added". An "edited" action means that the file had a new (updated) version of itself uploaded to the shared location within the Dropbox account. "Edited" often means that the file was *last* viewed by a user at the time the "edited" action was recorded on Dropbox.²⁷

Notably, just because a file has been edited does not necessarily mean that the *content* of the file has changed. Many files have additional "metadata" stored in them: information keeping track of edits, summary information, view information, and other information relating to the state

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²³ O'Day Decl. ¶13.

²¹ O'Day Decl. ¶14.

^{24 22} O'Day Decl. ¶15.

²⁵ See https://www.dropbox.com/privacy#acceptable_use (last visited Sept. 20, 2016).

O'Day Decl. ¶16.

²⁵ O'Day Decl. ¶17.

²⁶ O'Day Decl. ¶18.

²⁷ O'Day Decl. ¶19.

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of a document outside of the content itself.²⁸ Such metadata are therefore much more volatile. For example, changing a Word document from "Print" view to "Draft" view would constitute a change in state and would be saved and recorded on Dropbox *even if* nothing else occurred.²⁹

A file that was "edited" *was definitely opened by the Dropbox user*. More could have

A file that was "edited" was definitely opened by the Dropbox user. More could have been done to the file; but the "edited" marker indicates, at a bare minimum, that the file was opened.³⁰

A "removed" action means that the file was removed from the shared location within the Dropbox account.³¹

An "added" action means that a new file was added to the shared location within the Dropbox account.³² From a forensic standpoint, Dropbox files labeled as "added" are the most interesting, for those files are the ones with which that person making the change spent the most time.³³

If a Dropbox file shows an action of "added" and that file had existed *before* the "added" action occurred, it means that the file was (a) removed from the shared location within the Dropbox account, and then (b) was *re*-added (i.e., was moved back) to the shared location within the Dropbox account.³⁴ This scenario most often occurs when someone has *removed* the file to another location (e.g., his or her desktop) – and then *moved the file back* to the shared location within the Dropbox account.³⁵

F. Meaning of the "Desktop" Label in "Added" or "Edited" Actions

When Dropbox shows that a file has been "added" or "edited", a label of "Desktop" or "Website" appears on the same line. That label ("Desktop" or "Website") shows the *source* of

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<sup>28</sup> O'Day Decl. ¶20.
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²⁹ O'Day Decl. ¶21.

³⁰ O'Day Decl. ¶22.

O'Day Decl. ¶23.

³² O'Day Decl. ¶24.

³³ O'Day Decl. ¶25.

³⁴ O'Day Decl. ¶26.

³⁵ O'Day Decl. ¶27.

1 the action that was taken.³⁶ 2 If the label is "Desktop", hovering over this label will reveal the alias (nickname) of the computer used to make the edits.³⁷ If more than one alias is seen, it means that (1) more than one 3 4 computer was used to make the edits, and (2) the user had authorized a number of computers to 5 access both his or her personal Dropbox account and, by extension, any shared folders tied to that 6 account.38 7 G. Defendant Parvizshahi Accesses Mike Honda for Congress' Confidential, 8 Proprietary Data After Leaving His Internship With Mike Honda for Congress' 9 Consultant 10 After leaving Arum Group, Defendant Parvizshahi continued to access the confidential. 11 proprietary data belonging to Mike Honda for Congress. During the relevant period, Defendant 12 Parvizshahi accessed the Honda Folders from one of two computers: one had the alias of "BrianParvi-PC"; the other had the alias of "BrianParvi".³⁹ 13 14 Between Feb. 7, 2013 and Sept. 20, 2013, Mr. Parvizshahi "edited", "added", or in some 15 way modified the Honda Folders at least a total of seven times: three times on Feb. 7, 2013, once on Feb. 18, 2013, twice on June 23, 2013, and once on Sept. 20, 2013. True and accurate copies 16 17 of screenshots of each file that Mr. Parvizshahi "edited", "added" or in some way modified for the period Feb. 7, 2013 through Sept. 20, 2013 have been reprinted in the accompanying 18 19 Declaration of Robert Eberhardt (¶18). 20 H. Defendant Parvizshahi Accesses Mike Honda for Congress' Confidential, 21 Proprietary Data Throughout His Employment with Defendant Ro for Congress, 22 Inc. 23 After Jan. 2014 (when he began working for Defendant Ro for Congress, Inc.), Defendant 24 36 O'Day Decl. ¶28. O'Day Decl. ¶29.

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O'Day Decl. ¶30.

³⁹ Eberhardt Decl. ¶16.

Eberhardt Decl. ¶17.

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successful fundraising (and political) campaign.⁴⁸

The sixteen individuals who contacted Honda for Congress regarding Mr. Khanna's email were likely the tip of the iceberg. Namely, for every donor who contacted Honda for Congress, there likely were at least 50-100 donors who did *not* contact Honda for Congress.⁴⁹

As of today, Honda for Congress has gathered Declarations from six supporters of Mike Honda for Congress regarding the emails that they received from Defendant Khanna on Oct. 3, 2015: Garnetta Annable, Judy Bertelsen, Kalyn Free (who lives in Oklahoma), Fayzan Gowani (who has never resided in California's 17th Congressional District), Washington State Senator Bob Hasegawa (who lives in Washington State), and Dale Minami.⁵⁰

Between 3:10 pm and 3:17 pm PT on Oct. 3, 2015, each of the six supporters received an identical, blind-carbon-copied email from Defendant Khanna.⁵¹ In fact, two of the supporters (Ms. Bertelsen and Ms. Free) received the email at the same time: 3:17 pm PT.⁵²

Currently, one of the six supporters (Ms. Gowani) is not even listed in the Federal Election Commission's (FEC) donor records.⁵³ Another supporter (Ms. Annable) was not listed in the FEC's donor records until May 28, 2016.⁵⁴

J. <u>Defendant Khanna's Responses to Inquiries Regarding His Email Accosting of</u>
<u>Mike Honda for Congress Supporters</u>

After being accosted by Defendant Khanna, Ms. Gowani asked, *inter alia*, Defendant Khanna how he had obtained her contact information: "Also, please explain *how* you found

Beckendorf Decl. ¶14.

⁴⁹ Beckendorf Decl. ¶15.

Annable Decl. ¶6 & Exh. 1; Bertelsen Decl. ¶6 & Exh. 1; Free Decl. ¶9 & Exh. 2, Gowani Decl. Exh. 1, Hasegawa Decl. ¶9, and Minami Decl ¶8.

Annable Decl. ¶6 & Exh. 1; Bertelsen Decl. ¶6 & Exh. 1; Free Decl. ¶9 & Exh. 2, Gowani Decl. Exh. 1, Hasegawa Decl. ¶9, and Minami Decl ¶8.

Free Decl. ¶9 & Exh. 2; Bertelsen Decl. ¶6 & Exh. 1.

Eberhardt Decl. ¶¶31, 32. Federal campaigns are required to report, to the Federal Election Commission, donations of more than \$200 during an election cycle. *See* 52 U.S.C. §30104(b)(3)(a); 11 C.F.R. §104.8(a).

Annable Decl. Exh. 2.

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1 my email. I have never and do not plan on voting or campaigning for you, nor have I ever 2 resided in vour district."55 3 In an email (sent from his iPhone) on which Defendant Brian Parvizshahi was copied (on 4 his private, non-campaign email), Defendant Khanna answered in relevant part and asked 5 Defendant Parvizshahi to "make sure" that Ms. Gowani had been removed from the "friends list": 6 You were on a *friends list* as a prospect of someone who would find my campaign 7 platform attractive as a next generation democrat. ... I am sorry you were included on this list and we will take you off per your request. 8 Brian, please make sure of that.⁵⁶ 9 After being accosted by Mr. Khanna, Ms. Bertelsen told Mr. Khanna that she strongly 10 supported Congressmember Khanna.⁵⁷ One hour later, Mr. Khanna emailed her a response. 11 Among other things, he stated: "I hope over the years I will be able to earn your trust." 58 12 K. The Anonymous Release of a Document Containing Confidential, Proprietary 13 Information Belonging to Mike Honda for Congress 14 On Dec. 16, 2015, San Jose *Inside* published, online, a document containing confidential 15 information of donors to Mike Honda for Congress.⁵⁹ That document included the donors' 16 names, preferred nicknames, employer information, personal telephone numbers, and preferred 17 nicknames. 60 According to *Inside*, that document had "arrived in the mail" from an anonymous 18 source in early December 2015.61 19 L. The Discovery of the Data Breach 20 On May 31, 2016, Randy Broz, the fundraising consultant for Mike Honda for Congress, 21 22 23 55 Gowani Decl. Exh. 1 (italics added). 24 56 Gowani Decl. Exh. 1 (italics added). 57 Bertelsen Decl. ¶10 & Exh. 1. 25 58 Bertelsen Decl. ¶11 & Exh. 1. 26 59 Beckendorf Decl. ¶16 & Exh. 4. 27 60 Beckendorf Decl. ¶16 & Exh. 4. Beckendorf Decl. ¶17 & Exh. 4. 28

received a notification from Dropbox that files in the "Honda" folder had been modified.⁶² In response, Sudip Dutta, then the Finance Director of Mike Honda for Congress, sent an email to Arum Group's Madalene Mielke, the previous fundraising consultant for Mike Honda for Congress, to inquire about those Dropbox files.⁶³

Ms. Mielke sent an email to Mr. Dutta that same day. In that email, Ms. Mielke stated that (1) Defendant Parvizshahi had previously been an intern for Arum Group, (2) Defendant Parvizshahi had not been previously removed from the Dropbox access list with respect to the files of Mike Honda for Congress, and (3) upon discovering that inadvertent oversight, she had removed Defendant Parvizshahi's name from the Dropbox access list.⁶⁴

Subsequently, Michael Beckendorf, Campaign Manager of Mike Honda for Congress, requested access to the file from Ms. Mielke; and she provided him with access to the files in Dropbox. Mr. Beckendorf began to examine the Honda Folders to determine what information had been exposed.⁶⁵

In so doing, Mr. Beckendorf found that many files within the Honda Folders had timestamps noting that Defendant Parvizshahi had accessed and made edits to those files after he had left Arum Group, LLC and throughout the time when he was working for Ro for Congress, *Inc.* 66

That same day (May 31, 2016), Mr. Beckendorf contacted Robert Eberhardt, Mike Honda for Honda's opposition researcher, to assist in assessing the nature of information that had been compromised. For this purpose, Mr. Eberhardt was given access to the Honda Folders.⁶⁷ Mr. Beckendorf also asked Vedant Patel, Communications Director to Mike Honda for Congress, to

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⁶² Beckendorf Decl. ¶18 & Exh. 2.

⁶³ Beckendorf Decl. ¶19 & Exh. 2.

⁶⁴ Mielke Decl. ¶¶39, 40 & Exh. 2.

⁶⁵ Beckendorf Decl. ¶21.

⁶⁶ Beckendorf Decl. ¶22.

⁶⁷ Beckendorf Decl. ¶23.

1 assist in assessing the scope of the data breach.⁶⁸ 2 It became clear to Mike Honda to Congress that Defendant Parvizshahi had begun 3 accessing confidential information belonging to Mike Honda for Congress after leaving Arum 4 Group, and had continued accessing that information while working for Ro for Congress, Inc. ⁶⁹ 5 After examining the Honda Folders, Mr. Beckendorf also discovered that a spreadsheet 6 entitled "2012 2010 Crane Club Cycle Report.xls" matched perfectly with the donor document 7 that had been anonymously provided to – and published by – San Jose *Inside* on Dec. 16, 2015.⁷⁰ 8 In response, Mr. Beckendorf promptly notified Rep. Honda that Defendant Parvizshahi 9 had obtained access to the confidential, proprietary information of Mike Honda for Congress.⁷¹ 10 In addition, Mr. Beckendorf sent an email to his Campaign Team at 4:48 pm on May 31, 2016. In 11 that email, Mr. Beckendorf notified the following members of Mike Honda for Congress that 12 Defendant Parvizshahi had obtained access to the campaign's sensitive donor information: 13 Vedant Patel (Communications Director); Raghu Devaguptpu and Rachel Irwin (AL Media); 14 Adnaan Muslim and Mara Kunin (Mission Control, Inc.); David Mermin (Lake Research 15 Partners); Robert Eberhardt (Stanford Caskey); and Mike Nellis and MaryCate Brower 16 (Revolution Messaging).⁷² 17 In that email (at p.2), Mr. Beckendorf notified his Campaign Team that a significant 18 amount of our campaign's confidential fundraising had been compromised: 19 Rob[ert Eberhardt] is currently through all the information that was 20 exposed to the Khanna campaign leading [up to] [20]15. Safe to say that had access to EVERYTHING last cycle. 73 21 Shortly thereafter, Mr. Beckendorf received an email from Robert Eberhardt, Mike Honda 22 for Congress' Opposition Researcher. In that email, Mr. Eberhardt stated: "Yeah, as Michael 23 24 68 Beckendorf Decl. ¶24. 69 Beckendorf Decl. ¶25. 25 70 Beckendorf Decl. ¶26. 26 71 Honda Decl. ¶¶17, 18. 27 72 Beckendorf Decl. ¶28. 73 Beckendorf Decl. ¶29 & Exh. 1 (capitalization in original). 28

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1 [Beckendorf] said, it looks like *everything* related to Mike Honda's fundraising over the last years is in this folder that Brian [Parvizshahi] had access to."⁷⁴ Among other things, Mr. Eberhardt 2 3 stated that the Honda Folders contained personal contact information of the campaign's large-4 dollar and small-dollar donors.⁷⁵ The Donor Document Entitled "030514 MH contribution 2008-2014.xls" 5 M. 6 As mentioned earlier, on Mar. 7, 2014 Defendant Parvizshahi "edited" and "added" a 7 donor file entitled "030514 MH contribution 2008-2014.xls" (hereinafter, the "Donor 8 Document"):76 030514 MH Contribution 2008-2014.xls 9 Brian Parvizshahi edited on March 7, 2014 10 March 7, 2014 11 BrianParvi-PC 12 030514 MH Contribution 20... • 11:11 PM Added by Brian Parvizshahi. • Desktop 13 The Donor Document contains detailed donor information from 2008 to 2014, including 14 but not limited to: date of donation, amount, contact name, employer, occupation, city and state 15 of residence, email, phone numbers.⁷⁷ As the first page of the document (at top left) shows, the 16 Donor Document provides detailed information with respect to donations totaling to 17 \$3,500,594.11.78 In that regard, the Donor Document contained 9793 entries of confidential 18 donor information, including that of the six supporters mentioned earlier: Garnetta Annable, Judy 19 Bertelsen, Kalyn Free, Fayzan Gowani, Bob Hasegawa, and Dale Minami.⁷⁹ 20 N. The Harm Caused by the Data Breach and Defendant Khanna's Accosting of Mike 21 Honda for Congress Supporters: Assessment Costs 22 23 74 Italics added. 24 75 Beckendorf Decl. ¶31. 25 76 Eberhardt Decl. ¶23. 77 Eberhardt Decl. ¶25. 26 78 Eberhardt Decl. ¶26.

Eberhardt Decl. ¶¶24, 25, 29 (listing the pages of Eberhardt Decl. Exh. 1 where the names

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of the six supporters appear) & Exh. 1.

1	Mike Honda for Congress has suffered severe harm that was directly caused by the data
2	breach and Defendant Khanna's solicitation of our donors. Among other things, Mike Honda for
3	Congress was forced to spend \$5,109.36 in order to assess the extent to which the Honda Folders
4	had been compromised. ⁸⁰
5	Specifically, Mr. Beckendorf devoted 60 hours (at his hourly rate of \$53.12) conducting
6	and compiling research, participating in conference calls, coordinating team strategy, and
7	reaching out to donors. That amount totaled to \$3,187.50. Mike Honda for Congress' Opposition
8	Researcher Robert Eberhardt devoted 15 hours (at his hourly rate of \$100) conducting and
9	compiling research and participating in conference calls. That amount totaled to \$1,500.00.
10	Mike Honda for Congress' Communications Director Vedant Patel devoted 15 hours (at his
11	hourly rate of \$28.12) conducting and compiling research, participating in conference calls, and
12	developing press and communications strategy. That amount totaled to \$421.86.81
13	O. The Harm Caused by the Data Breach and Defendant Khanna's Accosting of Mike
14	Honda for Congress Supporters: Harm to Rep. Honda's Relationship with
15	<u>Supporters</u>
16	When it comes to fundraising, Rep. Honda abides by a simple rule: As a matter of
17	respect, one should never solicit supporters of his or her opponent. ⁸² Because it is costly to
18	campaign across a highly populated metropolitan area, it is critical for not only to convince
19	supporters to donate, but to encourage them to continue to donate up to the legally allowed
20	limit. ⁸³
21	The data breach into Mike Honda for Congress' confidential, proprietary information has
22	already irreparably harmed it in at least three serious ways. First, its supporters were harassed
23	and intimidated, for Defendant Khanna accosted them at a place that they had least expected:
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25	80 Reakanderf Deel ¶22
26	Deckelidori Deci. #33.
27	Deckendon Deci. 34-30.
27	Honda Decl. ¶13.

NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION

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Beckendorf Decl. ¶9.

their email inbox.⁸⁴ In response, some donors may have reduced – or stopped altogether – their financial support for Mike Honda for Congress.⁸⁵

Second, the data breach into confidential, proprietary information has compromised Rep. Honda's relationships with supporters – which, in many cases, he has cultivated for years. ⁸⁶

Third, the data breach personally embarrassed Rep. Honda and harmed his reputation. ⁸⁷ Not only were his supporters subjected to Mr. Khanna's attacks upon Rep. Honda, but the disclosure of confidential, proprietary information from the Honda Folders also resulted in adverse publicity for Rep. Honda. ⁸⁸

P. Defendants Have Directly Benefited from Their Wrongdoing

Each Defendant has directly benefited from their wrongdoing. Defendant Parvizshahi parlayed his illegal access to the Honda Folders into his current, well compensated position as Campaign Manager in a high-profile Congressional race. Defendant Ro for Congress, Inc. and Defendant Khanna used Honda for Congress' confidential, proprietary information not only to harass and intimidate Mike Honda for Congress supporters, but to harm Congressmember Honda's reputation and political standing.

IV. Legal Analysis: Overview

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Mike Honda for Congress must be granted a preliminary injunction, because its claims abundantly satisfy four essential requirements: (1) it is likely to succeed on the merits, (2) without a preliminary injunction, is likely to suffer irreparable harm, (3) the balance of equities tips in its favor, and (4) an injunction "is in the public interest". The Ninth Circuit employs a sliding-scale analysis when examining a plaintiff's likelihood of success on the merits. Namely,

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84 Honda Decl. ¶¶15, 16.
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Beckendorf Decl. ¶39.

Honda Decl. ¶20.

Honda Decl. ¶21.

Beckendorf Decl. ¶38.

Beckendorf Decl. ¶8 & Exh. 2.

Honda Decl. ¶21.

⁹¹ Winter v. NRDC, 129 S.Ct. 365, 374 (2008) (quoted by Alliance for the Wild Rockies v. Cottrell, 632 F.3d 1127, 1131 (9th Cir. 2011) (en banc).

1 a preliminary injunction is "appropriate" if (1) the balance of hardships tips "sharply" in the 2 plaintiff's favor, and (2) the plaintiff raises "serious questions going to the merits". 92 3 IV. Mike Honda for Congress Is Likely To Succeed on the Merits 4 Mike Honda for Congress is likely to succeed on the merits for two reasons. *First*, 5 Defendant Parvizshahi and Defendant Ro for Congress, Inc. (as Defendant Parvizshahi's 6 employer) repeatedly violated three provisions of the CFAA: 18 U.S.C. §§1030(a)(2)(C) [theft of 7 computer data], 1030(a)(4) [unauthorized access with intent to defraud], and 1030(a)(5) 8 [unauthorized access resulting in damage to computer]. Second, all three Defendants 9 (Parvizshahi, Ro for Congress, Inc., and Khanna) violated 18 U.S.C. §1030(b), for they engaged 10 in a conspiracy to violate the provisions of Sections 1030(a)(2)(C), 1030(a)(4), and 1030(a)(5). 11 V. **Three Overlapping CFAA Issues** 12 We will first address three common overlapping issues under all three CFAA provisions: 13 A. Defendant Ro for Congress, Inc. Is Vicariously Liable for Defendant Parvizshahi's CFAA Violations 14 15 As a starting point, Defendant Ro for Congress, Inc. is vicariously liable for Defendant 16 Parvizshahi's CFAA violations. "[C]ourts have held that an employer can be vicariously liable for an employee's violations of the CFAA if those transgressions occur in the scope of 17 *employment* or the employer directs the employee's conduct."93 18 19 Here, as we have shown, Defendant Parvizshahi has been employed by Defendant Ro for 20 Congress, Inc. since January 2014. During his employment with Defendant Ro for Congress, 21 Inc., Defendant Parvizshahi "added", "edited" or otherwise modified Mike Honda for Congress' 22 confidential, proprietary information on Dropbox at least 44 times. In so doing, Defendant 23 Parvizshahi accessed confidential information from the Donor Document, and disseminated that 24 information to Defendants Ro for Congress, Inc. and Defendant Khanna. As a direct result, Mike 25 Honda for Congress supporters such as Fayzan Gowani were accosted by Defendant Khanna over 26 92 Cottrell, supra, 632 F.3d at 1134-35 (emphases added). 27

(italics added).

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Netapp, Inc. v. Nimble Storage, Inc., 41 F.Supp.3d 816, 835 (N.D. Cal. 2014) (Koh, J.)

NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION

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email. Because Defendant Parvizshahi violated the CFAA in the scope of his employment, his employer (Defendant Ro for Congress, Inc.) is vicariously liable under the CFAA.

В. Plaintiff Satisfies the CFAA's "Without Authorization" or "Exceeding Authorized Access" Requirement

Mike Honda for Congress satisfies CFAA Sections 1030(a)(2), 1030(a)(4), and 1030(a)(5)'s requirement that the perpetrator of the offense (a) had no "authorization" to access the confidential data or (b) "exceeded his or her authorized access" when he or she accessed the confidential data. As this Court recently held in *NetApp v. Nimble Storage*, the CFAA flatly bans a former employee from continuing to access his former employer's confidential information – even if his or her access is inadvertently not withdrawn. 94 The Court likened that situation to where "a houseguest receives a key, is then told he is no longer welcome but keeps the key, and the homeowner neglects to change the lock."95 Thus, if a former employer accesses such information after his employment concludes, he or she has acted "without authorization" and "exceed[ed] authorized access" as a matter of law.

The facts here exactly mirror those of *Netapp*. After leaving Arum Group, Defendant Parvizshahi's access to the Arum Group's Dropbox account was inadvertently not withdrawn. Nevertheless, he continued to repeatedly access the Honda Folders on the Arum Group's Dropbox account after leaving Arum Group and after becoming an employee of Defendant Ro for Congress, Inc. Accordingly, both Defendant Parvizshahi and his employer (Defendant Ro for Congress, Inc.) acted "without authorization" and "exceed[ed] authorized access" when they repeatedly accessed the confidential, proprietary information of Mike Honda for Congress.

C. Plaintiff Satisfies the CFAA's Loss/Damage Requirement

Furthermore, Mike Honda for Congress satisfies the CFAA's loss/damage requirement.

Netapp, supra, 41 F.Supp.3d 816, 831-34 (N.D. Cal. 2014) (Koh, J.); see also Weingand v. Harland Financial Solutions, Inc., 2012 WL 2327660 (N.D. Cal. June 19, 2012).

Netapp, supra, 41 F.Supp.3d at 832 (italics added). Plaintiff also satisfies the CFAA's "protected computer" requirement, for Defendant Parvizshahi accessed Arum Group's Dropbox account by engaging in "conduct involv[ing] interstate or foreign communication": namely, using the internet. See Shurgard Storage Centers, Inc. v. Safeguard Self Storage, Inc., 119 F.Supp.2d 1121, 1125 (W.D. Wash. 2000).

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To bring a civil action under the CFAA, a plaintiff must show that the alleged violations caused "damage" or a "loss" of at least \$5,000.⁹⁶ *First*, Mike Honda for Congress satisfies CFAA's requirement with respect to "loss".

The CFAA defines loss as "any reasonable cost to any victim, including the *cost of responding* to an offense[.]" As the Fourth Circuit and this Court have held, the "cost of investigating and identifying the CFAA, including many hours of valuable time away from day-to-day responsibilities" qualifies as the cost of responding to a CFAA offense, provided that the response costs totaled to at least \$5000.98

Here, as shown earlier, Mike Honda for Congress was forced to shift its Campaign Manager, Opposition Researcher, and Press Secretary to investigate and identify the CFAA violation: namely, the data breach that was discovered on May 31, 2016. Because the response costs for that effort totaled to \$5,109.36, Mike Honda for Congress satisfies the CFAA's \$5,000 floss" requirement.

Second, Mike Honda for Congress satisfies CFAA's requirement with respect to "damage". It is settled law that the misappropriation of trade secrets or confidential information suffices to establish the \$5,000 jurisdictional threshold, for misappropriation impairs the integrity of such data or information.⁹⁹

Here, it is beyond dispute that Defendant Parvizshahi misappropriated Mike Honda for Congress' confidential, proprietary information. Specifically, Defendant Parvizshahi "added" a number of Dropbox files in the Honda Folders. As shown earlier, Dropbox files labeled as "added" are the most interesting. If the "added" file had existed *before* the "added" action was taken, it means that someone had removed the file to another location (e.g., his or her desktop) –

⁹⁶ E.g., A.V. ex rel. Vanderhye v. iParadigms, LLC, 562 F.3d 630, 646 (4th Cir. 2009) (citing 18 U.S.C. §1030(g) & (a)(5)(B)(i)).

^{97 18} U.S.C. §1030(e)(11).

iParadigms, supra, 562 F.3d at 646 (citing with approval SuccessFactors, Inc. v. Softscape, Inc., 544 F.Supp.2d 975, 980-81 (N.D. Cal. 2008)).

E.g., Four Seasons Hotel & Resorts BV v. Consorcio Barr, SA, 267 F.Supp.2d 1268, 1324
 (S.D. Fla. 2003); Shurgard, supra, 119 F.Supp.2d at 1126-27.

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1	and then moved the file back to the shared location within the Dropbox account. 100
2	As shown earlier, Defendant Parvizshahi "added", "edited", or in some way modified
3	individual documents at least 44 times during his employment with Ro Khanna for Congress.
4	What is more, Defendant Parvizshahi disseminated the misappropriated information to Defendant
5	Khanna and Defendant Ro for Congress, Inc. Indeed, one of the documents that had existed
6	before it was "added" by Defendant Parvizshahi – the Donor Document – contained the email
7	addresses of all six Honda for Congress declarants that Defendant Khanna had accosted by email:
8	Garnetta Annable, Judy Bertelsen, Kalyn Free, Fayzan Gowani, Bob Hasegawa, and Dale
9	Minami. Because Defendant Parvizshahi misappropriated its confidential, proprietary
10	information, Mike Honda for Congress meet the CFAA's damage requirement as a matter of law.
11	VI. Defendants Parvizshahi and Ro for Congress, Inc. Violated CFAA Section
12	1030(a)(2)(C) [Theft of Computer Data]
13	Defendant Parvizshahi and (through vicariously liability) Ro for Congress, Inc. violated
14	CFAA Section 1030(a)(2)(C), which bans the theft of computer data. Under that provision,
15	"[w]hoever intentionally accesses a computer without authorization or exceeds authorized
16	access, and thereby obtains information from any protected computer if the conduct involved
17	an interstate or foreign communication shall be punished". 101
18	As shown above, Defendant Parvizshahi repeatedly accessed and misappropriated Mike
19	Honda for Congress' confidential, proprietary information after leaving Arum Group and joining
20	Defendant Ro for Congress, Inc. Accordingly, both he and Ro for Congress, Inc. are liable under
21	Section 1030(a)(2)(C).
22	VII. Defendants Parvizshahi and Ro for Congress, Inc. Violated CFAA Section 1030(a)(4)
23	[Unauthorized Access with Intent to Defraud]
24	In addition, Defendant Parvizshahi and (through vicariously liability) Ro for Congress,
25	Inc. violated CFAA Section 1030(a)(4), which bans accessing a computer with "intent to
26	defraud". As this Court has made clear, "fraud" under the CFAA "only requires a showing of
27	100 O'Day Decl. ¶¶25-27.
28	¹⁰¹ Shurgard, supra, 119 F.Supp.2d at 1124.

1 unlawful access; there is *no need* to plead the elements of common law fraud[.]"¹⁰² 2 As shown above, Defendant Parvizshahi unlawfully Mike Honda for Congress' 3 confidential, proprietary information after leaving Arum Group and joining Defendant Ro for 4 Congress, Inc. Accordingly, both he and Ro for Congress, Inc. are liable under Section 5 1030(a)(4). 6 VIII. Defendants Parvizshahi and Ro for Congress, Inc. Violated CFAA Section 1030(a)(5) 7 [Unauthorized Access Resulting in Damage to Computer] 8 Defendants Parvizshahi and (through vicarious liability) Ro for Congress, Inc. also 9 violated CFAA Section 1030(a)(5), which bans accessing a computer, without authorization, that results in "damage". 103 As we have shown. Mike Honda for Congress can show that it suffered 10 11 damage, for Defendant Parvizshahi misappropriated its confidential, proprietary information. 12 Moreover, as we have shown, Defendant Parvizshahi accessed Arum Group's Dropbox account 13 without authorization as a matter of law, for he accessed the Dropbox account after his 14 employment with Arum Group had ended. Therefore, Defendants Parvizshahi and Ro for 15 Congress, Inc. violated CFAA Section 1030(a)(5). 16 IX. Defendants Parvizshahi, Ro for Congress, Inc., and Khanna Are Liable for 17 Conspiracy [CFAA Section 1030(b)] 18 Finally, Defendant Parvizshahi, Defendant Ro for Congress, Inc., and Defendant Khanna 19 are liable for conspiracy under CFAA Section 1030(b). To show a conspiracy under the CFAA, a 20 plaintiff must show that "defendants reached some explicit or tacit understanding or agreement." Here, beginning approximately January 2014, Defendant Parvizshahi, Defendant 21 22 Ro for Congress, Inc., and Defendant Khanna had an understanding, whereby (1) Defendant 23 Parvizshahi obtained Mike Honda for Congress' confidential, proprietary information from the 24 Arum Group's Dropbox account, and (2) all three Defendants used that information for their 25 102 *Netapp, supra*, 41 F.Supp.3d at 833 (italics added). 26 103 Shurgard, supra, 119 F.Supp.2d at 1126. 27

Alfus v. Pyramid Tech. Corp., 745 F.Supp. 1511, 1521 (N.D. Cal. 1990) (quoted by Netapp, supra, 41 F.Supp.3d at 836).

benefit and to the detriment of Mike Honda for Congress, Inc.

Among other things, that collaboration between the Defendants enabled them to create what Defendant Khanna called a "friends list" – one that consists of supporters of Mike Honda for Congress. In that regard, Defendant Khanna personally responded to inquiries from Mike Honda for Congress supporters regarding the "friends list"; and, as needed, directed Defendant Parvizshahi to remove certain Mike Honda for Congress supporters (like Fayzan Gowani) from the "friends list". Because they had – and demonstrably acted on – an understanding to jointly engage in conduct that violated the CFAA, all Defendants are liable for conspiracy under Section 1030(b).

X. Mike Honda for Congress Continues to Suffer Irreparable Harm

Mike Honda for Congress has already suffered irreparable harm – and will continue to suffer irreparable harm – unless it is granted a preliminary injunction. An injunction is called for if wrongdoing has harmed one's reputation or resulted in the loss of goodwill. The illegal data breach perpetrated by Defendants has already personally embarrassed Rep. Honda, compromised his relationship with supporters, and harmed his reputation. Unless an injunction issues against them, Defendants will *continue* to use the information that they illegally obtained for their own benefit and to Rep. Honda's detriment.

XI. The Balance of Hardships Tips Sharply in Mike Honda for Congress' Favor

With the general election looming, the balance of hardships tips sharply in Mike Honda for Congress' favor. "It is obvious that compliance with the law is in the public interest." Unless an injunction is granted, Defendants will continue to reap political and economic benefits from violating the CFAA. Therefore, there can be no question that the balance of hardships tips sharply in Mike Honda for Congress' favor.

VII. Plaintiffs Are Entitled to a Preliminary Injunction

This brief has painstakingly shown that Mike Honda for Congress is entitled to a

⁰⁶ N.D. v. Haw. Dep't of Educ., 600 F.3d 1104, 1113 (9th Cir. 2010).

E.g., YourNetDating, LLC v. Mitchell, 88 F.Supp.2d 870 (N.D. Ill. 2000); Southeastern Mechanical Svcs., Inc. v. Broday, No. 08-CV-01151, 2008 BL 232599 (M.D. Fla. Oct. 15, 2008).

1	preliminary injunction. First, it is not just "likely", but certain that it will prevail on the merits.	
2	Second, Mike Honda for Congress continues to suffer irreparable harm. Finally, the balance of	
3	hardships tip sharply in its favor – a critical circumstance to which the Ninth Circuit pays special	
4	heed. 107 Finally, the public will greatly benefit from injunctive relief, for Defendants will be	
5	ordered to stop violating federal law. For all these reasons, the Court must grant Mike Honda for	
6	Congress swift, injunctive relief.	
7	VIII. Conclusion	
8	Laws must be honored, not broken. In light of Defendant Parvizshahi, Defendant Ro for	
9	Congress, Inc., and Defendant Khanna's deliberate, repeated, and shameful wrongdoing, Mike	
10	Honda for Congress respectfully asks the Court to swiftly grant all appropriate injunctive relief.	
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13	DATED: Sept. 22, 2016	
14	D (CH 1 : W 1	
15	Respectfully submitted,	
16	Dev. /a/Castana Datta	
17	By: /s/ Gautam Dutta GAUTAM DUTTA, ESQ.	
18	Attorneys for Plaintiff	
19	MIKE HONDA FOR CONGRESS	
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27	107 Cottrell supra 632 F 3d at 1134-35 (emphases added)	
28	Cottrell, supra, 632 F.3d at 1134-35 (emphases added).	

1 2 3 4 5 6	BUSINESS 5655 Silver San Jose, C Telephone: Email: <u>Du</u>	atta, Esq. (State Bar No. 199326) S, ENERGY, AND ELECTION Lar Creek Valley Rd # 900 CA 95138 415.236.2048; Fax: 213.405.241 tta@BusinessandElectionLaw.com for Plaintiff NDA FOR CONGRESS	16
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8			ES DISTRICT COURT
9		NORTHERN DISTRICT OF C.	ALIFORNIA, SAN JOSE DIVISION
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11	MIKE HO	NDA FOR CONGRESS,	CASE NO.
12		Plaintiff,	JUDGE: TBD
13	VS.		DECLARATION OF MICHAEL M. "MIKE" HONDA IN SUPPORT
14	BRIAN PA	ARVIZSHAHI, et al.	OF PLAINTIFF'S MOTION FOR PRELIMINARY
15		Defendants.	INJUNCTION
16			Hearing Date: TBD
17 18	I, Mike Hon	da, declare as follows:	
19		MY BACK	GROUND
20	1.	I am the Representative for Cal	ifornia's 17 th Congressional District, which covers
		portions of Santa Clara and Ala	ameda Counties.
21	2.	I submit this Declaration in my	capacity as a candidate for federal office. My
22	campaign committee, Mike Honda for Congress, is the Plaintiff in this litigation.		
23	3. When I was a child, my family was forced to stay at an internment camp because		
24		we were Japanese American.	
25	4.	After World War II, I spent the	rest of my childhood in San Jose.
26	5.	I earned my Bachelor's and Ma	ster's degrees from San Jose State University.
27 28	6.	I have also served in the U.S. P	eace Corps in El Salvador, where I became fluent
			HONDA DECLARATION

in Spanish.

- 7. My professional career began as a schoolteacher and principal.
- 8. Prior to my election to the U.S. House of Representatives in 2000, I served in the California State Assembly, Santa Clara County Board of Supervisors, San Jose Unified School Board, and San Jose Planning Commission.
- 9. As Congressmember, I am a meber of the House Committee on Appropriations, serving on two Appropriations Subcommittees: the Subcommittee on Commerce, Justice, Science, and Related Agencies, and the Subcommittee on Energy and Water Development, and Related Agencies.

THE INVASION OF MY DONORS' PRIVACY

- It costs millions of dollars to mount a Congressional campaign in a metropolitan area like Silicon Valley.
- In my experience, the vast majority of our donations comes from previous donors.

 I am proud that many of our supporters give what they can, and donate modest amounts such as \$20 or \$30.
- 12. For this compelling reason, we must not only convince our supporters to donate, but to encourage them to *continue* to donate up to the legally allowed limit.
- 13. When it comes to fundraising, I abide by a simple rule: As a matter of respect, one should never solicit supporters of my opponent.
- 14. My campaign had previously used Arum Group, LLC as its fundraising consultant.
- 15. In early October 2015, I was informed by my Campaign Manager Michael Beckendorf that Ro Khanna had directly solicited a number of my campaign's donors by directly emailing them.
- 16. I was deeply disturbed to learn that my donors were being solicited and pressured by my opponent.
- 17. On May 31, 2016, I was informed by Mr. Beckendorf that several files in Arum Group's Dropbox account containing our campaign's confidential donor

1		information had been compromised.
2	18.	Mr. Beckendorf also informed me that the Brian Parvizshahi, who currently serves
3		as Mr. Khanna's Campaign Manager, had continuously been accessing my
4		campaign's confidential donor files through last year.
5	19.	My supporters expect – and deserve – to have their confidentiality and privacy
6		respected.
7	20.	The data breach into my campaign's confidential donor files has compromised my
9		relationships with my donors – which, in many cases, I have cultivated for years.
10	21.	Our donors are people who have put their trust in me. The use of their private,
11		confidential contact and financial information – and their unexpected contact with
12		Mr. Khanna – has been upsetting to them. What is more, it has personally
13		embarrassed me and harmed my reputation.
14	22.	Mr. Khanna, his campaign, and campaign manager have already used our
15		confidential information to solicit and pressure our donors.
16	23.	We ask the Court to issue a preliminary injunction to stop them from <i>continuing</i> to
17		do so before the November election.
18	I deals	are under penalty of perjury that the foregoing is true and correct. Executed on Sept.
19	19, 2016.	are under penalty of perjury that the foregoing is true and correct. Executed on sept.
20	17, 2010.	By: /s/ Michael M. "Mike" Honda
21		MICHAEL M. "MIKE" HONDA
22		
23		
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27		
28		HONDA DECLARATION
		HONDA DECLARATION

1 2 3 4	Gautam Dutta, Esq. (State Bar No. 199326) BUSINESS, ENERGY, AND ELECTION LAW, PC 5655 Silver Creek Valley Rd # 900 San Jose, CA 95138 Telephone: 415.236.2048; Fax: 213.405.2416 Email: Dutta@BusinessandElectionLaw.com		
5	Attorneys for Plaintiff MIKE HONDA FOR CONGRESS		
6			
7			
8	UNITED STATE	ES DISTRICT COURT	
9	NORTHERN DISTRICT OF C	ALIFORNIA, SAN JOSE DIVISION	
10			
11	MIKE HONDA FOR CONGRESS,	CASE NO.	
12	Plaintiff,	JUDGE: TBD	
13	VS.	DECLARATION OF MICHAEL T. BECKENDORF IN SUPPORT	
14	BRIAN PARVIZSHAHI, et al.	OF PLAINTIFF'S MOTION FOR PRELIMINARY	
15	Defendants.	INJUNCTION	
16		Hearing Date: TBD	
17			
18	I, Michael T. Beckendorf, declare as follows:		
19	MY BACK	GROUND	
20		or Mike Honda for Congress, and have served in this	
21		we worked as a Campaign Manager and other senior	
22	positions for a number of campaigns at the federal, statewide, and state levels.		
23	2. I earned my bachelor's degree in Political Science and Government from the		
24	University of Central Arkansas		
25	3. I am not a party in this action.	I make this declaration of my own personal	
26	knowledge, and, if called as a v	vitness, I could and would testify competently to the	
27	truth of the matters set forth he	rein.	
28			
		RECKENDORE DECLARATION	

THE RACE FOR CONGRESSIONAL DISTRICT 17

- 4. Congressmember Mike Honda represents California's 17th Congressional District, an area that comprises a core part of Silicon Valley: Cupertino, Sunnyvale, Santa Clara, Milpitas, Newark, and parts of San Jose and Fremont.
- 5. In 2004, Ro Khanna unsuccessfully ran for the U.S. House of Representatives against the late Congressmember Tom Lantos, who represented San Mateo County and a part of San Francisco County.
- 6. In 2014, Mr. Khanna unsuccessfully challenged Congressmember Honda for his current seat.
- Because they were the top two finishers in California's June 7, 2016 "Top Two"
 Primary, Congressmember Honda and Ro Khanna advanced to the Nov. 8, 2016 general election.
- 8. Currently, Brian Parvizshahi is the Campaign Manager of Ro Khanna's campaign. According to his LinkedIn profile, he joined the Khanna campaign as Data Director in January 2014, and became campaign manager last year. A true and accurate copy of Mr. Parvizshahi's LinkedIn profile¹ has been attached as Exhibit 2.

RO KHANNA'S EMAIL SOLICITATION OF MIKE HONDA SUPPORTERS

- 9. Because it is costly to campaign across a highly populated metropolitan area, it is critical for our campaign not only to convince supporters to donate, but to convince them to *continue* to donate up to the legally allowed limit.
- 10. Beginning Saturday, Oct. 3, 2015, sixteen individuals contacted our campaign to report that Ro Khanna had directly solicited donors to our campaign by directly emailing them.
- Our campaign was forwarded copies of Mr. Khanna's emails, including one that
 Washington State Senator Bob Hasegawa had received on Saturday, Oct. 3, 2015

Downloaded from https://www.linkedin.com/in/brianparvi (last visited Sept. 17, 2016).

- from Mr. Khanna. A true and accurate copy of that email has been attached as Exhibit 2 to the accompanying Declaration of Bob Hasegawa.
- 12. In that email, Mr. Khanna asked if Senator Hasegawa "might have time for a call" to discuss his (Khanna's) race against Congressmember Honda.
- 13. In that same email, Mr. Khanna further stated that "Honda's ethics scandal has convinced many voters about the need for change." Mr. Khanna's email also contained, under the heading of "Recent Press", links to a number of articles that were critical of Congressmember Honda.
- 14. At the time, we did not know how Mr. Khanna and his campaign had obtained the names and current email addresses of our campaign's donors. Those items are the *lifeblood* of any successful fundraising (and political) campaign.
- 15. Based on my experience in political work, those sixteen individuals who contacted our campaign regarding Mr. Khanna's email were the tip of the iceberg. Namely, for every donor who contacted us, there were at least 50-100 donors who did *not* contact us.
- 16. On Dec. 16, 2015, San Jose *Inside* published, online, a document containing confidential information of donors to our campaign. That document included the donors' names, preferred nicknames, employer information, personal telephone numbers, and preferred nicknames.
- 17. According to *Inside*, that document had "arrived in the mail" from an anonymous source in early December. A true and accurate copy of the Dec. 16, 2015 *Inside* article² has been attached as Exhibit 4. A true and accurate copy of the published donor document³ (with confidential information redacted) has been attached as Exhibit 3.

Downloaded from http://www.sanjoseinside.com/2015/12/16/leaked-1000-cranes-list-links-congressman-mike-honda-to-pay-to-play-actions/ (last visited Sept. 17, 2016).

Downloaded from http://www.sanjoseinside.com/2015/12/16/leaked-1000-cranes-list-links-congressman-mike-honda-to-pay-to-play-actions/ (last visited Sept. 17, 2016).

THE DISCOVERY OF THE DATA BREACH

- 18. On May 31, 2016, Randy Broz, the fundraising consultant for Mike Honda for Congress, received a notification from Dropbox that files in the "Honda" folder had been modified.
- 19. In response, our then-Finance Director Sudip Dutta sent an email to Arum Group's Madalene Mielke, the previous fundraising consultant for Mike Honda for Congress, to inquire about those Dropbox files. A copy of that email has been attached as Exhibit 2 to the accompanying Declaration of Madalene Mielke.
- 20. In response, Ms. Mielke sent an email to Mr. Dutta that same day. In that email, Ms. Mielke stated that (1) Brian Parvizshahi had previously been an intern for Arum Group, (2) Brian Parvizshahi had not been previously removed from the Dropbox access list with respect to the files of Mike Honda for Congress, and (3) upon discovering that inadvertent oversight, she had removed Mr. Parvizshahi's name from the Dropbox access list. A copy of that email has been attached as Exhibit 2 to the accompanying Declaration of Madalene Mielke.
- 21. Subsequently, I requested access to the file from Ms. Mielke and she provided me with access to the files in Dropbox (hereinafter, the "Honda Folders"). I began to examine the Honda Folders to determine what information had been exposed.
- 22. In so doing, I found that many files within the Honda Folders had timestamps noting that Mr. Parvizshahi had accessed and made edits to those files after he had left Arum Group, LLC and *throughout the time when he was working for Ro Khanna for Congress*.
- 23. That same day (May 31, 2016), I contacted Robert Eberhardt of Stanford Caskey to assist in assessing the nature of information that had been compromised. For this purpose, Mr. Eberhardt was given access to the Honda Folders.
- 24. I also asked Mike Honda for Congress Communications Director Vedant Patel to assist in assessing the scope of the data breach.

- 25. It became clear to me that Mr. Parvizshahi had begun accessing our campaign's confidential information after leaving Arum Group, and had continued accessing our campaign's confidential information *while working for the Khanna campaign*.
- 26. After examining the Honda Folders, I also discovered that a spreadsheet entitled "2012 2010 Crane Club Cycle Report.xls" *matched perfectly* with the donor document (*attached as* Exhibit 3) that had been anonymously provided to and published by San Jose *Inside* on Dec. 16, 2015 (article *attached as* Exhibit 4). If requested, I would be glad to provide the Court with a copy of the unredacted donor document, under seal.
- 27. In response, I promptly notified Congressmember Honda that Mr. Parvizshahi had obtained access to our campaign's sensitive donor information.
- 28. In addition, I sent an email to our Campaign Team at 4:48 pm on May 31, 2016. In that email, I notified the following members of Mike Honda for Congress that Mr. Parvizshahi had obtained access to our campaign's sensitive donor information: Vedant Patel (Communications Director); Raghu Devaguptpu and Rachel Irwin (AL Media); Adnaan Muslim and Mara Kunin (Mission Control, Inc.); David Mermin (Lake Research Partners); Robert Eberhardt (Stanford Caskey); and Mike Nellis and MaryCate Brower (Revolution Messaging). A true and accurate copy of that email (with email addresses redacted) has been attached as Exhibit 1.
- 29. In that email (at p.2), I notified our Campaign Team that a significant amount of our campaign's confidential fundraising had been compromised:

Rob[ert Eberhardt] is currently through all the information that was exposed to the Khanna campaign leading [up to] [20]15.

Safe to say that had access to EVERYTHING last cycle.⁴

30. Shortly thereafter, I received an email from Robert Eberhardt, our campaign's

⁴ Capitalization in original.

opposition researcher. In that email, Mr. Eberhardt stated: "Yeah, as Michael
said, it looks like everything related to Mike Honda's fundraising over the last
years is in this folder that Brian [Parvizshahi] had access to." A true and accurate
copy of that email (with email addresses redacted) has been attached as Exhibit 1.

31. Among other things, Mr. Eberhardt stated that the Honda Folders contained personal contact information of the campaign's large-dollar and small-dollar donors.

THE HARM CAUSED BY THE DATA BREACH AND DONOR SOLICITATIONS: ASSESSMENT COSTS

- 32. Our campaign has suffered severe harm that was directly caused by the data breach and Ro Khanna's solicitation of our donors.
- 33. To begin with, our campaign was forced to spend \$5,109.36 in order to assess the extent to which the Honda Folders had been compromised.
- 34. Specifically, I devoted 60 hours (at my hourly rate of \$53.12) conducting and compiling research, participating in conference calls, coordinating team strategy, and reaching out to donors. That amount totaled to \$3,187.50.
- 35. Our opposition researcher Robert Eberhardt devoted 15 hours (at his hourly rate of \$100) conducting and compiling research and participating in conference calls.

 That amount totaled to \$1,500.00.
- 36. Our Communications Director Vedant Patel devoted 15 hours (at his hourly rate of \$28.12) conducting and compiling research, participating in conference calls, and developing press and communications strategy. That amount totaled to \$421.86.

THE HARM CAUSED BY THE DATA BREACH AND DONOR SOLICITATIONS:

HARM TO CONGRESSMEMBER HONDA'S RELATIONSHIP WITH DONORS

37. The data breach into our donor files has already irreparably harmed Congressmember Honda's campaign in at least two troubling ways.

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⁵ Italics added.

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- 38. *First*, our supporters were harassed and intimidated, for Mr. Khanna sent his solicitation to a place that they had least expected: their email inbox. In response, some donors may have reduced or stopped altogether their financial support for our campaign.
- 39. *Second*, the data breach directly harmed Congressmember Honda's reputation.

 Not only were our supporters subjected to Mr. Khanna's attacks on

 Congressmember Honda, but the disclosure of confidential information from the

 Holder Folders (e.g., the donor document published by San Jose *Inside*) also

 resulted in adverse publicity for Congressmember Honda.
- 40. Unless all Defendants are ordered to return and stop using all information obtained from the data breach, Congressmember Honda's campaign will continue to suffer irreparable harm.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 20, 2016.

By: <u>/s/ Michael Beckendorf</u>
MICHAEL BECKENDORF

EXHIBIT 1

From: Robert Eberhardt < REDACTED>

Subject: Re: Data Breach

Date: May 31, 2016 at 3:24:10 PM PDT **To:** Michael Beckendorf < REDACTED>

Cc: David Mermin < REDACTED >, Rachel Irwin < REDACTED >, Mara Kunin

<REDACTED>, Adnaan Muslim <REDACTED>, Mike Nellis <REDACTED>, Vedant Patel < REDACTED >, MaryCate Brower < REDACTED >, Raghu Devaguptapu < REDACTED >

Yeah, as Michael said, it looks like everything related to Mike Honda's fundraising over the last years is in this folder that Brian had access to. A sampling of what sort of stuff is in here:

- "Crane club 2012 Contributions.pdf" with info on \$1,000+ donors.
- "\$1k club"
- Call lists, Incredibly detailed call sheets and notes
- Detailed call notes on Honda calls to previous Ro donors
- Detailed notes on Jennifer's attempts reaching out to prospective donors
- Detailed memos on tons of Honda events from 2011-14
- Fundraising talking points
- Detailed info on campaign finance breakdowns from PACs, industries, comparisons over different cycles
- Personal contact info not only for the Crane donors, but even quite a bit on small dollar donors (NGP type data)
- Info on lobbyists hosting an event
- Member soliciation letters, call notes
- Contact info, notes on Obama bundlers
- Info on Ro max donors
- Thank you letter to bundlers
- Mike and Jennifer's credit card info, some flight itineraries
- one-pagers on Mike's accomplishments, Mike Honda narrative, fundraising talking points
- Palm cards
- Direct mail invoices and receipts
- Invites to a number of events

On Tue, May 31, 2016 at 4:48 PM, Michael Beckendorf < <u>REDACTED</u>> wrote: Team Honda,

We learned today that there has been a major data breach of Congressman Honda's finance data up until early 2015.

Here is the background - last cycle the campaign employed Madalene Mielke of the Arum group as the PAC & DC fundraiser. In the summer of '12 - Brain Parvi was an intern at the Arum Group. He was given full access to Congressman Honda's dropbox at the that time.

Case 5:16-cv-05416 Document 5-20 Filed 09/22/16 Page 3 of 5

Fast forward to '14 - Brian no longer interns for Arum Group and is now employed by the Khanna campaign as their Data Director. His access to Mike's files via Dropbox was never revoked. In fact - we have timestamps of him accessing and editing files while he worked for Ro in '14.

At the end of '14 the campaign splits with the Arum group and hires ABC (our current PAC fundraiser) they are shared on this folder.

Madeleine made edits to a document today and ABC got an email about the update. Upon reaching out to Madaene - she informed the campaign that Brian had access to the files and has now been removed.

I have screenshots of Brian accessing files in '14 and no doubt he downloaded all of them last cycle.

This might also explain the "anonymous" 1000 cranes list that the San Jose Inside published - http://www.sanjoseinside.com/wp-content/uploads/2015/12/Mike-Honda-1000-Cranes-List-Redacted.pdf

It matches perfectly with a spreadsheet titled "2012 2010 Cranes Club" in the dropbox.

Rob is currently going through all the information that was exposed to the Khanna campaign leading put to 15.

Safe to say they had access to EVERYTHING last cycle.

Michael Beckendorf Campaign Manager

Campaign Manager



091011 Chicago host cmte targets.xls

Brian Parvizshahi edited on February 7, 2013

michael@mikehonda.com



X



031913 MH calls.xls

Brian Parvizshahi edited on March 20, 2014

030514 MH Contribution 2008-2014.xls

Brian Parvizshahi edited on March 7, 2014

022614 Labor List.xls

Brian Parvizshahi edited on February 26, 2014



022514 Labor List xis

Brian Parvizshahi edited on February 25, 2014





2012 khanna donors Pritpal Singh xls

Brian Parvizshahi edited on September 25, 2014



112th pac fundraisers.xls

Member Name	Campaign Name	FEC ID Number	PAC F
Ackerman, Gery	Committee to Elect Gary L. Ackerman, Inc	(3018574)	Silverbe
Alimire, Jason	Citizens for Altenire	CX0185241	Rachael
Andrews, Robert	Andrews for Congress Committee	C00243428	Ben Con
Baca, I/se	Friends of Joe Baca	CXX25449	Joseph N
Baldwin, Tammy	Tammy Baldwin for Coogness	C00326801	Starcy 8

Rob Eberhardt Stanford Caskey 2520 Longview St., Ste. 410 Austin, TX 78705

o: <u>(512) 457-1909</u> m:<REDACTED> f: <REDACTED>

EXHIBIT 2

Brian Parvizshahi | LinkedIn



Brian Parvizshahi

500+

Campaign Manager at Ro Khanna for Congress

San Francisco Bay Area | Government Relations

Current

Ro Khanna for Congress

Previous

Ro Khanna for Congress, Mayoral Race,



песопшенцацона

i heranii nas recommenden miiari

View Brian's full profile. It's free!

Your colleagues, classmates, and 400 million other professions kine on Linkedin.

View Brian's Full Profile

Experience

Campaign Manager

Ro Khanna for Congress 2015 – Present (1 year)



Data Director

Ro Khanna for Congress
January 2014 – November 2014 (11 months)



Field Director

Mayoral Race

January 2013 - November 2013 (11 months)

Service Fellow

Presidential Inaugural Committee

December 2012 - January 2013 (2 months)



Field Organizer

Organizing for America - Florida

August 2012 - November 2012 (4 months)

Organized the expansion of electoral politics and electorate in Florida with over 15,000 voter contacts

Managed over 500 volunteers in the largest and densest voter population in Pinellas County Directed events within individual precincts and acted as Office Manager for Pinellas Park OFA-FL Office

Performed as the top Field Organizer Regionally and Statewide top 5% based on goals and metrics

Search by name

Over 400 million professionals are already on LinkedIn. Find who you know.

First Name

Last Name

Q

Sign In

Example: Jeff Weiner

What is LinkedIn?

Join Today

Public profile badge

Include this LinkedIn profile on other websites

View profile badges

People Also Viewed



Marco Galluccio
Political Outreach Director at Ro
Khanna for Congress



Ro Khanna Vice President of Strategic Initiatives

at Smart Utility Systems



Maggie Spini Digital Director at Ro Khanna for Congress



Garrett Wessel

Political Organization Professional



Nicolle Herrera

Regional Vote Director at Ro Khanna for Congress



Vivek Kembaiyan

Regional Press Secretary at Bernie 2016



Steve Spinner

Founder & CEO at RevUp Software



Tyler Law

Regional Press Secretary at Democratic Congressional Campaign Committee



Tarun Galagali Product Marketing at Google



Leah S. Cowan

Director of Mobilization at Common Sense

9/16/2016

Brian Parvizshahi | LinkedIn

Operations Director

Obama for America

June 2012 - August 2012 (3 months) | Washington D.C. Metro Area

Oversaw the running operations of the entire OFA-DC headquarters

Assisted in coordinating and organizing Days of Actions between OFA-DC and OFA-VA

Ensured that all aspects of office operations ran smoothly through developments of policies and procedures

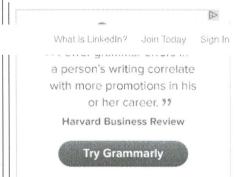
Served as the point person for 74 Field Organizers with respects to all issues not specific to Field Directors

Hire independent Logo

Designers like Brian

Post your project – It's free →

See Logo Designers available for hire



September 2010 - June 2012 (1 year 10 months)

Regulating human resources in day to day objectives and oversee the duties of staff.

Provided superior customer service, answered customer questions, and resolved customer complaints.

Multi- tasked in a fast- pace, team oriented environment.

Administer guest concerns and resolved conflicts in a positive manner.

District Representative Intern

U.S. House of Representatives

February 2012 - May 2012 (4 months)

Tracked current and relative legislative activity affecting Transportation and Infrastructure Committee

Performed data entry through IQ Database and office administrative tasks

Aided in Congressional District Projects

Drafted constituent correspondents and weekly Congressional newsletters

Personally addressed constituents' concerns with discretion

Field Representative Intern

California State Assembly .

August 2011 - January 2012 (6 months)

Assisted with data collection and inputs for constituents of the 68th District

Coordinated services and events for the Assemblymember, constituents and lobbyists

Conducted research and performed data for the fiscal year

Conducted research for Senate and Assembly bills and issues

Composed documents and templates in newsletter analysis with discretion.

Server

BJs Brewhouse and Restaurant

January 2009 - May 2010 (1 year 5 months)

Assisted in training new employees in areas of customer service, policy, and procedures.

Responsible in cashiering duties meeting sales quota.

Maintained excellent communication with staff and guests.

Counseling Office Assistant

Edwin Markham Middle School

June 2008 - December 2008 (7 months)

Evaluated and implemented procedures to improve office efficiency. Organized records of students and coordinated class schedules.

Answered and directed telephone calls.

016 Brian Parvizshahi LinkedIn		
Languages		
Spanish		
Skills		
Oniis		
	What is LinkedIn? Join Today	Sign Ir
	,	
Grassroots Organizing Event Planning Social Media Non-profits Public Relations		
Public Speaking Volunteer Management See 35+		
Education		
RELEVANT COURSEWORK: Introduction to Public Management and Policy, Political Behavior and Motivation, Political Philosophy, World Politics 21st Century, Government and the Economy Model UN, Law Politics and Society, Globalization Justice and Democracy, Polls Statistics and Interpretation Philosophy of Law, Business Ethics Calculus Activities and Societies: Representative and Delegate for Model UN Team 2012. Member of the CSUF On Track Club. Second Degree Knight and member of the Knights of Columbus. Delegate and representative for the Inter-Fraternity Council Philanthropy chair, Communications chair, and New Member Peer Mentor for Sigma Phi Epsilon Fraternity. Member of the CSUF Philosophy Club. Member of ASI Lobby Corps. Active Member of the Model UN Club		
Jurupa Valley High School Mira High School Diploma 2004 – 2008		
Activities and Societies: Captain of Varsity Football Team Track and Field		
Recommendations		
A preview of what LinkedIn members have to say about Brian:		
66 It was a pleasure to work with Brian on the 2012 Obama campaign. Despite his young age, he impressed me with his		

Sign up to see who recommended Brian

See more

ability to work with individuals on a mos...

Groups

9/16/2016

Brian Parvizshahi | LinkedIn

National Summit on ... LAW JOBS NETWOR... American Society for... American Politics Cu...

POLITICS - Political

Remie2016

CSUF Alumni

What is LinkedIn? Join Today Sign In

View Brian's full profile to...

- · See who you know in common
- · Get introduced
- · Contact Brian directly

View Brian's Full Profile

LinkedIn member directory: a b c d e f g h i j k l m n o p q r s t u v w x y z more Browse members by country

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EXHIBIT 3

2012 2010 Crane Club

2012	2010 Name	City	State Zip	Home Phone	Work Phone	Salutation	Organization
2000	3000 Manuel & Linda Austin, Ir.	San Jose	CA	***************************************			
1000	O Greg & Anne Avis	Pale Alto	CA				
1000	O American Optometric Association PAC	Alexandria	VA				
1000	4000 Anita Chan O Hon, Suzanne & Dr. Steven Chan	Milpitas	CA CA				
2000	500 Hedy Chang	Morgan Hill	CA				
2000	1000 Kerry Doi	Gardena	CA				
1000	O Bob Foster	A Rosemead Saratoga	CA CA				
1000	4500 Mike & Mary Ellen Fox 1000 John Freidenrich	Palo Alto	CA				
4000	4000 Corncast PAC	Philadelphia	PA				
1000	© Gary Griggs	Milbrae Los Gatos	CA				
2000	2500 Jerrold Hiura 1000 Bill Imada	West Hollywood	CA				
4000	D Hsing Hsien & Margaret Kung	Los Altos Hills	CA				
8000	10000 AAJ PAC	Washington	DC.				
2500 5000	1000 Hon, Fiona Ma 6000 Teamsters	San Francisco San Francisco	CA				
15000	4800 George & Judith Marcus	Pako Alto	CA				
2500	4800 Hon. Dianne Mckenna	Sunnyvale	CA				
2000	1000 Next America Fund	Oakland	CA.				
2500	1000 Dr. Ko Nishimura	San Jose San Jose	CA CA		11.0	*	
1500	500 Alex Park 2000 HP PAC	San Jose	CA				
10000	5000 Machinists	San Jose	CA	•			
2000	1000 Jim & Fomie Satake	Mountain View	CA	9			
1000		San Jose Washington	CA DC				
10000		Fremont	CA				
1000		Sacramento	CA				
1000		Foster City	CA				
1000		Las Vegas	NV		•		
1000	2400 Tim Wong 2000 Charles Woo	Las Vegas Rancho Palos Verdes					
5500		Vacaville	CA				
1000		Temecula	CA				
4300		Milphas	CA				
1000	and the second s	Las Vegas Edison	NV NJ				
1000		Mento Park	CA				
2000		Washington	DC			•	
1000		Cupertino	CA				
1000		Washington Chicago	DC 1L				
2500	the second secon	Rockville	MD				
1000		Chicago	iL.				
5000		Los Altos	CA				
2000		Saratoga Los Altos	CA				
1000 3500		Menlo Park	CA				
10000	5000 International Union of Operating Engine	Washington	DC.		*		
1000		Soquel Washington	CA DC				
1000 2500		Washington	DC				
1500		Elmhurst'	MA				
5000		Fremont	CA NY				
1500 5000		New York Washington	DC				
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1000		Washington Washington	DC DC				
4000 5000		Washington	DC				
250		San Jose	CA				
390	2500 Plumbers & Steamfitters, Local 467	Burlingame	CA				
1600		Livermore Los Altos	CA CA				
150 500		Washington	OC.				
300		Washington	DC				
100		Washington	DC				
500		Washington Gaithersburg	DC MD				
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100		WWashington	DC				
100		Arlington	VA DC				
400 750		Washington Oakland	CA	V.			
200		Atherton	CA .	*			
100	The state of the s	Fremont	CA				
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100		Hillsborough Washington	CA DC				
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750		Washington Loc Means	NV NV				
240		Las Vegas Washington	DC				
200		Washington	DC				
700		Atherton	CA				
250		Las Vegas	NV CA				
100		Santa Clara Washington	DC				
408		Washington	DC				
100	00 0 Ann Miller	Washington	DC				
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5000	4000 Lockheed Martin PAC		VA DC
3000	0 Merck 0 Microsoft		DC DC
1500	2000 Parsons Brinckerhoff Inc.		DC
2000	O Pfizer, Inc.	Washington (DC
1250	0 Planned Parenthood Action Fund		DC
8000	8000 National Association of Realtors		DC DC
1500 2500	S000 United Technologies PAC 0 Catherine McDaniel		00
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1000	O Garry Rayant		CA DC
4000	2000 National Education Association (NEA) 1000 Northrop Grumman PAC		VÁ
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1000	8 Mae Woo	San Francisco	CA
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3800	750 Richard Lu		CA
3000	2000 Gloria Wu, M.D.	No. of the second secon	CA
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1000	O Richard Cristina		CA
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2000	1000 SEMI North America	Washington	DC
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1000	O Nandini Tandon	Los Altos	CA
1000	1000 Beryl Grace	Los Gatos	CA
1000	0 Mark Sugarman	San Francisco	CA
1000	1000 figai Nguyen O Wai-ling Eng	San Francisco	CA
2000	2500 Amgen	Washington	DC
2500	O Burlington Northern Santa Fe BNSF	Washington	DC
1000	1000 Kendeli Pease	Falls Church	VA
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1000	O ACEC O Daniel and Sunita Leeds	Washington	DC
1000	0 Thomas Chung	Los Angeles	CA
3000	0 Robert Wu	Los Altos	CA
3500	O Michelle Hu	Atherton Atherton	CA
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1000	1000 Yung Duk Kim	Westport	CT
1000	500 Dennis Lyle	Washington	DC
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1000	O Pameia Tranpark	Houston	TX
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2500	0 Richard Wells	San Antonio Washington	TX DC
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1500	1500 Nossaman PAC	Washington	DC
1000	0 Daniel Kalik	Washington	DC
1000	1000 AECOM PAC	Arlington	VA
1000	0 3 Street PAC 500 American Sugar Cane League	Washington Thibodaux	LA
1000	0 Nancy M. Butler	Fairlax	VA
1000	500 California Water Service	San Jose	CA
7000	2000 McAfee Inc. PAC	Plano	TX
2500	1000 Sang Nhim	San Jose Reston	CA
1000	0 ioe Velasquez 0 Edward Choi	Wayne	NJ
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1000	D Valli Benesch		CA
1000	0 Dennis Albers		CA
1000	0 Tracy Albers 0 Jos Felson		CA CA
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1000	O Ali G. Siddiqui & Naila Qureshi		CA
1000	0 Ronnie M Momen		CA
1000	O American Animal Hospital		CA
2500	D American Academy of Pediatric Dentistr		H.
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1000	O SO4 PAC		VA
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1000	0 Saira Yoo		NJ
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0	0 Joyce Hsu		CA
2500 1000	0 Mary Ellen Fox 0 Daniel Chao		CA
1000	0 Life and Gerard Leeds		MY
0	© Richard Breckinridge		CA
2000	O American Society of Plastic Surgeons	Arlington Heights	IL
1000	0 Astellas PAC		DC
1000 2000	6 Dong Woo Hahm 6 Christine Chol	Hernando Potomac	FL
1500	0 American Quarter Horse	Amarillo	TX
6000	0 Olkan & Gonul Cavalci	Sunnyvale	CA
1000	9 Sunita Leeds	Washington	DC
2500	0 Daniel Leeds	Washington	DC

EXHIBIT 4

San Jose Inside (http://www.sanjoseinside.com/2015/12/16/leaked-1000-cranes-list-links-congressman-mike-honda-to-pay-to-play-actions/). Case 5:16-cv-05416 Document 5-23 Filed 09/22/16 Page 2 of 2

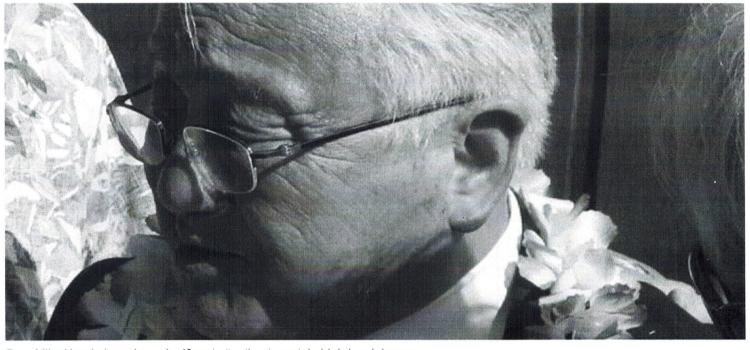
INVESTIGATIVE REPORTS

Leaked '1000 Cranes' List Links Congressman Mike Honda to Pay-to-Play Actions

By Josh Koehn

@josh_koehn / December 16, 2015

<u>70</u>



Rep. Mike Honda has given significant attention to certain high-level donors.

Earlier this month, an anonymous envelope arrived in the mail. It contained what appears to be Congressman Mike Honda's "1000 Cranes (http://www.sanjoseinside.com/2015/07/22/honda-burns-through-campaign-cash-named-fundraising-efforts-after-hiroshima-victim-story/)" list, the million-dollar Rolodex of 1,000 donors who contributed at least \$1,000 each.

The fundraising initiative—the political equivalent of an airline or hotelier's loyalty program that provides preferred customers with room upgrades or seats with more legroom—never hit its body count. It nonetheless provided concierge-grade representation in Washington, D.C.

Honda's employees referred in emails to "friends of MH," meaning they were given priority over other constituents. Faster, better government access for those who could afford it.

Honda, in many ways, lost the benefit of the doubt when the Office of Congressional Ethics (http://www.sanjoseinside.com/2015/07/15/office-of-congressional-ethics-conducts-review-of-mike-honda/) decided that there is "substantial reason to believe" the eight-term congressman violated House rules. The bipartisan panel released a 41-page report in September (http://www.sanjoseinside.com/2015/09/04/10-biggest-takeaways-from-the-mike-honda-ethics-probe-report/) that recommended the House Committee on Ethics further investigate Honda (D-San Jose) and his staff for using "official resources for campaign purposes." Another conclusion was Honda's biggest campaign contributors may have received favors, such as access to the congressman or even help in facilitating immigration visa requests.

The "Cranes" database (posted below) appears to have fallen short of 1,000 check writers, noting just 281 people and groups who helped support the congressman's 2010 and 2012 re-election efforts. But many contributors gave far more than \$1,000. The documents list some of the most influential people, unions and political action committees (PACs) in national politics, as well as difficult-to-attain personal information, like the phone numbers of billionaires.

In addition to the amount each contributor gave in two separate election cycles, the "Cranes" documents include: addresses, home and work telephone numbers, employers and, if required, nicknames for the congressman to use when addressing individuals.

Honda campaign manager Michael Beckendorf agreed to discuss the "Cranes" list by phone Monday evening, but only if the conversation was kept off the record. Holdan Filon Comment 5-24 Filed 09/22/16 Page 1 of 3

A review of the list, along with a crosscheck of contributions made to Rep. Honda's campaigns and official actions he took while in office, suggest that "Cranes" received preferential, if not transactional, treatment.

On Oct. 12, 2011, Honda walked on to the House floor and wished Takayoshi Oshima a happy birthday. It was a short speech (https://scout.sunlightfoundation.com/item/speech/CREC-2011-10-12-pt1-PgE1827-2.chunko/rep-michael-honda-celebrating-the-70th-birthday-of-takayoshi-oshima), all of 441 words recorded in the Congressional Record, but a nice gesture to the CEO of Allied Telesis. What the record did not note, however, is that Oshima was Honda's single biggest campaign benefactor in 2010, and a week prior to the birthday wish, Oshima maxed out with a contribution of \$2,500. In total, Oshima gave Honda's 2012 campaign \$15,000: \$5,000 to his actual campaign (http://www.opensecrets.org/indivs/search.php?name=takayoshi&cycle=2012&sort=R&state=&zip=&employ=&cand=honda&submit=Submit), and another \$10,000 to Honda's PAC (http://www.opensecrets.org/indivs/search.php?

name=takayoshi&cycle=2012&sort=R&state=&zip=&employ=&cand=New+Vision+America+Fund&submit=Submit), New Vision America Fund.

In the spring of 2010, <u>Honda introduced the Smart Electronics Act, H.R. 5070 (https://honda.house.gov/news/press-releases/rep-honda-introduces-smart-electronics-bill-to-green-the-fast-growing-gadget)</u>. The bill's goal was to create new requirements on greenhouse gases when manufacturing smartphones and other electronic devices. Sehat Sutardja, CEO of the Santa Clara-based Marvell Semiconductors, Inc., was quoted in Honda's press release and described as "a leading industry proponent of the bill."

What the release omitted is that just six months prior, on Oct. 4, 2009, Sutardja and Marvell co-founder Weili Dai, both listed as "Cranes," gave Honda's 2010 re-election campaign the highest permissible contributions of \$4,800 each

(http://www.opensecrets.org/indivs/search.php?name=&cycle=2010&sort=R&state=&zip=&employ=marvell+technology&cand=honda&submit=Submit)
—as well as a combined \$10,000 for Honda's PAC (http://www.opensecrets.org/indivs/search.php?

name=&cycle=2010&sort=R&state=&zip=&employ=marvell&cand=New+Vision+America+Fund&submit=Submit) the same day.

Anita Chan, a retired homemaker and noted "Crane," has supported Honda throughout his time in Congress. Her inclusion on the list is significant because the only bill Honda has authored in 14 years in Congress (https://honda.house.gov/news/press-releases/rep-michael-honda-celebrates-chinese-american-leader) led to a San Jose post office being named in 2009 after Anita's late husband, Gordon Chan, a commercial flower grower and civic volunteer. Anita Chan gave Honda \$4,000 in 2010 and \$2,000 in 2012.

Honda has mostly refrained from commenting on his "Cranes" list and the House Committee on Ethics investigation, but on Monday he attended two:http://www.sanjoseinside.com/wp-content/uploads/2015/12/Screen-Shot-2015-12-16-at-12.33.41-AM.png) fundraisers (http://www.sanjoseinside.com/wp-content/uploads/2015/12/Screen-Shot-2015-12-16-at-12.34.07-AM.png) co-hosted in Silicon Valley by "Cranes" Ta-Lin and Joyce Hsu, and C.C. and Regina Yin. The events sold a variety of contribution levels and teased access to Gary Locke, the former U.S. Ambassador to China.

Hari Sevugan, a spokesman for Ro Khanna, Honda's challenger in last year's elections and rematch opponent for 2016, said that Honda's decision to attend the event instead of budget negotiations in Washington D.C. "doesn't just show how unessential he is to this Congress, but where his priorities lie."

Sevugan added: "It used to be sort of a joke that Mike Honda has only passed one bill in his eight terms in Congress, and that was to name a post office. Now that we know the post office was named for one of his top donors, it's also telling."

In an email, Beckendorf called criticism of Honda's decision to return to the district "absurd and unfounded."

Attempts to obtain more information from Honda's office over the last several months have gone nowhere, in part because <u>Congress—unlike other federal agencies—is not subject to Freedom of Information Act (FOIA) requests (http://nsarchive.gwu.edu/nsa/foia/guide.html)</u>. This means, there is no way to compel release of information related to Honda's interactions with his nearly 300 "Cranes."

Tim Wong, CEO of the Nevada-based company Arcata, was noted as a "Crane" in 2010 (\$2,400) and 2012 (\$1,000), and, in March 2014, Rep. Honda escorted the businessman around Capitol Hill for photo ops, according to Wong's Twitter feed.

Famed venture capitalist Vinod Khosla was listed as one of Honda's "Cranes" in 2010 and 2012, when he gave \$2,400 and \$2,500, respectively. But in 2013, Khosla threw his support behind Khanna. A year later, <u>Honda was free to slam Khosla's efforts to shut off public access to Martin's Beach (http://www.bizjournals.com/sanjose/news/2014/09/11/silicon-valley-congressman-rejects-vc-vinod.html)</u>, which traversed the VC's property.

Honda received plenty of well-deserved kudos for his commitment to public spaces, but his outrage was absent in late 2012, when he still had Khosla's support—and money.





TIM WONG ⊕wongtim4 · 12 Mar 2014
The Lockheed Martin Orion Program Rigel Award making the rounds on Capitol Hill with Congressman Mike Honda

In one of President Obama's more recent trips to Silicon Valley, <u>Honda escorted the POTUS to the home of real estate magnate George Marcus (http://www.mercurynews.com/california/ci_26199487/obama-arrives-bay-area-fundraiser)</u> and his wife, Judith. Both are listed as "Cranes," and the two have been among Honda's biggest supporters. Each maxed out in 2010 (\$4,800) and 2012 (\$5,000), and the Marcuses also kicked in \$5,000 for Honda's PAC during the 2012 election cycle.

One of the more intriguing details of the "Cranes" list is that it doesn't differentiate dollars given to Honda's PAC and his actual campaign. In fact, on more than a few occasions, donors contributed money on the same date to both campaign funds.

Ann Ravel, chair of the Federal Elections Commission (FEC) and former lead counsel for Santa Clara County, told San Jose Inside that FEC rules are notoriously loose. In the history of the commission, she noted, there has never been a single investigation into improper coordination between candidate committees and PACs.

"Obviously, people can contribute to both of them legally, the issue is the question of coordination," Ravel said. "As I have decried before, the rules on coordination were written many years ago, prior to the existence of Super PACs, and the commission has been unwilling to write rules that would address some of these issues."

Sources suggest Honda may be benefitting from the slow turning wheels of government's self-policing mechanisms. In its recommendation to continue investigating Honda and his staff for commingling representative government and political campaign activities, the Office of Congressional Ethics (OCE) recommended that Honda's 2014 campaign manager, Doug Greven, be subpoenaed to testify.

Greven has not returned calls for comment, but sources say that the House Committee on Ethics has still not contacted Greven more than three months after the OCE STEP 5:16-CV-05416. Document 5-24 Filed 09/22/16 Page 3 of 3

Linked is a PDF of what appears to be Congressman Mike Honda's "1000 Cranes" list (http://www.sanjoseinside.com/wp-content/uploads/2015/12/Mike-Honda-1000-Cranes-List-Redacted.pdf). Home addresses and phone numbers have been redacted.

Pages 1, 2 and 3 of the "1000 Cranes" list are also linked as JPEG files here:

Page 1 (http://www.sanjoseinside.com/wp-content/uploads/2015/12/Congressman-Mike-Honda-1000-Cranes-List Page 1.jpg)
Page 2 (http://www.sanjoseinside.com/wp-content/uploads/2015/12/Congressman-Mike-Honda-1000-Cranes-List Page 2.jpg)
Page 3 (http://www.sanjoseinside.com/wp-content/uploads/2015/12/Congressman-Mike-Honda-1000-Cranes-List Page 3.jpg)

Josh Koehn is the managing editor for San Jose Inside and Metro Silicon Valley. Email tips to <u>josh@metronews.com</u> (mailto:josh@metronews.com) or follow him on Twitter at @Josh Koehn (https://twitter.com/Josh Koehn).

1 2 3 4 5 6	Gautam Dutta, Esq. (State Bar No. 199326) BUSINESS, ENERGY, AND ELECTION 5655 Silver Creek Valley Rd # 900 San Jose, CA 95138 Telephone: 415.236.2048; Fax: 213.405.2 Email: Dutta@BusinessandElectionLaw.co Attorneys for Plaintiff MIKE HONDA FOR CONGRESS	LAW, PC 416
7 8	UNITED STAT	TES DISTRICT COURT
9	NORTHERN DISTRICT OF	CALIFORNIA, SAN JOSE DIVISION
10		
11	MIKE HONDA FOR CONGRESS,	CASE NO.
12	Plaintiff,	JUDGE: TBD
13	VS.	DECLARATION OF ROBERT EBERHARDT IN SUPPORT
14 15	BRIAN PARVIZSHAHI, et al. Defendants.	OF PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION
16	J	Hearing Date: TBD
17	I, Robert Eberhardt, declare as follows:	
18	MY BACI	KGROUND
19	I am the Opposition Research	er for Mike Honda for Congress.
20	2. I am Partner and Director of I	Research at Stanford Caskey, which is located in
21	Austin, Texas. In that capaci	ty, I provide opposition and policy research, strategic
22 23	consulting, and a variety of or	ther services to political candidates and groups,
23	corporate clients, and labor un	nions across the nation.
25	3. My research has been feature	d in the national media, including the Wall Street
26	Journal.	
27	4. I earned my bachelor's degree	e in Corporate Communications from the University
28	of Texas at Austin.	
		EBERHARDT DECLARATION
	11	EBELLI ILE I BECENHUTTON

5. I am not a party in this action. I make this declaration of my own personal knowledge, and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

THE KHANNA CAMPAIGN'S ACCESS TO DONOR INFORMATION

- 6. On May 31, 2016, Michael Beckendorf, Campaign Manager for Mike Honda for Congress, contacted me. He asked me to assist in assessing a data breach involving the campaign's confidential donor information.
- 7. Dropbox is a cloud (online) storage service that is frequently used for sharing and synchronizing files.
- 8. The donor information at issue was stored in the Dropbox account of Arum Group, LLC, the former fundraising consultant for Mike Honda for Congress.
- 9. For this purpose, I was given access to the campaign's donor information (hereinafter, the "Honda Folders" stored in the Arum Group's Dropbox account.
- 10. Among other things, the Honda Folders contained personal contact information of the campaign's large-dollar and small-dollar donors.
- 11. After examining the Honda Folders, it became clear to me that Brian Parvizshahi the current Campaign Manager of Ro for Congress, Inc. had accessed our campaign's confidential information.
- 12. That same day (May 31, 2016), I sent an email to Mr. Beckendorf and our campaign team. In that email, I stated: "Yeah, as Michael said, it looks like *everything* related to Mike Honda's fundraising over the last years is in this folder that Brian [Parvizshahi] had access to." A true and accurate copy of that email (with email addresses redacted) has been attached as Exhibit 1 to the accompanying Declaration of Michael Beckendorf.
- 13. Subsequently, I thoroughly analyzed and reviewed the Honda Folders located on the Arum Group's Dropbox account.

Italics added.

- 14. According to his LinkedIn profile, Brian Parvizshahi joined the Khanna campaign as Data Director in January 2014, and became campaign manager last year. A true and accurate copy of Mr. Parvizshahi's LinkedIn profile² has been attached as Exhibit 2 to the accompanying Declaration of Michael Beckendorf.
- 15. According to reports filed by the Khanna campaign with the Federal Election Commission (FEC), Mr. Parvizshahi was compensated by the Khanna campaign beginning Jan. 10, 2014. True and accurate copies of Khanna campaign FEC reports (downloaded from the FEC's website at www.fec.gov) containing payments to Mr. Parvizshahi have been attached as Exhibit 2.

TIME LINE OF THE DATA BREACH

- 16. During the relevant period, Mr. Parvizshahi accessed the Honda Folders from either of two computers: one had the alias of "BrianParvi-PC"; the other had the alias of "BrianParvi".
- 17. Before Jan. 2014 (when he began working for the Khanna campaign), Mr. Parvizshahi "edited", "added", or in some way modified the Honda Folders at least a total of seven times: three times on Feb. 7, 2013, once on Feb. 18, 2013, twice on June 23, 2013, and once on Sept. 20, 2013.
- 18. I have reprinted, below, true and accurate copies of screenshots of each file that Mr. Parvizshahi "edited", "added" or in some way modified as they appear on my own Dropbox screen for the period Feb. 7, 2013 through Sept. 20, 2013:





February 7, 2013

091011 Chicago host cmte targets.xls Brian Parvizshahi edited on February 7, 2013

26

27

28

Added by Brian Parvizshahi. • Desktop

BrianParvi-PC

091011 Chicago host cmte t... • 9:03 PM

Downloaded from https://www.linkedin.com/in/brianparvi (last visited Sept. 17, 2016).



2012 Cycle Total \$250+ IND.xls

Brian Parvizshahi edited on September 20, 2013

September 20, 2013





2012 Cycle Total \$250+ IND.... • 4:48 PM

Added by Brian Parvizshahi. . Desktop

- 19. After Jan. 2014 (when he began working for the Khanna campaign), Mr. Parvizshahi continuously accessed the Honda Folders. Specifically, Mr. Parvizshahi "edited", "added", or in some way modified individual documents within the Honda Folders at least forty-four (44) times. Several documents were "edited", "added", or in some way modified more than once.
- 20. I have reprinted, below, true and accurate copies of screenshots of each file that Mr. Parvizshahi "edited", "added", or in some way modified as they appear on my own Dropbox screen for the period Jan. 1, 2014 through June 14, 2015:



Feb 2014 PAC targets.xls • 4:04 PM

Edited by Brian Parvizshahi. • Desktop

Feb 2014 PAC targets.xls

PAC Targets Hoyer.xls

2/18/2014 12:20 PM Brian

2/18/2014 7:08 PM Brian

24

25

26

27

28

NVA conference call 022114.xls

Brian Parvizshahi edited on February 19, 2014

1		2/10/2014 444 PM - P-i
2	NVA conference call 022114.xls	2/19/2014 4:14 PM Brian
3	February 26, 2014	
4		BrianParvi-PC
5	NVA conference call 022114 • 3:43 PM	Added by Brian Parvizshahi. • Desktop
6	-	
7	022514 Labor List.xls Brian Parvizshahi edited on February 25, 2014	
8		
9		
10	022514 Labor List.xls	Modified 2/25/2014 0:57 444 Price
11	in /Honda	Modified 2/25/2014 9:57 AM Brian
12	022614 Labor List.xls	
13	Brian Parvizshahi edited on February 26, 2014	
14	T==D	
15	022614 Labor List.xls	2/26/2014 3:03 PM Brian
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18	Labor list max outs 021814.xls	2/26/2014 3:03 PM Brian
19		
20	February 26, 2014	
21	Labor list max outs 021814 • 3:15 PM	Added by Brian Parvizshahi. • Desktop
22	Labor list fliax outs 021014 53.13 PW	Added by brian Parvizshani Desktop
23		
24	2012 Contributions Industry Breakdown.xls Brian Parvizshahi edited on February 28, 2014	s
25	,	
26	February 28, 2014	BrianParvi-PC
27	2012 Contributions Industry • 9:37 PM	Added by Brian Parvizshahi. • Desktop
28		,

1 2	× 030514 MH Contribution 2008-2014.xl. Brian Parvizshahi edited on March 7, 2014	S
3	March 7, 2014	BrianParvi-PC
4 5	030514 MH Contribution 20 • 11:11 PM	Added by Brian Parvizshahi. • Desktop
6		
7	X 112th pac fundraisers.xls Brian Parvizshahi edited on March 7, 2014	
8		
9	112th pac fundraisers.xls	3/7/2014 10:59 PM Brian
10		
11		
12		
13	X 031913 MH calls.xls Brian Parvizshahi edited on March 20, 2014	
14		
15	March 21, 2014	BrianParvi-PC
16	031913 MH calls.xls • 1:23 AM	Added by Brian Parvizshahi. • Desktop
17		
18	PAC Targets.xls	3/20/2014 4:54 PM Brian
19		
20	PAC Targets.xls in /Honda/events/2014 Events	Modified 3/20/2014 4:54 PM Brian
21		
22		
23		
24	031913 MH calls.xls	3/21/2014 1:23 AM Brian
25	042214 PAC Calls.xls	
26	× 042214 PAC Calls.xIs Brian Parvizshahi edited on April 25, 2014	
27		
28		
		FRERHARDT DECLARATION

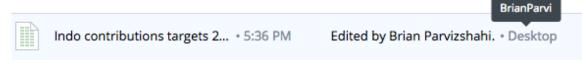
1 2	042214 PAC Calls.xls	4/25/2014 4:26 PM Brian
3		
4		
5	Q2 PAC Targets.xls	5/12/2014 11:51 AM Brian
6	Q2 FAC Targets.xis	3/12/2014 11.51 / NW BHOIL
7		
8	PACs + Hosts List.xls	6/25/2014 11:23 AM Brian
9		
10		
11	2014 Summer PAC List .xls	
12	2014 Summer PAC List .xls Brian Parvizshahi edited on June 30, 2014	
13		
14		
15		
16	× 2012 khanna donors Pritpal Singh.xl: Brian Parvizshahi edited on September 25,	
17		
18	September 25, 2014	BrianParvi
19	2012 khanna donors Pritpal • 12:37 PM	Added by Brian Parvizshahi. • Desktop
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27	2013 MH Contribution Report.xls	
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March 2, 2015



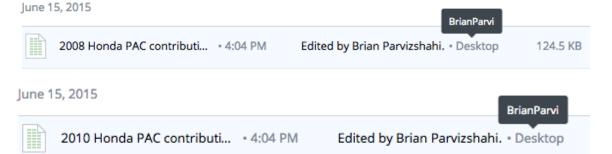
- 21. On June 15, 2015, Mr. Parvizshahi "edited" the Honda Folders for the last time.
- 22. I have reprinted, below, true and accurate copies of screenshots of each file that Mr. Parvizshahi "edited", "added", or in some way modified as they appear on my own Dropbox screen for June 15, 2015:

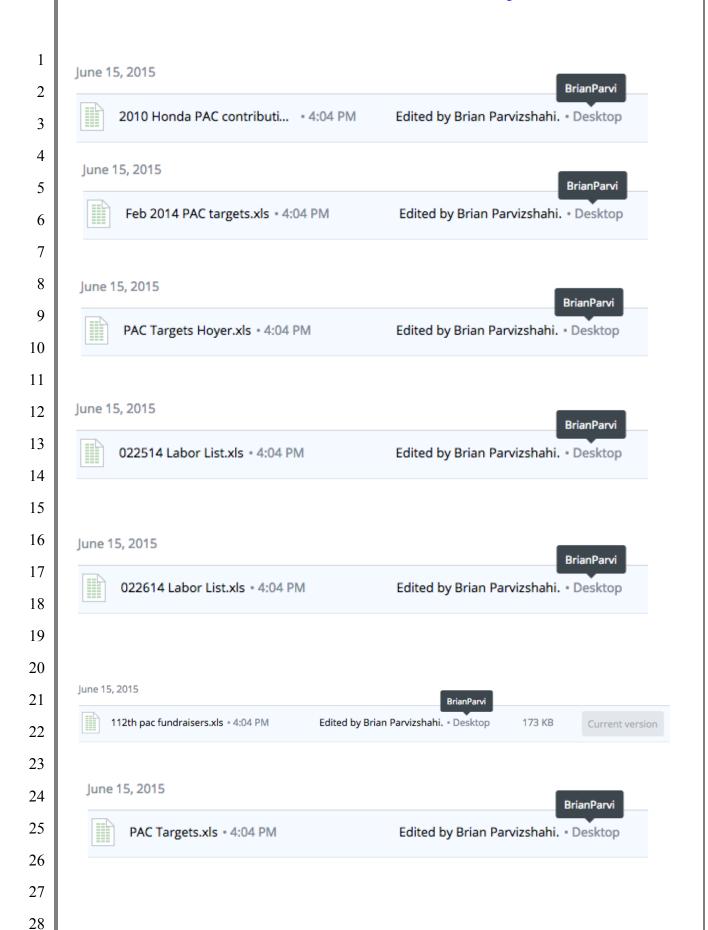
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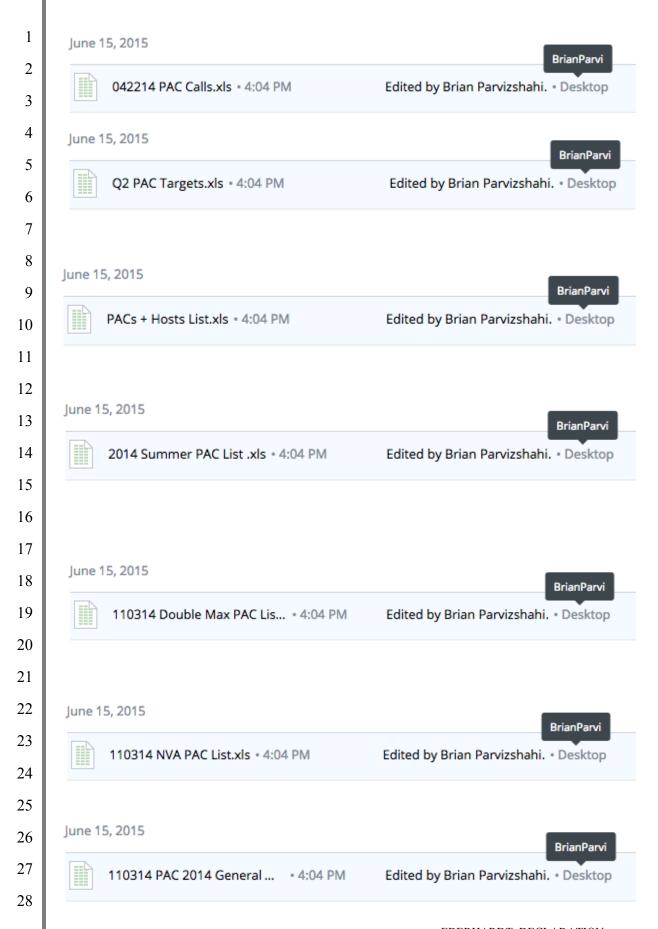
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THE DONOR DOCUMENT "030514 MH contribution 2008-2014.xls"

23. As seen above, on March 7, 2014 Mr. Parvizshahi "edited" and "added" a donor file entitled "030514 MH contribution 2008-2014.xls":





030514 MH Contribution 2008-2014.xls Brian Parvizshahi edited on March 7, 2014

March 7, 2014





BrianParvi-P0

- 24. That file contained 9793 entries of confidential donor information. I have attached, as Exhibit 1, a true and accurate copy of that document (hereinafter, "the Donor Document"), organized by donation amount.
- 25. The Donor Document contains detailed donor information from 2008 to 2014, including but not limited to: date of donation, amount, contact name, employer, occupation, city and state of residence, email, phone numbers.
- 26. As the first page of the document (at top left) shows, the Donor Document provides detailed information with respect to donations totaling to \$3,500,594.11.
- 27. To honor the privacy of the donors, I have redacted the employer, occupation, phone, and email information for all donors who gave more than \$200.
- I have also redacted the names and all information of all donors who gave \$200 or less (hereinafter, "non-FEC donors").³ To conserve paper, I have not attached any page containing the names of non-FEC donors, *unless* that page contains the name of at least one of the six witnesses who have filed Declarations in connection with this Motion for Preliminary Injunction.

Federal campaigns are required to report to the Federal Election Commission donations of more than \$200 during an election cycle. See 52 U.S.C. §30104(b)(3)(a); 11 C.F.R. §104.8(a).

EXHIBIT 1

San Diego CA San Diego CA Los Altos Hills CA Silver Spring MJ Silver Spring OK San Francisco CA Wash Hollywood CA Wash Lose CA San Jose CA Chicago III Chicago III Chicago III Chicago CA Sunwiyale CA Son Mateo CA San Mateo CA San Mateo CA Vacaville CA Vacaville CA Vacaville CA La Canada CA La Canada CA	\$2,600,00 Steven Ma \$2,600,00 Takavoshi Oshima \$2,600,00 Michael Yannaki \$2,600,00 Michael Yannaki \$2,600,00 Michael Yannaki \$2,600,00 Michael Yannaki \$2,600,00 Neai Nguyen \$2,600,00 Thomas Kailath \$2,600,00 Ted Fang \$2,600,00 William Brandt \$2,600,00 William Brandt \$2,600,00 William Brandt \$2,600,00 Christopher, Yeo \$2,600,00 Christopher, Yeo \$2,600,00 Christopher, Wang \$2,600,00 Melodie Lew \$2,600,00 Melodie Lew \$2,600,00 Christopher, Wang \$2,600
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Vienna Vienna	\$500.003 Minhammad Osman Yousuf	4/16/2009
Washington		4/16/2009
Potomac	\$500.00 Jeffrey & Lify Chen	4/16/2009
Washington	\$500.00 Frank Orlandella	4/16/2009
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Potomac	SCOLOU Moses Menado	4/6/2009
Wieshington .	\$500.00 Warren Furufain	11/13/2008
Lamuning	\$500.00 Kevin Shin	11/13/2008
Brooklyn	\$500,00 Ryan Kim	11/4/2008
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Carlsbad	\$500.00 Teh-Hsuang Lee	11/3/2008
Palo Alto		11/3/2008
Mountain View	\$500.00 Symantec	10/31/2008
Monterey Park	\$500.00 Frances Kuramoto	10/23/2008
Mountain View	\$500,00 Syed Handani	10/21/2008
Danville	\$500.00 Shalini Kanoor Collins	10/21/2008
New York	\$500,00 Romita Shefty	10/21/2008
San Carlos		10/21/2008
Fremont	\$500.00 Mohammad Aboobaker	10/21/2008
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San Jose	\$500.00 Ash Kafra	10/21/2008
San Matco		10/15/2008
Chappaqua	\$500.00 Rasekh Huq	10/13/2008
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San Jose		10/11/2008
Milpitas	\$500.00 Kabir Kumar	10/9/2008
New York	\$500.00 Sameena Khan	10/2/2008
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Scarsdale	750	80007176
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San Jose	\$500,00 Yichieh Shiuey	8/31/2008
Potomac	\$500.00 Warren Minami	8/27/2008
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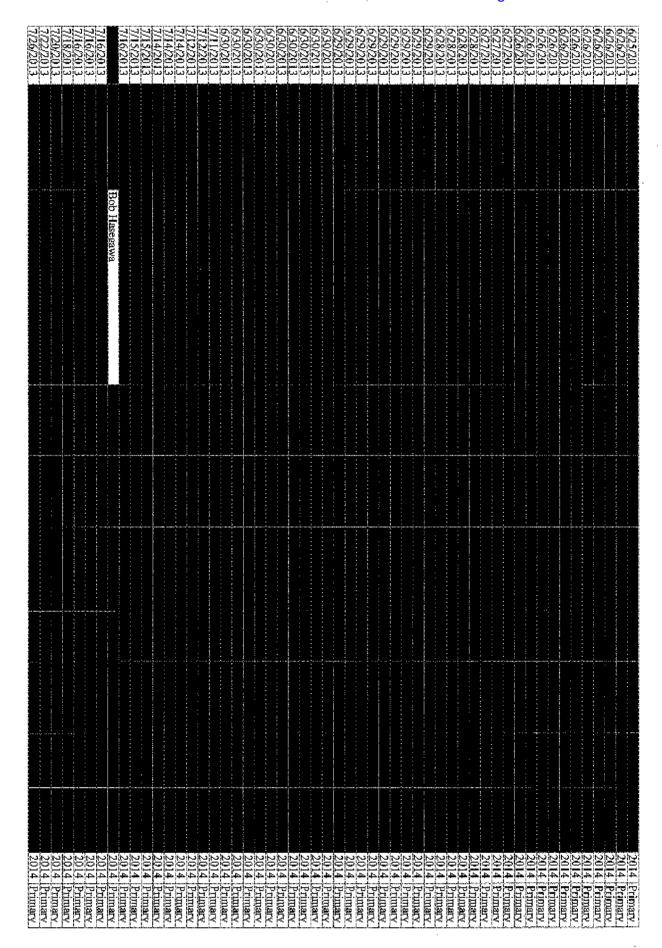
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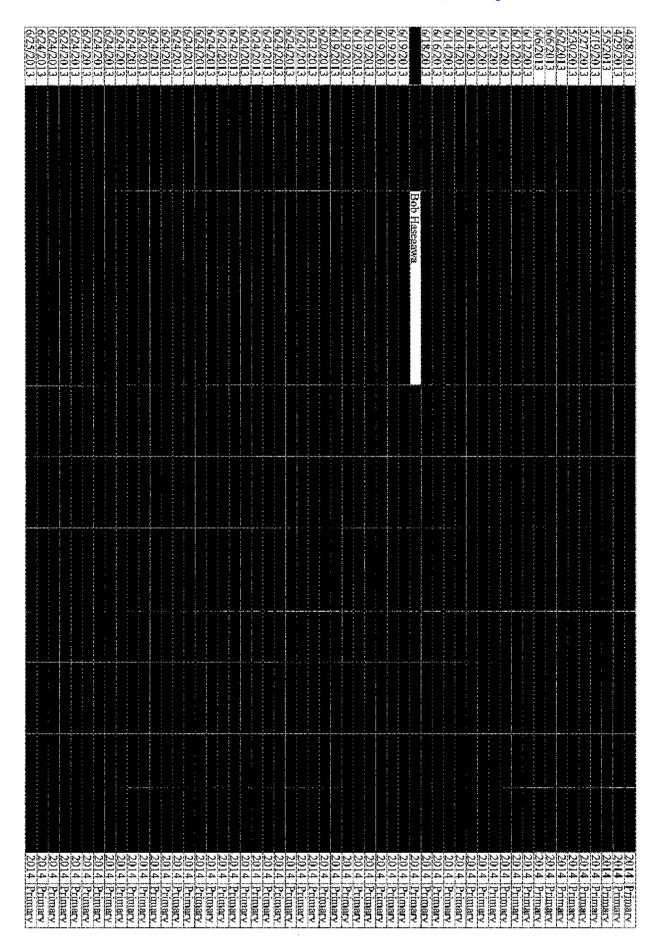
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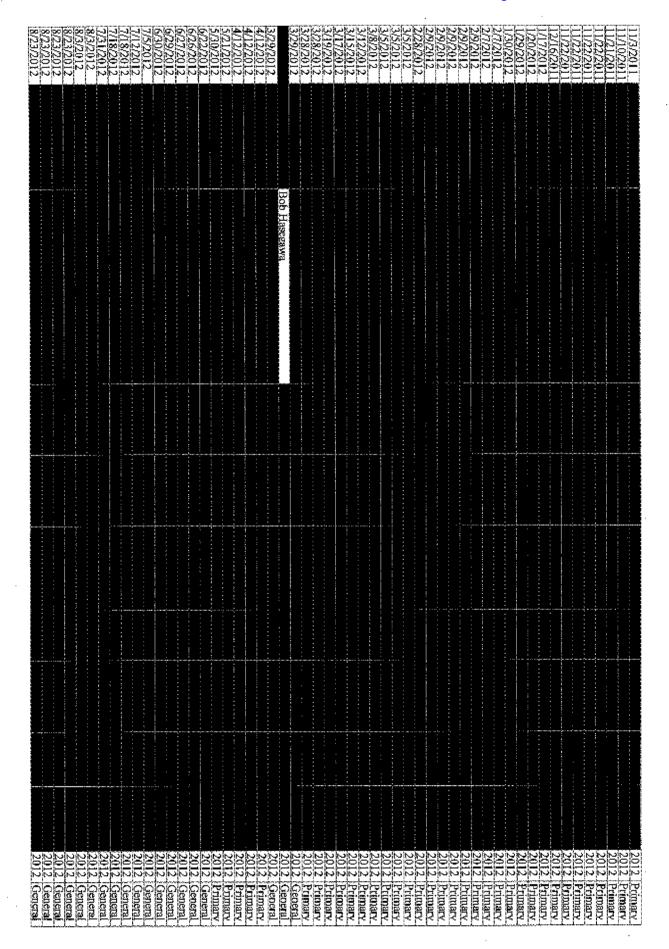
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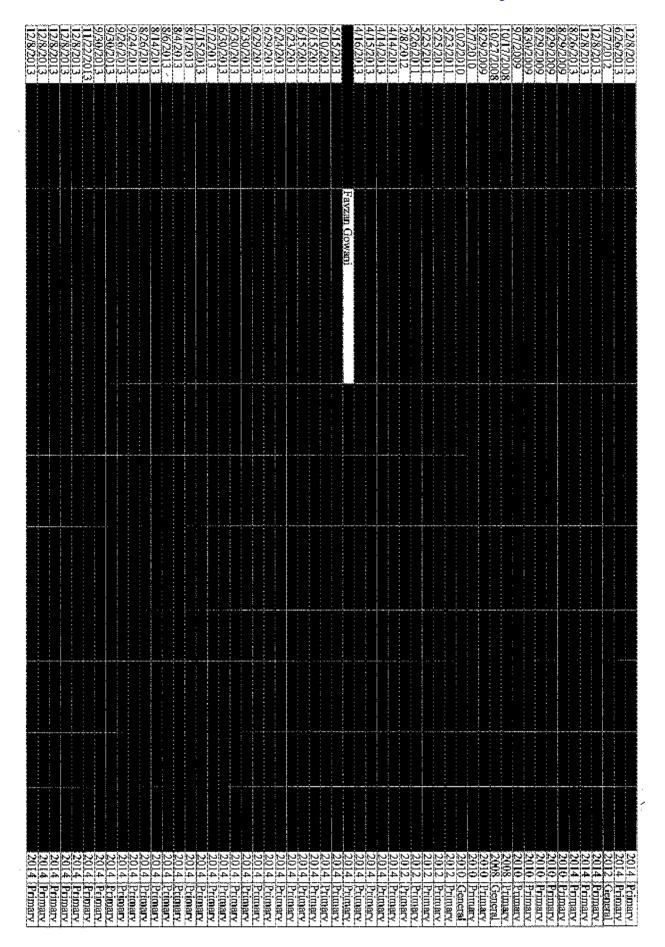
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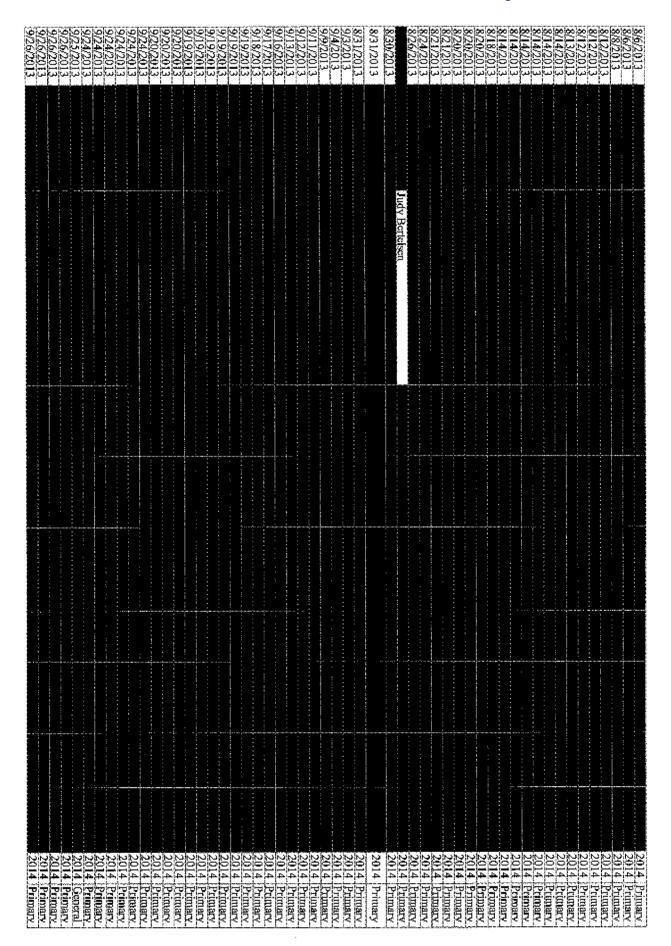


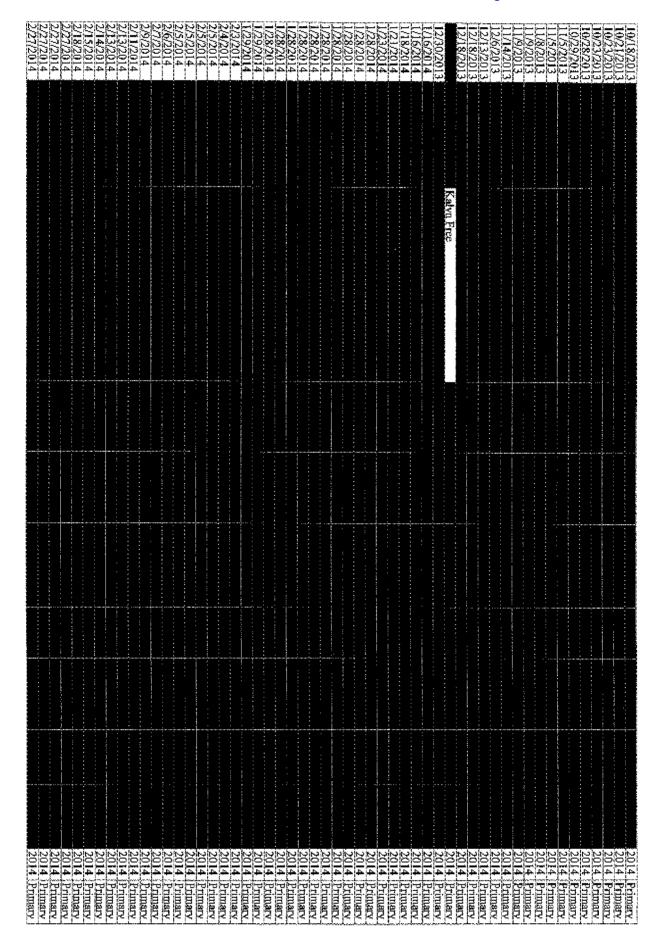


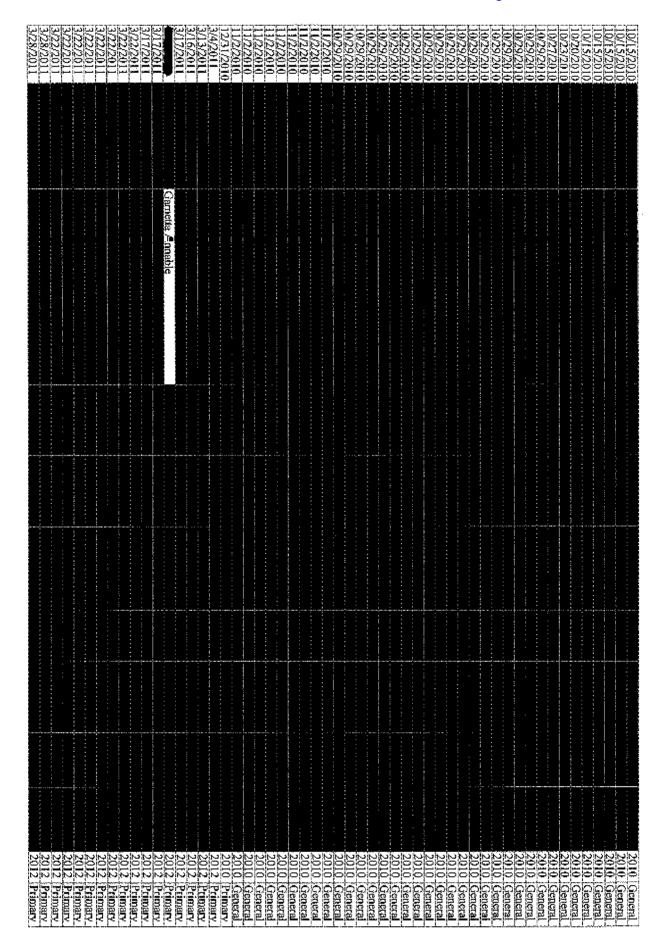


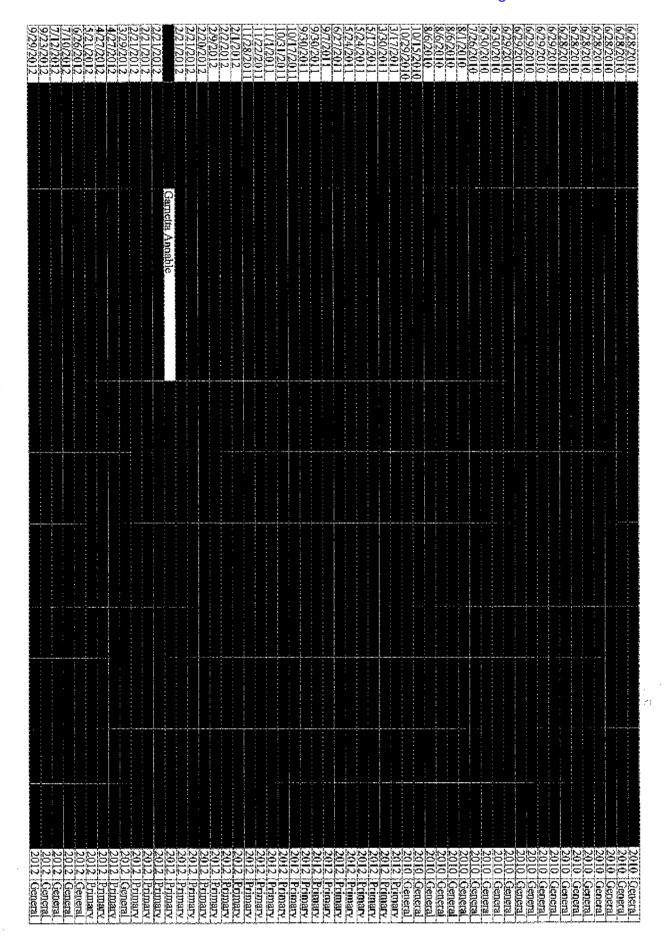


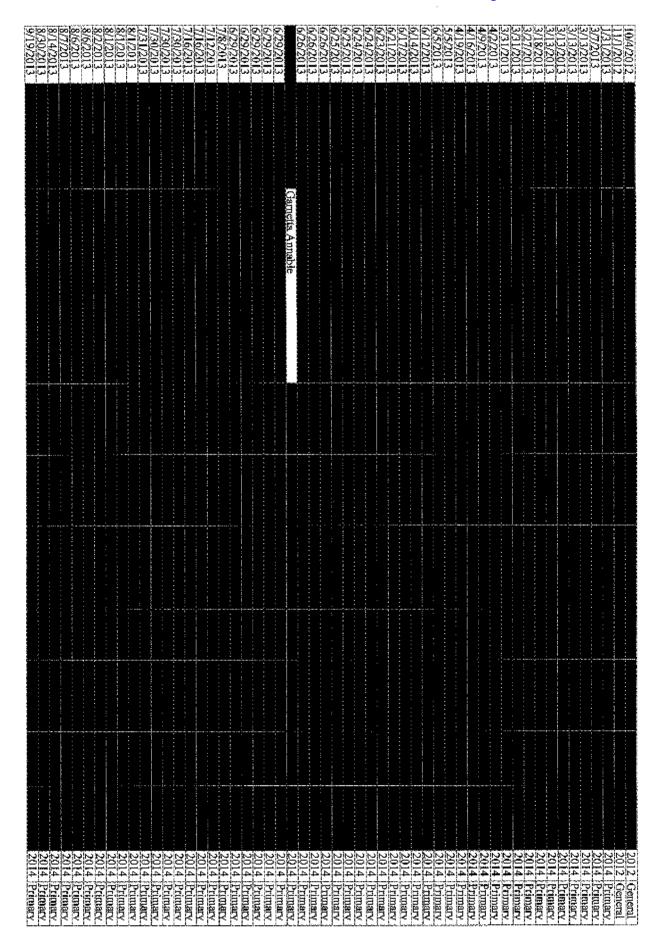
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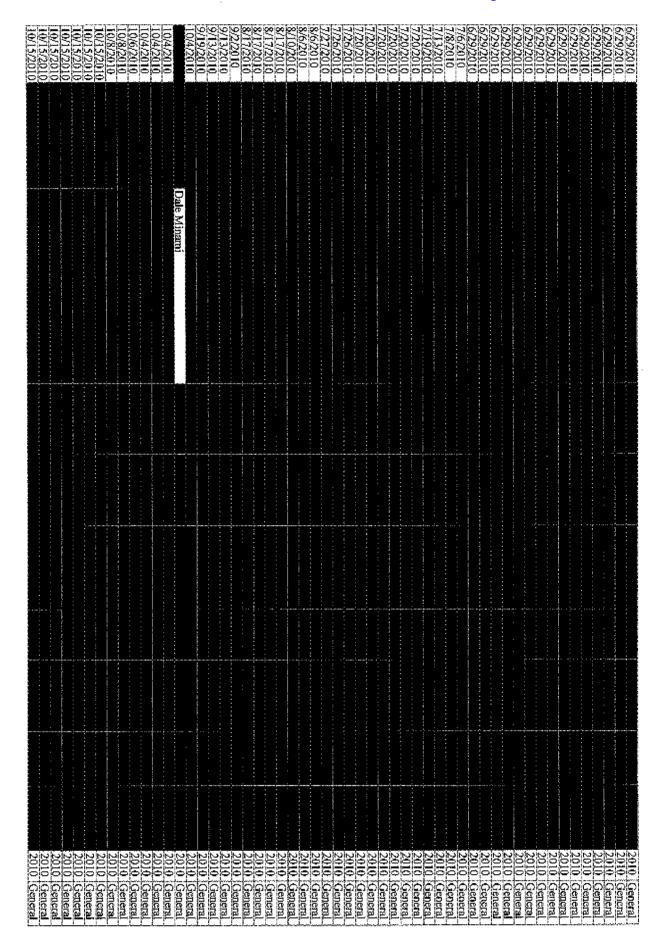


EXHIBIT 2

Committee/Candidate Details

Details for Candidate ID: H4CA12055

Operating Expenditures - KHANNA, ROHIT Contact Us Site Map **Export Options:** Metadata XML <u>CSV</u> **JSON** Prev 1 2 ... 66 67 68 69 70 71 72 73 74 75 ... 101 102 Next Total Result(s):2036 Payment Memo Payee Name Purpose City State Zio Amount PARRA-GARCIA, **SALARY SUNNYVALE** CA 94086 07/30/2014 \$1,224 SABRINA PARRA-GARCIA, SALARY **SUNNYVALE** CA 94086 08/14/2014 \$1,224 **SABRINA** PARRA-GARCIA, SALARY **SUNNYVALE** CA 94086 08/28/2014 \$1,224 SABRINA PARRA-GARCIA, **SALARY SUNNYVALE** CA 94086 09/15/2014 \$1,224 SABRINA PARRA-GARCIA, SALARY **SUNNYVALE** CA 94086 10/17/2014 \$1,224 SABRINA PARRA-GARCIA, **SALARY SUNNYVALE** CA 94086 10/31/2014 \$1,224 SABRINA PARRA-GARCIA, SALARY **SUNNYVALE** CA 11/07/2014 94086 \$1,224 SABRINA PARRA-GARCIA, SALARY **SUNNYVALE** CA 94086 10/02/2014 \$1,224 SABRINA PARTY FIESTA **EVENT** SAN JOSE CA 95126 06/04/2014 \$329 **BALLOON DECOR DECORATIONS** PARVIZSHAHI, **TRAVEL** MIRA LOMA CA 91752 01/10/2014 \$1,000 **BRIAN** STIPEND PARVIZSHAHI, **SALARY** MIRA LOMA CA 91752 01/30/2014 \$1,136 **BRIAN** PARVIZSHAHI, SALARY MIRA LOMA CA 91752 02/14/2014 \$1,136 BRIAN PARVIZSHAHI, SALARY MIRA LOMA CA 91752 02/28/2014 \$1,136 BRIAN PARVIZSHAHI, **SALARY** MIRA LOMA CA 91752 03/14/2014 \$1,136 BRIAN PARVIZSHAHI, SALARY MIRA LOMA CA 91752 04/02/2014 \$1,136 BRIAN PARVIZSHAHI, SALARY MIRA LOMA CA 91752 04/15/2014 \$1,136 BRIAN PARVIZSHAHI, SALARY MIRA LOMA CA 91752 04/30/2014 \$1,136 **BRIAN** PARVIZSHAHI, SALARY MIRA LOMA CA 91752 05/15/2014 \$1,136 BRIAN PARVIZSHAHI, SALARY MIRA LOMA CA 91752 05/30/2014 \$1,136 BRIAN PARVIZSHAHI, SALARY MIRA LOMA CA 91752 06/13/2014 \$1,136

BRIAN

Details for Candidate ID : H4CA12055

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Export Options:					<u>Metadata</u>	XML (CSV JSOI
Prev 1 2 6	7 68 69 70	71 72 73 74	[75] [76]	[101]	102 Next	Total F	Result(s):2036
Payee Name	Purpose	City	State	Zip	Payment Date	Amount	Memo Code
PARVIZSHAHI, BRIAN	SALARY	MIRA LOMA	CA	91752	07/02/2014	\$1,136	
<u>PARVIZSHAHI,</u> <u>BRIAN</u>	SALARY	MIRA LOMA	CA	91752	07/14/2014	\$1,136	
PARVIZSHAHI, BRIAN	SALARY	MIRA LOMA	CA	91752	07/30/2014	\$1,136	
PARVIZSHAHI, BRIAN	SALARY	MIRA LOMA	CA	91752	08/14/2014	\$1,136	
<u>PARVIZSHAHI,</u> BRIAN	SALARY	MIRA LOMA	CA	91752	08/28/2014	\$1,136	
<u>PARVIZSHAHI,</u> <u>BRIAN</u>	SALARY	MIRA LOMA	CA	91752	09/15/2014	\$1,136	
<u>PARVIZSHAHI,</u> BRIAN K	SALARY	MIRA LOMA	CA	91752	10/17/2014	\$1,136	
<u>PARVIZSHAHI,</u> BRIAN K	SALARY	MIRA LOMA	CA	91752	10/31/2014	\$1,136	
PARVIZSHAHI, BRIAN K	SALARY	MIRA LOMA	CA	91752	11/07/2014	\$1,136	
PARVIZSHAHI, BRIAN K	REIMBS - OFFICE EQUIPMENT	MIRA LOMA	CA	91752	11/07/2014	\$539	
<u>PARVIZSHAHI,</u> BRIAN K	SALARY	MIRA LOMA	CA	91752	10/02/2014	\$1,136	
PAYLESS CAR RENTAL	TRAVEL	ST PETERSBURG	FL	33713	04/12/2013	\$1,044	Χ
PDQ PRINTING OF LAS VEGAS	PRINTING	LAS VEGAS	NV	89103	11/12/2013	\$387	
PDQ PRINTING OF LAS VEGAS	PRINTING	LAS VEGAS	NV	89103	12/04/2013	\$63	
PDQ PRINTING OF LAS VEGAS	PRINTING	LAS VEGAS	NV	89103	01/10/2014	\$628	
PDO PRINTING OF LAS VEGAS	PRINTING	LAS VEGAS	NV	89103	01/10/2014	\$868	
PDO PRINTING OF LAS VEGAS	PRINTING	LAS VEGAS	NV	89103	01/27/2014	\$1,217	
PDO PRINTING OF LAS VEGAS	PRINTING	LAS VEGAS	NV	89103	04/07/2014	\$1,404	
PDQ PRINTING OF LAS VEGAS	PRINTING	LAS VEGAS	NV	89103	07/02/2014	\$14,503	
PDQ PRINTING OF LAS VEGAS	PRINTING	LAS VEGAS	NV	89103	07/02/2014	\$18,731	

Committee/Candidate Details

Details for Candidate ID: H4CA12055

Operating Expenditures - KHANNA, ROHIT Contact Us Site Map **Export Options:** Metadata XML **CSV** JSON Prev 1 2 ... 11 12 13 14 15 16 17 18 19 20 ... 23 24 Next Total Result(s):464 Payment Memo Payee Name Purpose Zip Amount **SOFTWARE** NGP VAN INC WASHINGTON DC 20005 08/21/2015 \$4,155 **SERVICES NURTURE KIDS FACILITY RENTAL FREMONT** CA 94538 04/15/2015 \$450 INC **OPEN SOCIETY MEDIA ADVERTISING CUPERTINO** CA 95014 05/18/2016 \$1,500 SERVICES INC PACIFIC GAS & UTILITIES **ELECTRIC SACRAMENTO** CA 04/21/2016 \$241 **COMPANY** PACIFIC GAS & **ELECTRIC** UTILITIES **SACRAMENTO** CA 95899 05/27/2016 \$92 **COMPANY PAPYRUS PRINTING** SAN JOSE CA 95110 04/14/2016 \$7,762 **PRINTING PAPYRUS PRINTING** SAN JOSE CA 95110 05/02/2016 \$13,429 **PRINTING PAPYRUS PRINTING** SAN JOSE CA 95110 05/20/2016 \$11,521 **PRINTING** PARVIZSHAHI, **REIMBS - TRAVEL** MIRA LOMA CA 91752 10/02/2015 \$858 BRIAN K CAMPAIGN PARVIZSHAHI, **ADMINISTRATIVE** MIRA LOMA CA 91752 10/02/2015 \$5,834 BRIAN K **SERVICES CAMPAIGN** PARVIZSHAHI, **ADMINISTRATIVE** MIRA LOMA CA 91752 11/02/2015 \$5,834 BRIAN K **SERVICES** PARVIZSHAHI, **REIMBS - TRAVEL** MIRA LOMA CA 91752 11/18/2015 \$595 BRIAN K **CAMPAIGN** PARVIZSHAHI, **ADMINISTRATIVE** MIRA LOMA CA 11/30/2015 \$5,834 **BRIAN K SERVICES** PARVIZSHAHI, **REIMBS - TRAVEL** MIRA LOMA CA 91752 12/14/2015 \$332 BRIAN K **CAMPAIGN** PARVIZSHAHI, **ADMINISTRATIVE** MIRA LOMA CA 91752 03/11/2015 \$5,834 BRIAN K **SERVICES CAMPAIGN** PARVIZSHAHI, **ADMINISTRATIVE CUPERTINO** CA 95014 01/04/2016 \$5,834 BRIAN K **SERVICES** PARVIZSHAHI, **REIMBS - TRAVEL CUPERTINO** CA 95014 01/20/2016 \$1,307 BRIAN K

SALARY

CUPERTINO

CA

95014 01/28/2016

\$2,300

9/16/2016

BRIAN K SALARY CUPERTINO CA 95014 02/12/2016 \$2,300 PARVIZSHAHI, BRIAN K SALARY CUPERTINO CA 95014 02/12/2016 \$2,300 Prev 1 2 11 12 13 14 15 16 17 18 19 20 23 24 Next Total Result(s):464	Prev 1 2								
BRIAN K CUPERTINO CA 95014 02/12/2016 \$2,300 PARVIZSHAHI, SALARY CUPERTINO CA 95014 02/12/2016 \$2,300	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	11 12 13 14	15 16 17 18 15	20	. 23 24	Next	Tota	al Result(s):464
SALARY CUPERTING CA 95014 02/12/2016 ¢2 300		SALARY	CUPERTINO	CA	95014	02/12/2016	\$2,300)	***************************************
BRIAN K PARVIZSHAHI, CALARY		SALARY	CUPERTINO	CA	95014	02/12/2016	\$2,300)	

Committee/Candidate Details

Details for Candidate ID: H4CA12055

Operating Expenditures - KHANNA ROHIT Contact Us Site Map Export Options: Metadata XML CSV JSON

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Prev [1] [2]	12 13 14 15 16	17 18 19 2	00 21 .	. 23 2	4 Next	Total Result(s):464
Payee Name	Purpose	City	State	Zip	Payment Date	Amount Memo Code
PARVIZSHAHI, BRIAN K	SALARY	CUPERTINO	CA	95014	02/29/2016	\$2,300
<u>PARVIZSHAHI,</u> <u>BRIAN K</u>	SALARY	CUPERTINO	CA	95014	03/15/2016	\$2,300
<u>PARVIZSHAHI,</u> <u>BRIAN K</u>	REIMBS - TRAVEL, FACILITY RENTAL	CUPERTINO	CA	95014	04/04/2016	\$1,892
<u>PARVIZSHAHI,</u> <u>BRIAN K</u>	SALARY	CUPERTINO	CA	95014	04/04/2016	\$2,300
<u>PARVIZSHAHI,</u> <u>BRIAN K</u>	SALARY	CUPERTINO	CA	95014	04/14/2016	\$2,300
<u>PARVIZSHAHI,</u> <u>BRIAN K</u>	REIMBS - TRAVEL	CUPERTINO	CA	95014	04/15/2016	\$460
<u>PARVIZSHAHI,</u> <u>BRIAN K</u>	SALARY	CUPERTINO	CA	95014	04/28/2016	\$2,300
PARVIZSHAHI, BRIAN K	SALARY	CUPERTINO	CA	95014	05/12/2016	\$2,300
<u>PARVIZSHAHI,</u> <u>BRIAN K</u>	CAMPAIGN ADMINISTRATIVE SERVICES	MIRA LOMA	CA	91752	04/03/2015	\$5,834
<u>PARVIZSHAHI,</u> <u>BRIAN K</u>	CAMPAIGN ADMINISTRATIVE SERVICES	MIRA LOMA	CA	91752	04/30/2015	\$5,834
<u>PARVIZSHAHI,</u> <u>BRIAN K</u>	CAMPAIGN ADMINISTRATIVE SERVICES	MIRA LOMA	CA	91752	06/01/2015	\$5,834
<u>PARVIZSHAHI,</u> BRIAN K	SALARY	CUPERTINO	CA	95014	05/31/2016	\$2,300
<u>PARVIZSHAHI,</u> <u>BRIAN K</u>	SALARY	CUPERTINO	CA	95014	06/14/2016	\$2,300
<u>PARVIZSHAHI,</u> <u>BRIAN K</u>	CAMPAIGN ADMINISTRATIVE SERVICES	MIRA LOMA	CA	91752	07/01/2015	\$5,834
<u>PARVIZSHAHI,</u> <u>BRIAN K</u>	CAMPAIGN ADMINISTRATIVE SERVICES	MIRA LOMA	CA	91752	07/31/2015	\$5,834
<u>PARVIZSHAHI,</u> <u>BRIAN K</u>	CAMPAIGN ADMINISTRATIVE SERVICES	MIRA LOMA	CA	91752	08/31/2015	\$5,834
PDQ PRINTING OF LAS VEGAS	PRINTING	LAS VEGAS	NV	89103	10/16/2015	\$4,153
PDQ PRINTING OF LAS VEGAS	PRINTING	LAS VEGAS	NV	89103	03/18/2016	\$1,142

1 2 3 4 5 6 7	BUSINESS, E 5655 Silver Cr San Jose, CA Telephone: 41 Email: Dutta(15.236.2048; Fax: 213.405.24 @BusinessandElectionLaw.com Plaintiff A FOR CONGRESS	16 <u>n</u>
8			ES DISTRICT COURT
9	N	NORTHERN DISTRICT OF C	ALIFORNIA, SAN JOSE DIVISION
10		A FOR GOVERNESS	L GAGRAYO
11	MIKE HOND	A FOR CONGRESS,	CASE NO.
12		Plaintiff,	JUDGE: TBD
13 14	vs. BRIAN PARV	/IZSHAHI, et al.	DECLARATION OF GAUTAM DUTTA IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY
15		Defendants.	INJUNCTION
16			Hearing Date: TBD
17	I, Gautam Dutta	a, declare as follows:	
18	1.	I am an attorney licensed to pra	actice in the State of California, and represent
19]	Plaintiffs in this case.	
20	2.	I am not a party in this action.	I make this Declaration of my own personal
21	1	knowledge. If called as a witne	ess, I could and would testify competently to the
22	t	truth of the matters set forth in	this Declaration.
23	3.	Plaintiff Mike Honda for Cong	ress is an unincorporated political association with
24	i	its principal place of business i	n Santa Clara County, California.
25	4. 1	Upon information and belief, D	Defendant Brian Parvizshahi works from a place of
26	1	business located in Santa Clara	County, California.
27	5.	Defendant Ro for Congress, In	nc., a California corporation that was incorporated
28			
			DUTTA DECLARATION

1 2 3 4 5 6 7 8	in 2011, conducts business from and maintains an office in Santa Clara County, California. 6. Upon information and belief, Defendant Rohit "Ro" Khanna is a resident of Alameda County, and works from a place of business located in Santa Clara County. I declare under penalty of perjury that the foregoing is true and correct. Executed on Sept. 21, 2016.
10	
11	
12	By: <u>/s/ Gautam Dutta</u>
13	GAUTAM DUTTA
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Case 5:16-cv-05416 Document 5-31 Filed 09/22/16 Page 2 of 2

1 2 3 4 5 6	5655 Silver San Jose, Ca Telephone: Email: <u>Dutt</u>	ta, Esq. (State Bar No. 199326), ENERGY, AND ELECTION L. Creek Valley Rd # 900 A 95138 415.236.2048; Fax: 213.405.241 a@BusinessandElectionLaw.com or Plaintiff TDA FOR CONGRESS	16
7 8		UNITED STATE	ES DISTRICT COURT
9			ALIFORNIA, SAN JOSE DIVISION
10		NORTHERN DISTRICT OF C.	ALIFORNIA, SAN JOSE DIVISION
	MIKE HON	TO A FOR CONCREGG	CASENO
11	MIKE HON	DA FOR CONGRESS,	CASE NO.
12		Plaintiff,	JUDGE: TBD
13	VS.		DECLARATION OF BILL O'DAY IN SUPPORT OF PLAINTIFF'S
14	BRIAN PAI	RVIZSHAHI, et al.	MOTION FOR PRELIMINARY INJUNCTION
15		Defendants.	Hearing Date: TBD
16			č
17			
18	I, Bill O'Day	, declare as follows:	
19		MY BACK	GROUND
20	1.	By way of background, I am Se	enior DevOps Engineer for a Cambridge,
21		Massachusetts company that he	elps retail businesses reduce shoplifting and
22		employee theft. I drafted this s	tatement on my own personal time.
23	2.	I have a bachelor's degree in C	omputer Science from the University of Rhode
24		Island.	
25	3.	DevOps (an amalgam of the wo	ords "development" and "operations") makes it
26		possible to build, test, and relea	se software rapidly, frequently, and more reliably,
27		by harmonizing the efforts of so	oftware developers and other IT professionals.
28		Among my current responsibili	ties is the design and implementation of security
			O'DAY DECLARATION

- and auditing frameworks.
- 4. Earlier, I served as Director of IT for two nonprofits: Jewish Community Housing for the Elderly (in Brighton, Massachusetts) and American Society of Law, Medicine & Ethics (in Boston, Massachusetts).
- 5. In those roles, I handled the overarching information infrastructure. One of which, a multisite housing community that had a majority of residents receiving some form of affordable housing assistance putting a high value on maintaining the integrity of resident and applicant data, while allowing for sharing when required.
- I make this Declaration of my own personal knowledge, and, if called as a witness,
 I could and would testify competently to the truth of the matters set forth in this
 Declaration.

MY EXPERIENCE WITH DROPBOX

- 7. Dropbox is a cloud (online) storage service that is frequently used for sharing and synchronizing files.
- 8. I have used Dropbox professionally and personally in multiple teams to effectively work together and keep resources current amongst a group of people. I have used this software to manage projects over a period of four to five years. I have administered file sharing using the software throughout my career.

MY EXPERIENCE WITH AUDITING AND FORENSICS

- 9. Throughout my career, I have provided forensic auditing of changes to files and directories local to a computer, an internal network, and on cloud-based file systems like Dropbox.
- 10. I have most often performed forensic work in connection with corporate and organizational human relations (HR), as well as with in-house training situations.

THE CREATION, USAGE, AND PERMANENCE OF DROPBOX ACCOUNTS

11. A Dropbox account is created using at least the following pair: a person's "username" and password.

- 12. This access granted to the person using that username is unique.
- 13. For example, suppose that one Dropbox account is created and then deleted, and later a second account is created with the *same* username. In that scenario, the access to the shared data of the first account would *not* be accessible to the second account.
- 14. Each Dropbox account has the ability to tie the account to an arbitrary number of computers. Each computer would have an alias (nickname) assigned to it.
- 15. Data on Dropbox is shared by means of "user permissions". For example, if user1@example.com authorizes access to a shared folder (titled "SHARES") to user2@example.com, user2 would be able to access all files in SHARES from all devices until that access is withdrawn by user1.

SHARING INFORMATION ON DROPBOX: "EDITED", "REMOVED", AND "ADDED".

- 16. In a shared folder, all authorized users are granted access as "permissioned" (generally, read-only access or full access).
- 17. Any changes to a file is recorded on Dropbox as "In <Shared Folder Name>, <user> <action> <filename>."
- 18. There are three main types of "actions" that can be made to a Dropbox file. A file can be "edited", "removed", or "added".
- 19. An "edited" action means that the file had a new (updated) version of itself uploaded to the shared location within the Dropbox account. "Edited" often means that the file was *last* viewed by a user at the time the "edited" action was recorded on Dropbox.
- 20. Notably, just because a file has been edited does not necessarily mean that the *content* of the file has changed. Many files have additional "metadata" stored in them: information keeping track of edits, summary information, view information, and other information relating to the state of a document outside of the content itself.

- 21. Such metadata is therefore much more volatile. For example, changing a Word document from "Print" view to "Draft" view would constitute a change in state and would be saved and recorded on Dropbox *even if* nothing else occurred.
- 22. A file that was "edited" was definitely opened by the Dropbox user. More could have been done to the file; but the "edited" marker indicates, at the very least, that the file was opened.
- 23. A "removed" action means that the file was removed from the shared location within the Dropbox account.
- 24. An "added" action means that a new file was added to the shared location within the Dropbox account.
- 25. In my forensic experience, Dropbox files labeled as "added" are the most interesting, for those files are the ones with which that person making the change spent the most time.
- 26. If a Dropbox file shows an action of "added" and that file had existed *before* the "added" action occurred, it means that the file was (a) removed from the shared location within the Dropbox account, and then (b) was *re*-added (i.e., was moved back) to the shared location within the Dropbox account.
- 27. In my experience, this scenario most often occurs when someone has *removed* the file to another location (e.g., his or her desktop) and then *moved the file back* to the shared location within the Dropbox account.

MEANING OF THE "DESKTOP" LABEL IN "ADDED" OR "EDITED" ACTIONS

- 28. When Dropbox shows that a file has been "added" or "edited", a label of "Desktop" or "Website" appears on the same line. That label ("Desktop" or "Website") shows the *source* of the action that was taken.
- 29. If the label is "Desktop", hovering over this label will reveal the alias (nickname) of the computer used to make the edits.
- 30. If more than one alias is seen, it means that (1) more than one computer was used

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to make the edits, and (2) the user had authorized a number of computers to access both his or her personal Dropbox account and, by extension, any shared folders tied to that account. I declare under penalty of perjury that the foregoing is true and correct. Executed on Sept. 18, 2016. By: /s/ Bill O'Day

BILL O'DAY

O'DAY DECLARATION

- 5 -

1 2 3 4 5	Gautam Dutta, Esq. (State Bar No. 199326 BUSINESS, ENERGY, AND ELECTION 5655 Silver Creek Valley Rd # 900 San Jose, CA 95138 Telephone: 415.236.2048; Fax: 213.405.2 Email: <u>Dutta@BusinessandElectionLaw.c</u> Attorneys for Plaintiff MIKE HONDA FOR CONGRESS	LAW, PC 2416
6		
7		
8	UNITED STA	TES DISTRICT COURT
9	NORTHERN DISTRICT OF	CALIFORNIA, SAN JOSE DIVISION
10		
11	MIKE HONDA FOR CONGRESS,	CASE NO.
12	Plaintiff,	JUDGE: TBD
13	VS.	DECLARATION OF MADALENE XUAN- TRANG MIELKE IN
14 15	BRIAN PARVIZSHAHI, et al. Defendants.	SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION
16	_ genuums:	Hearing Date: TBD
17		<u> </u>
18 19	I, Madalene Xuan-Trang Mielke, declare as	follows:
20	MY BAC	KGROUND
21	1. I am Founder and Principal o	of Arum Group, LLC, which is located on Capitol Hill
22	in Washington DC.	
23	2. I have nearly 20 years of exp	erience working on political campaigns and specialize
24	in fundraising for political ca	indidates, groups, and nonprofits, as well as political
25	training focusing on the adva	incement of people of color.
26	3. I have collaborated with a nu	mber of groups and campaigns, including the
27	NAACP National Voter Fund	d, John Kerry for President, and Friends of Hillary.
28	4. I have been a featured speake	er at many conferences and meetings including the
		MIELKE DECLARATION

American Medical Association (AMA), Asian Pacific American Institute for Congressional Studies (APAICS), Conference on Asian American Leadership (CAPAL), and many other organizations and nonprofits.

- 5. I earned my degree in Political Science from Tulane University.
- 6. I make this Declaration of my own personal knowledge, and, if called as a witness, I could and would testify competently to the truth of the matters set forth in this Declaration.

OUR WORK FOR MIKE HONDA FOR CONGRESS

- 7. On April 25, 2005, Mike Honda for Congress and I entered into an agreement (the "Agreement"), whereby I became the fundraising consultant to Mike Honda for Congress.
- 8. I have attached, as Exhibit 3, a true and accurate copy of Agreement (with sensitive financial information redacted). Both Mike Honda for Congress and I signed the same document (I cannot currently locate the hard copy of the signed Agreement).
- 9. Pursuant to the Agreement (art. VI), Mike Honda for Congress solely or jointly owned all information (including fundraising and donor information) developed during the term of the Agreement. All such information was deemed "confidential" and was required to be held "in absolute confidence".
- After Arum Group was incorporated, my role as fundraising consultant under the Agreement was transferred to Arum Group.
- 11. Pursuant to the terms of the Agreement, Arum Group served as fundraising consultant to Mike Honda for Congress until December 2014.
- 12. Alison Woodworth, who had interned for Arum Group as an undergraduate student, joined Arum Group as Finance Associate in July 2011.
- 13. After she joined Arum Group, I worked closely with Ms. Woodworth in managing our fundraising work for Mike Honda for Congress.

1		ARUM GROUP'S INTERNSHIPS
2	14.	Ms. Woodworth's responsibilities included hiring and supervising interns.
3	15.	Arum Group recruits its interns from a pool of recent college graduates or college
4		students. Typically, the interns work through the summer, on a full-time (40 hours
5		per week) basis.
6	16.	Ms. Woodworth hired and supervised three or four interns for Summer 2012. One
7		of those interns was Brian Parvizshahi.
8	17.	Arum Group interns are required to sign an Internship Agreement, which contains
9		a non-disclosure agreement (NDA) with respect to Arum Group's confidential,
0		client-related information.
11	18.	Interns were given access to some of Arum Group's confidential client
12		information. With respect to Congressmember Honda, that information included
13		private, highly sensitive contact and donation information of his donors.
4	19.	For reference, I have attached, as Exhibit 1, a true and accurate copy of Arum
15		Group's standard Internship Agreement (with the intern's name redacted).
16	20.	In relevant part, the Internship Agreement stated:
17		1. You agree that you will not in any way discuss information obtained in connection with your position with the Arum Group outside of the Arum Group's clients.
19 20 21 22		2. You will treat any confidential or non-public information provided to you by the Arum Group as <i>strictly confidential</i> . Any dissemination or discussion regarding such confidential information is <i>prohibited</i> with anyone outside of the Arum Group, unless permission to disseminate or discuss such information is granted. This confidentiality requirement <i>shall survive the termination of this agreement</i> . ¹
23		ARUM GROUP'S DROPBOX ACCOUNT
24	21.	Dropbox is a password-protected cloud (online) storage service that is frequently
25		used for sharing and synchronizing files.
26	22.	Pursuant to the Agreement's requirement to protect confidential information,
27 28	1 Italic	s added.
		MIELKE DECLARATION

- Arum Group housed, on Dropbox, some of its confidential, client-related information relating to Mike Honda for Congress.
- 23. Pursuant to Arum Group's NDA, interns are given access to certain client folders and files that are housed in Arum Group's Dropbox account.
- 24. I did not administer or manage Arum Group's Dropbox account, files, or folders.
 Instead, I delegated that task to Ms. Woodworth, who at the time was my Finance Associate.
- 25. Ms. Woodworth left her position at Arum Group in December 2012. After she left, I delegated to another Finance Associate the responsibility of administering and managing Arum Group's Dropbox account, files, and folders.

MR. PARVIZSHAHI'S BRIEF TENURE AT ARUM GROUP

- 26. Brian Parvizshahi began what was intended to be his summer-long internship at Arum Group in May 2012.
- 27. In May 2012, Mr. Parvizshahi signed an Internship Agreement, which contained an identical NDA provision as the standard Internship Agreement discussed above.
- 28. I cannot locate the hard copy of the Internship Agreement that Mr. Parvizshahi signed (hereinafter, the "Parvizshahi Agreement"). In 2012, Arum Group did not keep electronic backups of Internship Agreements (Arum Group now does keep electronic backups of its files).
- 29. The Parvizshahi Agreement contained the same NDA as Arum Group's standard Internship Agreement discussed above and reprinted as Exhibit 1.
- 30. Shortly after joining Arum Group, Mr. Parvizshahi abruptly resigned from his internship.
- June 8, 2012 was Mr. Parvizshahi's last day with Arum Group.
 MAY 31, 2016 DISCOVERY REGARDING THE DROPBOX ACCESS LIST
- 32. In December 2014, Arum Group ended its role as the fundraising consultant for Mike Honda for Congress.

- 33. On May 31, 2016, I received an email from Sudip Dutta, who at the time was Finance Director for Mike Honda for Congress. In that email, Mr. Dutta inquired regarding the status of a Dropbox folder pertaining to Mike Honda for Congress.
- 34. I have attached, as Exhibit 2, a true and accurate copy (with email addresses redacted) of an email chain containing Mr. Dutta's May 31, 2016 email and my response to his email.
- 35. Shortly after receiving Mr. Dutta's email, I accessed Arum Group's Dropbox account and checked the names that were on the access list for the folders pertaining to Mike Honda for Congress.
- 36. In so doing, I discovered, for the first time, that Mr. Parvizshahi's name had inadvertently not been removed from the Dropbox access list for the folders and files pertaining to Mike Honda for Congress.
- 37. At the time, I was aware that Mr. Parvizshahi was campaign manager of Ro Khanna's campaign against Congressmember Honda.
- 38. In response, I promptly removed Mr. Parvizshahi from the Dropbox access list.
- 39. Subsequently, I sent an email (*attached as* Exhibit 2) to Mr. Dutta on May 31, 2016.
- 40. In that email, I stated that (1) Mr. Parvizshahi had not been previously removed from the Dropbox access list, and (2) upon discovering that inadvertent oversight, I had removed Mr. Parvishahi's name from the Dropbox access list.
- 41. On Aug. 31, 2016, I briefly accessed, on Dropbox, the following spreadsheet file in the Honda folder: "030514 MH Contribution 2008-2014.xls". I did not change any of the data or contents in that spreadsheet file.
- 42. To date, I have not emailed, texted, or spoken with Mr. Parvizshahi since the end of June 2012.

1	I declare under penalty of perjury that the foregoing is true and correct. Executed on
2	Sept. 20, 2016.
3	By: /s/ Madalene Xuan-Trang Mielke
4	MADALENE XUAN-TRANG MIELKE
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	- 6 - MIELKE DECLARATION

EXHIBIT 1

ARUM GROUP, LLC

625 THIRD STREET, NE SUITE 2 . WASHINGTON, DC 20002 PHONE: 202.547.6656 • FAX: 202.547.8554

September 15, 2014

Dear M.

We are pleased to offer you an internship position with the Arum Group, LLC. Your work schedule has been established as Mondays and Thursdays 3PM-6PM and Fridays 1PM-6PM. Your first day of work is on Monday, September 15, and your last day is on November 17, 2014.

Please understand, in addition, that your internship with us is subject to the following provisions:

- 1. You agree that you will not in any way discuss information obtained in connection with your position with the Arum Group outside of the Arum Group's clients.
- 2. You will treat any confidential or non-public information provided to you by the Arum Group as strictly confidential. Any dissemination or discussion regarding such confidential information is prohibited with anyone outside of the Arum Group, unless permission to disseminate or discuss such information is granted. This confidentiality requirement shall survive the termination of this agreement.
- 3. Your internship will be on an "at-will" basis. That means that while you may have tentative availability dates, you are free to leave at any time and for any reason, just as the Arum Group may bring the internship relationship to an end at any time and for any

Please sign this letter and return an original copy to me for our files. We look forward to working with you.

low tur

Sincerely,

Principal

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From: **Madalene Mielke** <REDACTED> Date: Tue, May 31, 2016 at 10:37 AM

Subject: Re: Madalene made changes in your shared folders

To: Sudip Dutta < REDACTED>

This is a folder that I gave to Randy Broz when he started so he has the files. I actually went in and looked to see who else was on the list and you're not on there so I can share with you. The funny thing is that Brian Parvizshahi was once my intern for a hot minute a long long time ago and he was still on the access list. I removed him from it.

Madalene Xuan-Trang Mielke Founder & Principal Arum Group, LLC 625 3rd St. NE Suite #2 Washington, DC 20002 (202) 547-6656 – phone www.arumgroup.com @(TWITTER HANDLE REDACTED)

From: Sudip Dutta <REDACTED>

Date: Tuesday, May 31, 2016 at 1:24 PM **To:** Madalene Mielke <REDACTED>

Subject: Fwd: FW: Madalene made changes in your shared folders

Madalene:

We got a notification for this - see below. I haven't been in our Dropbox in a while and I wanted to ask if this is this a folder that still exists in the Dropbox - we can't find it.

Best.

Sudip Dutta
Finance Director
Mike Honda for Congress
(408) 641-1717 Office
REDACTED Cell
www.mikehonda.com/contribute

From: Dropbox <no-reply@dropboxmail.com>
Date: May 28, 2016 at 12:34:53 AM EDT
To: REDACTED@abconsultingdc.com

Subject: Madalene made changes in your shared folders



AGREEMENT FOR PROFESSIONAL SERVICES BY AND BETWEEN MADALENE MIELKE AND MIKE HONDA FOR CONGRESS COMMITTEE

THIS AGREEMENT entered into and made effective the 25th day of April, 2005, by and between Contractor and Honda for Congress Committee.

Article I: Scope of Work

- A. Contractor hereby undertakes to provide Honda for Congress faithfully, and to the best of her ability, with consulting services for the purpose of raising campaign funds which includes providing certain data, equipment and supplies, which Contractor in her sole discretion deems necessary for the task of raising campaign funds.
- **B.** Contractor shall provide the following services:
 - 1. Develop, oversee, and implement 2005- 2006 development plan to include in district (California), DC PAC and national fundraising;
 - 2. Train and counsel Candidate and appropriate campaign staff in its system and fundraising techniques;
 - 3. Provide advice and assistance to Honda for Congress for fundraising purposes as requested by the Candidate;
 - 4. Develop and implement direct mail solicitation program, including drafting fundraising letters and other correspondence;
 - 5. Develop donor profiles, histories and background information;
 - 6. Develop lists and list strategies;
 - 7. Provide Honda for Congress with progress reports, as requested;
 - 8. Handle all fundraising event logistics;
 - 9. Handle all post-event follow-up, including thank you correspondence; and
 - 10. Vet all contributions received for legal compliance, including providing all corresponding documents needed for filing FEC reports in a timely manner.

Article II: Scope of Authority

A. Honda for Congress agrees to work within Contractor's system, to consult with Contractor on all matters directly or indirectly affecting fundraising and to respect Contractor's judgment on matters pertaining to political fundraising. The parties mutually agree, that because Honda for Congress has engaged Contractor for the purpose, among others, of using its best judgment, conduct of all matters within the scope of the engagement shall remain in Contractor's discretion, and Honda for Congress will defer to Contractor's decisions regarding fundraising, so long as such conduct or decisions and the actions following comply with all relevant campaign or other law.

B. Any written correspondence, fundraising solicitations, newsletters, letters sent out on a mass basis must be reviewed and approved by Candidate (or through his Chief of Staff), prior to public release (excepting individual letters).

Article III: Independent Contractor

It is understood and agreed by that Madalene Mielke, in the performance of this agreement, shall act as and be an independent contractor and shall have no authority whatsoever to incur any liability or expense on behalf of Honda for Congress without the prior approval of Honda for Congress.

Article IV: Time of Performance

Services to be provided by Contractor will begin on the 1st day of January 2005, and shall continue to provide its services, until December 31, 2005, unless terminated earlier on written notice of the parties under the provisions of Article V, or unless it is extended, renewed or amended upon written agreement of the parties.

Article V: Cancellation

- **A.** This agreement may be terminated by either party without cause for any reason, upon 30 days written notice.
- **B.** Termination shall not affect all obligations of Honda for Congress for services rendered through date of termination, including but not limited to, all fees and expenses incurred prior to and including the date of termination. Upon written notice of cancellation by either party, all fees paid to Contractor, regardless of source, shall be considered fully earned, and no refund or rebate to the Honda for Congress will be required.
- C. Once the agreement is terminated under this Article, upon receiving such notice, Contractor shall not commence any new work. All other rights and duties, including payment of fees, shall continue during the notice period.

Article VI: Data Ownership

- A. Data supplied by Contractor, including contributor information, remain the sole property of Contractor. Information regarding individuals targeted by the Honda for Congress for solicitation may be used by Honda for Congress without restriction.
- **B.** Other information developed in the course of the campaign, from whatever source derived, becomes the property of Contractor and Honda for Congress, and may be used by either without restriction.

- C. The database provided by Honda for Congress, including all lists and donor information, prior to this agreement, are and will remain the sole property of Honda for Congress.
- **D.** Information which is personal to Honda for Congress shall be deemed confidential and shall be held in absolute confidence by Contractor.

Article VII: Compensation

- A. As consideration for services performed and to be performed by Contractor under this Agreement, Honda for Congress agrees to pay Contractor the following sums of money:
 - 1. Monthly Fee. The sum of REDACTED per month shall be payable in advance of the 1st of each month, and Contractor shall submit an invoice on a monthly basis to Honda for Congress for said monthly fees.
 - 2. Expenses. Honda for Congress agrees to reimburse Contractor for all ordinary and reasonable expenses incurred on Honda for Congress's behalf, including but not limited to, telephone and printing costs, parking, campaign related travel including round-trip travel expenses and hotel accommodations for Contractor, local travel and round-trip shipping costs for such equipment and supplies as Contractor deems necessary. Expenses exceeding \$300.00 to be preapproved by Candidate or appropriate campaign representative. All expenses shall be documented by copies of invoices or statements issued by the vendors. Expenses are due and payable upon receipt of invoice. Contractor shall submit an invoice of expenses on a monthly basis to Honda for Congress for reimbursement.
 - 3. Payments by the Committee. Contractor agrees that payment of all of the obligations of Honda for Congress may be made either by Candidate directly, or by Honda for Congress on behalf of Candidate. To the extent that all obligations hereunder are satisfied by payments made by Honda for Congress, then the Candidate shall be deemed to have fully satisfied all obligations to Contractor. To the extent that the Honda for Congress fails to make any payments required hereunder, the Candidate shall remain obligated to Contractor for such payments.
- B. Satisfactory payment of the monthly fee for each month, including reimbursement of all expenses, is a condition precedent to Contractor continuing to provide its services. Failure to compensate Contractor, without further notice or demand, on the dates and as contemplated herein shall be a material breach of this Agreement, but in no way relieves Honda for Congress of obligations for payment of fees or expenses called for in this contract. It is further agreed that time is of the essence in Honda for Congress's fulfilling all of its financial obligations.

C. Should Honda for Congress breach this contract by reason of nonpayment, Contractor may immediately cease fundraising activities on behalf of Honda for Congress and withdraw or impound any and all fundraising materials, information and resources from whatever source derived. Breach of contract for nonpayment will be deemed to have occurred should payment not be received within fifteen days of the due date.

Article VIII. Assignment of Agreement

The obligations under this Agreement are personal in nature and are not assignable to any other person or entity without prior written consent of the other party.

Article IX. General

- A. In the event that any provisions of this Agreement shall be held to be invalid and unenforceable, the remaining provisions shall be valid and binding upon the parties. A waiver by either party of any breach of any provision, term or covenant of this Agreement shall not be construed as a waiver of any subsequent breach of the Agreement by the other party.
- **B.** This agreement shall be governed by and construed and enforced in accordance with the laws of Washington, DC.
- C. Any legal actions arising out of the interpretation and/or performance of this Agreement shall be brought only in a court of competent jurisdiction in Washington, DC, and Honda for Congress agrees that the courts of Washington, DC have personal jurisdiction over Honda for Congress.
- In connection with any audit or investigation of Honda for Congress by the D. Federal Election Commission or any other government agency and to the extent such simultaneous representation is not barred by the rules of the District of Columbia bar or any other such applicable rules, the attorneys for Honda for Congress, at the sole cost and expense of the Candidate, shall provide, if Contractor at the time so requests, all necessary or appropriate legal advice and representation, to the extent that such attorneys are experienced in the legal areas covered by the audit or inquiry, to Contractor in connection with the audit or investigation, including, but not limited to, the manner in which Contractor shall respond to document requests or subpoenas and representation at hearings, depositions of the officers, directors and employees of Contractor, or at any other appearance before any board, commission, committee, panel, or other body, provided, however, that such counsel shall not be given or required if (1) such counsel or representation shall interfere with, conflict with, or otherwise disable counsel from representing Honda for Congress or (2) if Contractor elects to utilize separate counsel of its own choosing. Such agreement to provide counsel shall not constitute a duty to defend, and, if attorneys representing Honda for Congress

at the time of the inquiry or audit cannot simultaneously represent Contractor, Honda for Congress shall have no obligation to obtain substitute counsel for Contractor, and Contractor may at her own election and expense retain separate counsel. This covenant to provide counsel to Contractor shall not apply if the audit or investigation arises in whole or in substantial part from the alleged negligence or other alleged breach of this Agreement by the Contractor.

E. Any notice or other communication required or permitted hereunder shall be in writing and shall be deemed effective when delivered in person, or if mailed, on the date of deposit in the mail, postage prepaid, addressed, to the addresses set forth below, or any other address as shall have been specified in writing by either party.

Article X. Extent of Agreement

This agreement represents the entire and integrated agreement between Contractor and Honda for Congress and supersedes all prior negotiations, representations or agreements, either written or oral. This agreement may be amended, supplemented or modified only by written instrument signed by both parties.

Article XI. Effect of Partial Validity

The invalidity of any portion of this Agreement will not and shall not be deemed to affect the validity of any other provision. In the event that any provision of this Agreement is held to be invalid, the parties agree that the remaining provisions shall be deemed to be in full force and affect as if both parties subsequent to the expurgation of the invalid provision had executed them.

IN WITNESS THEREOF the signature of the parties hereto which are effective on the day and year first above written.

Mike Honda for Congress P.O. Box 3018	Contractor 625 Third Street, NE
Santa Clara, CA 95055	Washington, DC 20002
Attest:	
Ву:	Ву:
Date	Date

1 2 3	Gautam Dutta, Esq. (State Bar No. 199326) BUSINESS, ENERGY, AND ELECTION LAW, PC 5655 Silver Creek Valley Rd # 900 San Jose, CA 95138 Telephone: 415.236.2048; Fax: 213.405.2416								
4	Email: <u>Dutta@BusinessandElectionLaw.co</u>	<u>om</u>							
5	Attorneys for Plaintiff MIKE HONDA FOR CONGRESS								
6	MIKE HONDA FOR CONGRESS								
7									
8	UNITED STAT	TES DISTRICT COURT							
9	NORTHERN DISTRICT OF	CALIFORNIA, SAN JOSE DIVISION							
10									
11	MIKE HONDA FOR CONGRESS,	CASE NO.							
12	Plaintiff,	JUDGE: TBD							
13	VS.	DECLARATION OF ALISON WOODWORTH IN SUPPORT							
14	BRIAN PARVIZSHAHI, et al.	OF PLAINTIFF'S MOTION FOR PRELIMINARY							
15	Defendants.	INJUNCTION							
16		Hearing Date: TBD							
17									
18	I, Alison Woodworth, declare as follows:								
19	MY BAC	KGROUND							
20	1. By way of background, I am	Manager of Finance and Administration at the							
21	O'Neill Institute for National	and Global Health Law at Georgetown University							
22	Law Center in Washington, D	OC.							
23	2. I earned bachelor's degrees in	Political Science and Journalism from Miami							
2425	University.								
26	3. I am currently enrolled at Geo	orgetown University's McDonough School of							
27	Business, and expect to receive	ve an M.B.A. in 2017.							
28	4. Prior to joining Georgetown l	Law, I was a Finance Associate at Arum Group, LLC,							
		WOODWORTH DECLARATION							

- where I worked from July 2011 to December 2012.
- I make this Declaration of my own personal knowledge, and, if called as a witness,
 I could and would testify competently to the truth of the matters set forth in this
 Declaration.

MY WORK AT ARUM GROUP

- 6. I served as Finance Associate at Arum Group, LLC from July 2011 through
 December 2012. Previously, I served as Finance Intern for Arum Group while
 pursuing my undergraduate degree at Miami University.
- 7. Arum Group is a consulting firm that specializes in fundraising for political candidates, groups, and nonprofits.
- 8. During my tenure at Arum Group, Mike Honda for Congress was one of Arum Group's principal clients.

ARUM GROUP INTERNS

- 9. As Finance Associate, my responsibilities included hiring and supervising interns.
- 10. Arum Group recruited its interns from a pool of recent college graduates or college students. Typically, the interns worked through the summer, on a full-time (40 hours per week) basis.
- 11. I hired and supervised three or four interns for Summer 2012. One of those interns was Brian Parvizshahi.
- 12. As part of their internship, interns typically assisted with and attended with Congressmember Honda's "call time" sessions. During call time, U.S. Senators and Members of Congress call current and potential campaign donors while using a non-government phone line from non-federal property.

INTERNS' ACCESS TO ARUM GROUP'S CONFIDENTIAL INFORMATION

13. Interns were given access to some of Arum Group's confidential, client-related information. With respect to Congressmember Honda, that information included private, highly sensitive contact and donation information of his donors.

	Case 5:16-cv-05416 Document 5-17 Filed 09/22/16 Page 4 of 4
1 2 3 4 5 6 7 8	Dropbox account was inadvertently not withdrawn. 26. I left my position at Arum Group in December 2012. 27. To date, I have not emailed, texted, or spoken with Mr. Parvizshahi since the end of June 2012. I declare under penalty of perjury that the foregoing is true and correct. Executed on Sept. 17, 2016.
9 10 11	By: /s/ Alison Woodworth
12 13	ALISON WOODWORTH
14 15 16	
17 18	
19 20 21	
22 23	
24 25	

27

1 2 3 4 5 6	Gautam Dutta, Esq. (State Bar No. 199326) BUSINESS, ENERGY, AND ELECTION LAW, PC 5655 Silver Creek Valley Rd # 900 San Jose, CA 95138 Telephone: 415.236.2048; Fax: 213.405.2416 Email: Dutta@BusinessandElectionLaw.com Attorneys for Plaintiff MIKE HONDA FOR CONGRESS								
7									
8		UNITED STATE	ES DISTRICT COURT						
9		NORTHERN DISTRICT OF C	ALIFORNIA, SAN JOSE DIVISION						
10									
11	MIKE HO	NDA FOR CONGRESS,	CASE NO.						
12		Plaintiff,	JUDGE: TBD						
13	VS.		DECLARATION OF GARNETTA JOY ANNABLE IN SUPPORT OF						
14	BRIAN PA	ARVIZSHAHI, et al.	PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION						
15		Defendants.	Hearing Date: TBD						
16			11441.111.9 2 4444. 122						
17									
18	I, Garnetta J	oy Annable, declare as follows:							
19		MY BACK	GROUND						
20	1.	I am a resident of San Jose, Ca	lifornia.						
21	2.	Previously, I served as a Direct	or of the Santa Clara County Open Space						
22		Authority.							
23	3.	I am not a party in this action.	I make this Declaration of my own personal						
24		knowledge. If called as a witne	ess, I could and would testify competently to the						
25		truth of the matters set forth in	this Declaration.						
26		MY SUPPORT FOR CO	ONGRESSMEMBER HONDA						
27	4.	I am a supporter of Congressm	ember Mike Honda, and have made donations to						
28		Mike Honda for Congress. I ha	ave attached, as Exhibit 2, a true and accurate copy						
			ANNABLE DECLARATION						

of my donation records from the FEC's website (downloaded on Sept. 13, 2016 from http://www.fec.gov/finance/disclosure/norindsea.shtml).

RO KHANNA'S EMAIL SOLICITATION

- 5. On Saturday, Oct. 3, 2015, 3:14 pm, I received an email that was sent, via blind-carbon copy, to my personal email account. That email was sent by Mr. Khanna from his personal email account.
- 6. I have attached, as Exhibit 1, a true and correct copy of the email that I received from Mr. Khanna (the email addresses of myself and Mr. Khanna have been redacted).
- 7. In his email, Mr. Khanna asked if I "might have time for a call" to discuss his race against Congressmember Honda.
- 8. In that same email, Mr. Khanna further stated that "Honda's ethics scandal has convinced many voters about the need for change." Mr. Khanna's email also contained, under the heading of "Recent Press", links to a number of pieces that were critical of Congressmember Honda.

MY SURPRISE AT RECEIVING MR. KHANNA'S EMAIL SOLICITATION

- 9. I have never made a donation to Mr. Khanna or his campaign.
- 10. I was surprised to receive Mr. Khanna's email solicitation, for I had not had *any* previous contact whatsoever with Mr. Khanna or any of his campaigns.
- 11. Prior to receiving Mr. Khanna's email on Oct. 3, 2015, I had never contacted, spoken to, or otherwise reached out to Mr. Khanna or to any of his campaigns.
- 12. Prior to receiving Mr. Khanna's email on Oct. 3, 2015, I had never shared my personal email address with Mr. Khanna or any of his campaigns.

1 2 3	I declare under penalty of perjury that the foregoing is true and correct. Executed on Sept. 14, 2016.
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6	By: /s/ Garnetta Joy Annable
7	GARNETTA JOY ANNABLE
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	- 3 - ANNABLE DECLARATION

From: Ro Khanna < REDACTED>

Sent: Saturday, October 3, 2015 3:14 PM

Subject: Request for a call regarding CD 17 race post Honda ethics scandal

Dear Friend,

I respect your support for Democratic causes. As you may know, I am running for Congress from the heart of Silicon Valley against Mike Honda. I worked for President Obama as Deputy Assistant Secretary of Commerce and now teach economics at Stanford.

Last cycle, I secured 48.2 percent of the vote. This cycle we are poised to win with very favorable polling. Honda's ethics scandal has convinced many voters about the need for change.

I am passionate about articulating a progressive economic vision to deal with the challenges of automation and globalization.

It would be an honor to chat with you about the race and about my policy ideas.

Please let me know if you might have time for a call.

Thanks, Ro

Recent Press:

County Assessor Larry Stone Calls on Mike Honda to Retire (CBS Clip)

Major Endorsements and Momentum:

Ro Khanna endorsed over Mike Honda by three prominent San Jose Democrats San Jose Mercury News // Josh Richman // September 25, 2015

Honda's Ethics Scandal:

10 Biggest Takeaways from the Mike Honda Ethics Probe Report

"Some of Honda's staffers recognized in the moment that House rules were being broken. In a private chat between two staff members, one employee notes that Mark Nakamoto is making campaign calls in the district office. The note recognizes such activity is "so illegal."

Mike Honda Ethics Report Is Serious Business

"If Honda knew this was happening, his conduct was unethical and illegal. If he did not know -- if he was that out of touch with the office he's supposed to oversee -- then he should not be in public office."

Rep Honda Crosses the Line On Ethics

"Leader Pelosi vowed to drain the swamp and run an honest, open ethical Congress. It seems that Honda, for one, missed the memo"

Mike Honda is Pulled Into an Ethics Quagmire

"His answer -- an ethically confused office and campaign -- is him. And he's lost the moral authority to be elected to another term."

Case 5:16-cv-05416 Document 5-13 Filed 09/22/16 Page 3 of 5

No Easy Way Out For Mike Honda

"Of all the House members in the country, Honda is probably one of the most in danger of losing a seat to his own party," said Kyle Kondik, a congressional elections expert at the University of Virginia's Center for Politics."

<u>Ethics report: Rep. Mike Honda, staff appear to have violated federal law, House rules</u>
"The pattern of allegations represented the most serious charges leveled against a Bay Area House member in recent memory."

Link to the Official Report Office of Congressional Ethics

Individual Contributions Arranged By Type, Giver, Then Recipient

Contributions to All Other Political Committees Except Joint Fundraising Committees

Contributor	Name City	State	ZIP Code	Employer	Occupation	Committee Name	Transaction	Date Amount Image Number
ANNABLE, GARNETTA	CAMPBELL	CA	95008	SANTA CLARA COUNTY	ESTATE ADMINISTRATOR	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	05/28/2016	150.00 201607159020663938
					Tota	l Contributions:	150.00	

TRY A: NEW QUERY RETURN TO: FEC HOME PAGE

Generated Mon Sep 12 22:19:54 2016

Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (800) 424-9530 In Washington (202) 694-1100 For the hearing impaired, TTY (202) 219-3336 Send comments and suggestions about this site to: webmaster@fec.gov.

1 2 3 4 5 6	Gautam Dutta, Esq. (State Bar No. 199326) BUSINESS, ENERGY, AND ELECTION LAW, PC 5655 Silver Creek Valley Rd # 900 San Jose, CA 95138 Telephone: 415.236.2048; Fax: 213.405.2416 Email: Dutta@BusinessandElectionLaw.com Attorneys for Plaintiff MIKE HONDA FOR CONGRESS								
7 8		LINITED STATE	ES DISTRICT COURT						
9		NORTHERN DISTRICT OF C	ALIFORNIA, SAN JOSE DIVISION						
10									
11	MIKE HON	NDA FOR CONGRESS,	CASE NO.						
12		Plaintiff,	JUDGE: TBD						
13	VS.		DECLARATION OF JUDY BERTELSEN IN SUPPORT OF						
14	BRIAN PA	RVIZSHAHI, et al.	PLAINTIFF'S MOTION FO PRELIMINARY INJUNCTI						
15		Defendants.							
16	Hearing Date: TBD								
17									
18	I, Judy Berte	elsen, declare as follows:							
19		MY BACK	GROUND						
20	1.	By professional training, I am a	a physician, geriatrician, and professor of political						
21		science.							
22	2.	I was awarded bachelor's degree	ees in English and Political Science from the						
23		University of California-Berke	ley, a Ph.D. in political science from the University						
24		of Oregon, and an M.D. from E	Brown University.						
25	3.								
26	4.	I am not a party in this action.	I make this Declaration of my own personal						
27		knowledge. If called as a witne	ess, I could and would testify competently to the						
28		truth of the matters set forth in	this Declaration.						
			BERTELSEN DECLARATION						
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MY SUPPORT FOR CONGRESSMEMBER HONDA

 I am a supporter of Congressmember Mike Honda, and have made donations to Mike Honda for Congress.

RO KHANNA'S EMAIL SOLICITATION

- 6. On Saturday, Oct. 3, 2015, 3:17 pm, I received an email that was sent, via blind-carbon copy, to my personal email account. That email was sent by Mr. Khanna from his personal email account.
- 7. I have attached, as Exhibit 1, a true and correct copy of an email chain containing Mr. Khanna's email (the email addresses of Mr. Khanna and myself have been redacted), my response, and Mr. Khanna's subsequent reply.
- 8. In his email, Mr. Khanna asked if I "might have time for a call" to discuss his race against Congressmember Honda.
- 9. In that same email, Mr. Khanna further stated that "Honda's ethics scandal has convinced many voters about the need for change." Mr. Khanna's email also contained, under the heading of "Recent Press", links to a number of pieces that were critical of Congressmember Honda.
- 10. In response, I emailed Mr. Khanna 21 minutes later, at 3:38 pm. In that email, I told Mr. Khanna that I strongly support Mike Honda.
- 11. One hour later, Mr. Khanna emailed me a response. Among other things, Mr. Khanna stated: "I hope over the years I will be able to earn your trust."

MY SURPRISE AT RECEIVING MR. KHANNA'S EMAIL SOLICITATION

- 12. I have never made a donation to Mr. Khanna or his campaign.
- 13. I was surprised to receive Mr. Khanna's email solicitation, for I had not had *any* previous contact whatsoever with Mr. Khanna or his campaign. Indeed, I neither live nor work in Congressional District 17.
- 14. Prior to receiving Mr. Khanna's email on Oct. 3, 2015, I had never contacted, spoken to, or otherwise reached out to Mr. Khanna or to his campaign.

1	15. Prior to receiving Mr. Khanna's email on Oct. 3, 2015, I had never shared my
2	personal email address with Mr. Khanna or his campaign.
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5	I declare under penalty of perjury that the foregoing is true and correct. Executed on
6	Sept. 21, 2016.
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9	By: /s/ Judy Bertelsen
10	JUDY BERTELSEN
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From: Ro Khanna < REDACTED>

Subject: Re: Request for a call regarding CD 17 race post Honda ethics scandal

Date: October 3, 2015 at 4:34:44 PM PDT

To: Judy Bertelsen < REDACTED >

Ms. Bertelsen:

Thank you for taking the time to reply. If you look at my website you will find that I also support eliminating the cap on social security payroll taxes and making the tax more progressive. My father relied on social security to help pay the mortgage on my childhood home after after the financial crash. Strengthening social security and having the wealthy pay more to do so is a priority of mine. I believe I can help bring consensus around this issue.

I also believe in expanding Medicare for all. I was very disappointed in Lieberman's vote against this.

My inspiration from politics comes from my grandfather who spent four years in jail in Gandhi's independence movement. If elected I would be the first Indian Hindu in our country's history. The district I am running from has the largest Indian American population.

I respect your support of Mike Honda. I just honestly believe this district needs a new beginning. I hope over the years I will be able to earn your trust.

Thanks for taking the time to write.

With respect, Ro

On Oct 3, 2015, at 3:38 PM, Judy Bertelsen <REDACTED> wrote:

Dear Mr. Khanna,

I am a real Democrat—one who believes in Medicare for all, who wants Social Security strengthened by requiring that people contribute for all of their income, not just the first \$118,000 or so.

That's why I support Mike Honda.

If you want to run for Congress, please run in a district that currently has a Republican or a Blue Dog Democrat—don't attack one of the finest progressives.

Your focusing on trying to unseat Honda shows very poor judgment and very poor values, in my view.

Sincerely,

Judy Bertelsen

On Oct 3, 2015, at 3:17 PM, Ro Khanna < REDACTED > wrote:

Dear Friend,

I respect your support for Democratic causes. As you may know, I am running for Congress from the heart of Silicon Valley against Mike Honda. I worked for President Obama as Deputy Assistant Secretary of Commerce and now teach economics at Stanford.

Last cycle, I secured 48.2 percent of the vote. This cycle we are poised to win with very favorable polling. Honda's ethics scandal has convinced many voters about the need for change.

I am passionate about articulating a progressive economic vision to deal with the challenges of automation and globalization.

It would be an honor to chat with you about the race and about my policy ideas.

Please let me know if you might have time for a call.

Thanks, Ro

Recent Press:

County Assessor Larry Stone Calls on Mike Honda to Retire (CBS Clip)

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Ro Khanna endorsed over Mike Honda by three prominent San Jose Democrats San Jose Mercury News // Josh Richman // September 25, 2015

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"If Honda knew this was happening, his conduct was unethical and illegal. If he did not know -- if he was that out of touch with the office he's supposed to oversee -- then he should not be in public office."

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Ethics report: Rep. Mike Honda, staff appear to have violated federal law, House rules

"The pattern of allegations represented the most serious charges leveled against a Bay Area House member in recent memory."

Link to the Official Report

Office of Congressional Ethics

1 2 3 4 5	BUSINESS 5655 Silve San Jose, C Telephone: Email: <u>Du</u>	atta, Esq. (State Bar No. 199326) S, ENERGY, AND ELECTION I r Creek Valley Rd # 900 CA 95138 : 415.236.2048; Fax: 213.405.24 atta@BusinessandElectionLaw.com for Plaintiff NDA FOR CONGRESS	16			
6 7						
8		UNITED STAT	ES DISTRICT COURT			
9		NORTHERN DISTRICT OF C	CALIFORNIA, SAN JOSE DIVISION			
10						
11	MIKE HO	NDA FOR CONGRESS,	CASE NO.			
12		Plaintiff,	JUDGE: TBD			
13	VS.		DECLARATION OF KALYN FREE IN SUPPORT OF PLAINTIFF'S			
14	BRIAN PA	ARVIZSHAHI, et al.	MOTION FOR PRELIMINARY INJUNCTION			
15		Defendants.	Hearing Date: TBD			
16						
17	I, Kalyn Fre	ee, declare as follows:				
18		MY BACK	GROUND			
19	1.	I am the former District Attorn	ney of Pittsburg and Haskell Counties in			
20		Southeastern Oklahoma. In 19	998, I became the first woman and Native American			
21		ever to be elected to that positi	on.			
22	2.	At 23, I was the youngest attor	mey ever hired by the U.S. Department of Justice			
23		(DOJ). As Senior Counsel in t	the Indian Resources Section, I supervised			
24		environmental litigation through	ghout Oklahoma's Indian Country.			
25	3.	In 1995, I was the only DOJ at	torney to receive the Arthur S. Flemming Award for			
26		Outstanding Service to the fed	eral government.			
27	4.	In 2004, I was a Democratic ca	andidate for an open seat in Oklahoma's 2 nd			
28		Congressional District.				
			FREE DECLARATION			

5. I am not a party to this action. I make this Declaration of my own personal knowledge. If called as a witness, I could and would testify competently to the truth of the matters set forth in this Declaration.

MY FRIENDSHIP WITH CONGRESSMEMBER HONDA

- 6. I am a friend and supporter of Congressmember Mike Honda. Federal Election Commission records show that I made my first donation of over \$200 to Mike Honda for Congress in 2010.
- 7. In that regard, I have attached, as Exhibit 2, a true and correct copy of my FEC donation records (downloaded on Sept. 6, 2016 from the FEC's website at http://www.fec.gov/finance/disclosure/norindsea.shtml).
- 8. I believe that Congressmember Honda is the *only* federal candidate from California to whom I have ever made a financial donation.

RO KHANNA'S EMAIL SOLICITATION

- 9. On Saturday, Oct. 3, 2015, 5:17 pm CT (3:17 pm PT), I received an email that was sent, as a blind-carbon copy, to my personal email account. That email was sent by Mr. Khanna from his personal email account.
- 10. I have attached, as Exhibit 1, a true and correct copy of Mr. Khanna's email (the email addresses of Mr. Khanna and myself have been redacted).
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- 12. In that same email, Mr. Khanna further stated that "Honda's ethics scandal has convinced many voters about the need for change." Mr. Khanna's email also contained, under the heading of "Recent Press", links to a number of articles that were critical of Congressmember Honda.

MY SURPRISE AT RECEIVING MR. KHANNA'S EMAIL

13. I was surprised to receive Mr. Khanna's email, for I had not had *any* previous contact whatsoever with Mr. Khanna or any of his campaigns. I do not even live

1	or work in California, let alone California's 17 th Congressional District.
2	14. I have never made a donation to Mr. Khanna or any of his campaigns.
3	15. Prior to receiving Mr. Khanna's email on Oct. 3, 2015, I had never contacted,
4	spoken to, or otherwise reached out to Mr. Khanna or any of his campaigns.
5	16. I have never shared my personal email address with Mr. Khanna or any of his
6	campaigns.
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9	I declare under penalty of perjury that the foregoing is true and correct. Executed on
10	Sept. 21, 2016.
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13	By: /s/ Kalyn Free
14	KALYN FREE
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From: Ro Khanna < REDACTED>

Date: Saturday, October 3, 2015 at 5:17 PM

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Thanks, Ro

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Link to the Official Report

Office of Congressional Ethics

Individual Contributions Arranged By Type, Giver, Then Recipient

Contributions to All Other Political Committees Except Joint Fundraising Committees

Contributor Name	City	State	ZIP Code	Employer	Occupation		Transaction	Date Amount Ima	ge Number
FREE, KALYN	MCALESTER	ОК	74501	CANDIDATE		FREE, KALYN CHERIE VIA KALYN FREE FOR CONGRESS	12/31/2003	5.00	24990327350
FREE, KALYN	MCALESTER	ОК	74501	INDN LIST	FOUNDER AND PRESIDENT	HUNTER, PAUL DAVID VIA DR HUNTER FOR CONGRESS	06/27/2006	250.00	27940057547
FREE, KALYN	MCALESTER	ОК	74501	INFORMATION REUQESTED	INFORMATION REQUESTED	PRESLEY, PATRICIA LEA VIA PRESLEY FOR CONGRESS	12/09/2005	250.00	26960186190
FREE, KALYN	MCALESTER	ОК	74501	SELF	ATTORNEY	DODD, DOUG VIA DOUG DODD FOR CONGRESS COMMITTEE	08/30/2004	250.00	24962460240
FREE, KALYN	MCALESTER	ОК	74501	STATE OF OK/DISTRICT ATTORNEY		HERSETH SANDLIN. STEPHANIE M VIA STEPHANIE HERSETH SANDLIN FOR SOUTH DAKOTA	10/31/2002	250.00	23990376714
FREE, KALYN	TULSA	ОК	74103	INDN	REQUESTED	SUTTON, BETTY S VIA BETTY SUTTON FOR CONGRESS	03/31/2006	250.00	10930306458
FREE, KALYN	TULSA	ОК	74103	INDN	REQUESTED	SUTTON, BETTY S VIA BETTY SUTTON FOR CONGRESS	06/27/2006	200.00	10990260063
FREE, KALYN	TULSA	ок	74103	SELF	ATTORNEY	DNC SERVICES CORP./DEM. NAT'L COMMITTEE	05/22/2007	500.00	27990161165
FREE, KALYN	TULSA	ОК	74103	SELF EMPLOYED	ATTORNEY	SENATE	09/25/2007	250.00	27020354262
FREE, KALYN	TULSA	ОК	74103	SELF EMPLOYED	ATTORNEY	VIA NOVICK FOR SENATE	03/30/2008	550.00	28020192988
FREE, KALYN	TULSA	ОК	74103		INFORMATION REQUESTED	OKLAHOMA DEMOCRATIC PARTY	10/29/2009	1000.00	10930270660
FREE, KALYN	TULSA	ОК	74105	SELF	ATTORNEY	VIA DEREK PAC	01/05/2012	250.00	12952557890
FREE, KALYN	TULSA	ОК	74105	SELF	ATTORNEY	FREE, KALYN CHERIE VIA KALYN FREE FOR CONGRESS	10/03/2008	2456.35	29932121771
FREE, KALYN	TULSA	ОК	74105	SELF	ATTORNEY	WILSON, JIM VIA JIM WILSON FOR CONGRESS	06/03/2010	2000.00	10930959959
FREE, KALYN	TULSA	ОК	74105	SELF EMPLOYED	ATTORNEY	OBAMA, BARACK / JOSEPH R. BIDEN VIA OBAMA FOR AMERICA	10/16/2008	300.00	11953143839
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HALTER, WILLIAM A VIA BILL HALTER FOR SENATE	03/01/2010	250.00	10020282469
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HEITKAMP, HEIDI VIA HEIDI FOR SENATE	08/26/2014	300.00	15020051506
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	03/22/2010	500.00	10990535774
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	06/07/2010	1500.00	10930992639

FEC Individual Contribution Search Results

			FEC In	ndividual Contr	ibution Search	n Results			
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	04/08/2013	250.00	14970892006
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	10/14/2013	496.75	14960344817
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	12/21/2013	200.00	14960344786
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	02/25/2014	1000.00	14941215336
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	05/04/2014	250.00	14941783516
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	06/10/2014	250.00	14950010872
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	VIA MIKE HONDA FOR CONGRESS	06/27/2014	250.00	14950010854
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	VIA MIKE HONDA FOR CONGRESS	07/16/2014	250.00	14978278546
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	10/22/2014	200.00	15950601300
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	VIA MIKE HONDA FOR CONGRESS	10/27/2014	200.00	15950601355
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	09/23/2015	500.00	201604149012408719
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	11/17/2015	200.00	201607149020475228
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	VIA MIKE HONDA FOR CONGRESS	01/07/2016	200.00	201607149020475499
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	VIA MIKE HONDA FOR CONGRESS	02/25/2016	673.24	201607149020475437
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	02/26/2016	989.28	201607149020475423
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	06/09/2016	500.00	201607159020664054
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	HONDA, MIKE VIA MIKE HONDA FOR CONGRESS	06/29/2016	200.00	201607159020664022
FREE, KALYN	TULSA	ОК	74105		INFORMATION REQUESTED	OKLAHOMA DEMOCRATIC PARTY	07/06/2010	500.00	10930991319
FREE, KALYN	TULSA	OK	74105			VIA DEREK PAC DNC SERVICES	06/20/2012	-250.00	<u>12971717055</u>
FREE, KALYN	TULSA	OK	74105	SELF	ATTORNEY	CORP./DEM. NAT'L COMMITTEE JUNEAU, DENISE	11/16/2015	500.00	201601119004464495
FREE, KALYN	TULSA	ОК	74105	SELF	ATTORNEY	VIA DENISE JUNEAU FOR CONGRESS	01/08/2016	100.00	201604139012323377
FREE, KALYN	TULSA	ОК	74105	SELF	ATTORNEY	JUNEAU, DENISE VIA DENISE JUNEAU FOR CONGRESS	02/08/2016	100.00	201604139012323377
FREE, KALYN	TULSA	ОК	74105	SELF	ATTORNEY	JUNEAU, DENISE VIA DENISE JUNEAU FOR CONGRESS	06/23/2016	200.00	201607159020550605
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	CLINTON. HILLARY RODHAM / KAINE, TIMOT VIA HILLARY FOR AMERICA	11/16/2015	1000.00	201607059020159880
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	CLINTON, HILLARY RODHAM / KAINE, TIMOT VIA HILLARY FOR AMERICA	12/02/2015	1300.00	201607059020147999
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	CLINTON, HILLARY RODHAM / KAINE, TIMOT VIA HILLARY FOR AMERICA	06/08/2016	50.00	201607319022133232
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	CLINTON, HILLARY RODHAM / KAINE, TIMOT VIA HILLARY FOR AMERICA	06/20/2016	100.00	201607319022094462

Case 5:16-cv-05416 Document 5-11 Filed 09/22/16 Page 7 of 8 FEC Individual Contribution Search Results

				FEC II	idividuai Contr	ribution Search	n Results			
	FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	UDALL TOM VIA UDALL FOR US ALL	05/08/2013	500.00	14020382668
	FREE, KALYN C	TULSA	ок	74103	SELF	ATTORNEY	RICE, ANDREW MONROE VIA ANDREW RICE FOR US SENATE INC	09/07/2007	250.00	27020352932
	FREE, KALYN C	TULSA	ОК	74103	SELF	ATTORNEY	RICE, ANDREW MONROE VIA ANDREW RICE FOR US SENATE INC	09/22/2008	250.00	28020502697
	FREE, KALYN C MS.	MCALESTER	ОК	74501	SELF	ATTORNEY	EMILY'S LIST	08/23/2004	1000.00	25990952039
	FREE, KALYN C MS.	MCALESTER	ОК	74501	SELF	ATTORNEY	EMILY'S LIST	02/06/2005	1300.00	26980016505
	FREE, KALYN C MS.	TULSA	ОК	74103	SELF	ATTORNEY	EMILY'S LIST	03/20/2006	250.00	26960168994
	FREE, KALYN C MS.	TULSA	ОК	74103	SELF	ATTORNEY	EMILY'S LIST	08/15/2006	200.00	26960372718
	FREE, KALYN CHERIE	MCALESTER	ОК	74502	ATTY		NATIONAL UNITY CAUCUS	10/18/1998	200.00	98034111682
	FREE, KALYN CHERIE	TULSA	ОК	74105	SELF	ATTORNEY	OKLAHOMA DEMOCRATIC PARTY	05/06/2013	500.00	13963155829
	FREE, KALYN CHERIE	TULSA	ОК	74105	SELF	ATTORNEY	OKLAHOMA DEMOCRATIC PARTY	08/06/2013	500.00	13941638676
	FREE, KALYN CHERIE	TULSA	ОК	74105	SELF	ATTORNEY	WALLACE, ROB VIA ROB WALLACE FOR CONGRESS 2012	03/01/2012	250.00	12954301108
	FREE, KALYN CHERIE	TULSA	ОК	74105	SELF	ATTORNEY	WALLACE, ROB VIA ROB WALLACE FOR CONGRESS 2012	04/19/2012	500.00	12972489257
	FREE, KALYN CHERIE	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	OKLAHOMA DEMOCRATIC PARTY	08/07/2012	333.33	201511059003288024
	FREE, KALYN CHERIE	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	OKLAHOMA DEMOCRATIC PARTY	07/17/2015	100.00	201508209000923158
	FREE, KALYN CHERIE	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	OKLAHOMA DEMOCRATIC PARTY	08/17/2015	100.00	201509209002760170
	FREE, KALYN CHERIE	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	OKLAHOMA DEMOCRATIC PARTY	09/17/2015	100.00	201510209003169046
	FREE, KALYN CHERIE	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	OKLAHOMA DEMOCRATIC PARTY	10/17/2015	100.00	201511209003423727
	FREE, KALYN CHERIE	TULSA	ок	74105	SELF- EMPLOYED	ATTORNEY	OKLAHOMA DEMOCRATIC PARTY	11/17/2015	100.00	201512189004353948
	FREE, KALYN CHERIE	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	OKLAHOMA DEMOCRATIC PARTY	12/17/2015	100.00	201601299004782900
	FREE, KALYN CHERIE	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	OKLAHOMA DEMOCRATIC PARTY	03/17/2016	100.00	201604209014591815
	FREE, KALYN CHERIE	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	OKLAHOMA DEMOCRATIC PARTY	03/30/2016	115.00	201604209014591816
	FREE, KALYN CHERIE	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	OKLAHOMA DEMOCRATIC PARTY	04/17/2016	100.00	201605209015991581
	FREE, KALYN MS	MCALESTER	ОК	74502	SELF		ROBERTS. WALTER LENN VIA WALT ROBERTS FOR CONGRESS	10/05/1998	500.00	98990028100
	FREE, KALYN MS	MCALESTER	OK	74502	SELF		ROBERTS, WALTER LENN VIA WALT ROBERTS FOR CONGRESS	10/05/1998	1000.00	98990028100
	FREE, KALYN MS	MCALESTER	ОК	74502	SELF		ROBERTS, WALTER LENN VIA WALT ROBERTS FOR CONGRESS	10/05/1998	1000.00	98990028100
-	FREE, KALYN MS	MCALESTER	ОК	74502	SELF	DICTRICT	ROBERTS, WALTER LENN VIA WALT ROBERTS FOR CONGRESS	10/17/1998	200.00	98990030704
* Constitution of the Cons	FREE, KALYN MS.	MCALESTER		74501	STATE OF OK	DISTRICT	EMILY'S LIST	03/25/2003	1000.00	23992424869
***************************************	FREE, KALYN MS. FREE, KALYN MS.	TULSA	ок ок	74105 74105	SELF SELF	ATTORNEY ATTORNEY	EMILY'S LIST EMILY'S LIST	03/31/2010 04/30/2010	1500.00 1000.00	10990806267 10930720102
-	, AMELIA MOI	. 0.00	-11			OKNET	milkhilmi hekbil	- 1/ 30/ 2010	1000.00	44444144444

FEC Individual Contribution Search Results

FREE, KALYN MS. TULSA OK 74105 SELF-EMPLOYED ATTORNEY EMILY'S LIST 06/14/2016 35.00 2016071990220694580

Total Contributions: 34703.95

Joint Fundraising Contributions

These are contributions to committees who are raising funds to be distributed to other committees. The breakdown of these contributions to their final recipients may appear below

Contributor Name	City	State	ZXP Code	Employer	Occupation	Committee Name	Transaction	Date Amount	Image Number
FREE, KALYN	MCALESTER	ОК	74501	STATE OF OK/DISTRICT ATTORNEY		AMERICA WOMEN VOTEL 2002	08/30/2002	500.00	22992004531
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	OBAMA VICTORY FUND 2012	06/04/2012	500.00	13962731027
FREE, KALYN	TULSA	ОК	74105	SELF- EMPLOYED	ATTORNEY	OBAMA VICTORY FUND 2012	06/16/2012	200.00	13962732573
					Total Joi	int Fundraising:	1200.00		

Recipient of Joint Fundraiser Contributions

These are the Final Recipients of Joint Fundralsing Contributions

Contributor Name	City	State	ZIP Code	Employer	Occupation	Committee Name	Transaction D	ate Amount	Image Numbe
FREE, KALYN	TULSA	ок	74105	SELF- EMPLOYED	ATTORNEY	OBAMA, BARACK / JOSEPH R. BIDEN VIA OBAMA FOR AMERICA	06/04/2012	500.00	13943248562
FREE, KALYN	TULSA	ок	74105	SELF- EMPLOYED	ATTORNEY	OBAMA, BARACK / JOSEPH R. BIDEN VIA OBAMA FOR AMERICA	06/16/2012	200.00	13943257356
					F	Recipient Total:	700.00		

TRY A: NEW QUERY RETURN TO: FEC HOME PAGE

Generated Tue Sep 6 20:43:59 2016

Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (800) 424-9530 In Washington (202) 694-1100 For the hearing impaired, TTY (202) 219-3336 Send comments and suggestions about this site to: webmaster@fcc.gov.

1 2 3 4 5 6 7	BUSINESS 5655 Silver San Jose, C Telephone: Email: <u>Dut</u>	415.236.2048; Fax: 213.405.24 tta@BusinessandElectionLaw.co	-16	
8		UNITED STAT	ES DISTRICT COURT	
9		NORTHERN DISTRICT OF C	CALIFORNIA, SAN JOSE DIVISION	
10				
11	MIKE HO	NDA FOR CONGRESS,	CASE NO.	
12		Plaintiff,	JUDGE: TBD	
13	VS.		DECLARATION OF FAYZAN GOWANI IN SUPPORT OF	
14	BRIAN PARVIZSHAHI, et al. PLAINTIFF'S MOTION FO PRELIMINARY INJUNCTION			
15		Defendants.	Hearing Date: TBD	
16 17 18 19 20 21 22 23 24 25 26 27 28	I, Fayzan Go 1. 2.	knowledge. If called as a with truth of the matters set forth in On Oct. 3, 2015, I received an email account. I have attached, as Exhibit 1, a	email that was sent by Ro Khanna to my personal true and correct copy of an email chain containing addresses of Mr. Khanna and myself have been	
			GOWANI DECLARATION	

1 2 3 4	I declare under penalty of perjury that the foregoing is true and correct. Executed on Sept. 15, 2016.
5	By: /s/ Fayzan Gowani
6	FAYZAN GOWANI
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	GOWANI DECLARATION

EXHIBIT 1

From: **Ro Khanna** < REDACTED > Date: Sunday, October 4, 2015

Subject: Request for a call regarding CD 17 race post Honda ethics scandal

To: Fayzan Gowani <REDACTED>
Cc: Brian Parvizshahi <REDACTED>

You were on a friends list as a prospect of someone who would find my campaign platform attractive as a next generation democrat. Most we contacted have been supportive. I am sorry you were included on this list and we will take you off per your request.

Brian, please make sure of that.

Thanks and sorry for the inconvenience.

Best, Ro

Sent from my iPhone

On Oct 4, 2015, at 12:17 AM, Fayzan Gowani <REDACTED> wrote:

Also, please explain *how* you found my email. I have never and do not plan on voting or campaigning for you, nor have I ever resided in your district. Thanks.

On Sunday, October 4, 2015, Fayzan Gowani <REDACTED> wrote: Her. Thank you.

On Sunday, October 4, 2015, Ro Khanna <REDACTED> wrote: Please take him off the list. Thanks

Sent from my iPhone

On Oct 3, 2015, at 8:34 PM, Fayzan Gowani <REDACTED> wrote:

Please take me off of this list forever.

On Saturday, October 3, 2015, Ro Khanna <REDACTED> wrote: Dear Friend,

I respect your support for Democratic causes. As you may know, I am running for Congress from the heart of Silicon Valley against Mike Honda. I worked for President Obama as Deputy Assistant Secretary of Commerce and now teach economics at Stanford.

Last cycle, I secured 48.2 percent of the vote. This cycle we are poised to win with very favorable polling. Honda's ethics scandal has convinced many voters about the need for change.

I am passionate about articulating a progressive economic vision to deal with the challenges of

automation and globalization.

It would be an honor to chat with you about the race and about my policy ideas.

Please let me know if you might have time for a call.

Thanks, Ro

Recent Press:

County Assessor Larry Stone Calls on Mike Honda to Retire (CBS Clip)

Major Endorsements and Momentum:

Ro Khanna endorsed over Mike Honda by three prominent San Jose Democrats San Jose Mercury News // Josh Richman // September 25, 2015

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10 Biggest Takeaways from the Mike Honda Ethics Probe Report

"Some of Honda's staffers recognized in the moment that House rules were being broken. In a private chat between two staff members, one employee notes that Mark Nakamoto is making campaign calls in the district office. The note recognizes such activity is "so illegal."

Mike Honda Ethics Report Is Serious Business

"If Honda knew this was happening, his conduct was unethical and illegal. If he did not know -- if he was that out of touch with the office he's supposed to oversee -- then he should not be in public office."

Rep Honda Crosses the Line On Ethics

"Leader Pelosi vowed to drain the swamp and run an honest, open ethical Congress. It seems that Honda, for one, missed the memo"

Mike Honda is Pulled Into an Ethics Quagmire

"His answer -- an ethically confused office and campaign -- is him. And he's lost the moral authority to be elected to another term."

No Easy Way Out For Mike Honda

"Of all the House members in the country, Honda is probably one of the most in danger of losing a seat to his own party," said Kyle Kondik, a congressional elections expert at the University of Virginia's Center for Politics."

Ethics report: Rep. Mike Honda, staff appear to have violated federal law, House rules "The pattern of allegations represented the most serious charges leveled against a Bay Area House member in recent memory."

Link to the Official Report

Office of Congressional Ethics		
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1 2 3 4 5 6	Gautam Dutta, Esq. (State Bar M BUSINESS, ENERGY, AND E 5655 Silver Creek Valley Rd # 9 San Jose, CA 95138 Telephone: 415.236.2048; Fax: Email: <u>Dutta@BusinessandElect</u> Attorneys for Plaintiff MIKE HONDA FOR CONGRE	ELECTION LAV 900 : 213.405.2416 ctionLaw.com				
7						
8	UNITED STATES DISTRICT COURT					
9	NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION					
10						
11	MIKE HONDA FOR CONGRE	ESS,	CASE NO.			
12	Plaintiff,		JUDGE: TBD			
13	HASEGAWA IN					
14	BRIAN PARVIZSHAHI, et al. PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION					
15	Defendants.		Hearing Date: TBD			
16			Truming Bure. 135			
17						
18	I, Robert "Bob" Hasegawa, declare as follows:					
19		MY BACKGE	ROUND			
20	1. I have served in the	ne Washington S	State Legislature since 2005. Currently, I am a			
21	Member of the Wa	ashington State	Senate. Previously, I served in the Washington			
22	State House of Re	presentatives.				
23	2. I am not a party in	this action. In	make this Declaration of my own personal			
24	knowledge. If called as a witness, I could and would testify competently to the					
25	truth of the matter	s set forth in thi	is Declaration.			
26	MY FRIENDS	SHIP WITH CO	ONGRESSMEMBER HONDA			
27	3. I am a personal fri	iend of Congres	smember Mike Honda.			
28	4. I donated \$300 to	Mike Honda fo	r Congress on Mar. 23, 2014.			
			HASEGAWA DECLARATION			

- 5. Congressmember Honda is the *only* federal candidate to whom I have ever made a financial donation exceeding \$200.
- 6. I understand that federal candidates are required to file FEC reports that identify the names and mailing addresses of donors who make donations exceeding \$200 during an election cycle.
- 7. In that regard, I have attached, as Exhibit 1, a true and correct copy of my federal-candidate donation records from the Federal Election Commission (FEC). Those records were downloaded on Aug. 30, 2016 from the FEC's website (*available at* http://docquery.fec.gov/cgi-bin/qind/).
- 8. Those FEC records which do *not* list my personal email address indicate that I donated \$300 to Mike Honda for Congress on Mar. 23, 2014.

RO KHANNA'S EMAIL SOLICITATION

- 9. On Saturday, Oct. 3, 2015, 3:10 pm, I received an email that was sent to my personal (i.e., non-Washington State) email account. That email was sent, via blind-carbon copy, by Mr. Khanna from his personal email account.
- 10. I have attached, as Exhibit 2, a true and correct copy of Mr. Khanna's email (the email addresses of Mr. Khanna and myself have been redacted).
- 11. In his email, Mr. Khanna asked if I "might have time for a call" to discuss his race against Congressmember Honda.
- 12. In that same email, Mr. Khanna further stated that "Honda's ethics scandal has convinced many voters about the need for change." Mr. Khanna's email also contained, under the heading of "Recent Press", links to a number of articles that were critical of Congressmember Honda.

MY SURPRISE AND DISAPPOINTMENT AT RECEIVING MR. KHANNA'S EMAIL

13. I was surprised to receive Mr. Khanna's email, for I had not had *any* previous contact whatsoever with Mr. Khanna or any of his campaigns. I do not even live or work in California, let alone California's 17th Congressional District.

	Case 5:16-cv-05416	Document 5-4	Filed 09/22/16	Page 3 of 3
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1	14.	I have never made a donation to any of Mr. Khanna's campaigns.
2	15.	Prior to receiving Mr. Khanna's email on Oct. 3, 2015, I had never contacted,
3		spoken to, or otherwise reached out to Mr. Khanna or to any of his campaigns.
4	16.	I have never shared either my personal (i.e., non-Washington State) email address
5		or official email address with Mr. Khanna or any of his campaigns.
6	17.	As a longtime public servant, I was disappointed by Mr. Khanna's conduct as a
7		candidate for public office. Even though we had never met, spoken, or
8		corresponded before, Mr. Khanna deliberately chose to solicit me to stop
9		supporting – and turn against – a personal friend.
10		
11		
12 13	I decla	are under penalty of perjury that the foregoing is true and correct. Executed on
14	Sept. 8, 2016.	
15		
16		
17		By: /s/ Robert "Bob" Hasegawa
18		ROBERT "BOB" HASEGAWA
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27		
28		

EXHIBIT 1

FEC Individual Contribution Search Results

Individual Contributions Arranged By Type, Giver, Then Recipient

Contributions to All Other Political Committees Except Joint Fundraising Committees

TRY A: NEW QUERY RETURN TO: FEC HOME PAGE

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Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (800) 424-9530 In Washington (202) 694-1100 For the hearing impaired, TTY (202) 219-3336 Send comments and suggestions about this site to: webmaster@fec.gov.

EXHIBIT 2

From: Ro Khanna < REDACTED>

Subject: Request for a call regarding CD 17 race post Honda ethics scandal

Date: October 3, 2015 at 3:10:06 PM PDT

To: undisclosed-recipients:;

Dear Friend.

I respect your support for Democratic causes. As you may know, I am running for Congress from the heart of Silicon Valley against Mike Honda. I worked for President Obama as Deputy Assistant Secretary of Commerce and now teach economics at Stanford.

Last cycle, I secured 48.2 percent of the vote. This cycle we are poised to win with very favorable polling. Honda's ethics scandal has convinced many voters about the need for change.

I am passionate about articulating a progressive economic vision to deal with the challenges of automation and globalization.

It would be an honor to chat with you about the race and about my policy ideas.

Please let me know if you might have time for a call.

Thanks, Ro

Recent Press:

County Assessor Larry Stone Calls on Mike Honda to Retire (CBS Clip)

Major Endorsements and Momentum:

Ro Khanna endorsed over Mike Honda by three prominent San Jose Democrats San Jose Mercury News // Josh Richman // September 25, 2015

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"Of all the House members in the country, Honda is probably one of the most in danger of losing a seat to his own party," said Kyle Kondik, a congressional elections expert at the University of Virginia's Center for Politics."

Ethics report: Rep. Mike Honda, staff appear to have violated federal law, House rules
"The pattern of allegations represented the most serious charges leveled against a Bay Area House member in recent memory."

Link to the Official Report

Office of Congressional Ethics

Case 5:16-cv-05416 Document 5-8 Filed 09/22/16 Page 1 of 3

1 2 3 4 5 6	Gautam Dutta, Esq. (State Bar No. 199326) BUSINESS, ENERGY, AND ELECTION LAW, PC 5655 Silver Creek Valley Rd # 900 San Jose, CA 95138 Telephone: 415.236.2048; Fax: 213.405.2416 Email: Dutta@BusinessandElectionLaw.com Attorneys for Plaintiff MIKE HONDA FOR CONGRESS					
7						
8		UNITED STATE	ES DISTRICT COURT			
9		NORTHERN DISTRICT OF C	ALIFORNIA, SAN JOSE DIVISION			
10						
11	MIKE HON	NDA FOR CONGRESS,	CASE NO.			
12		Plaintiff,	JUDGE: TBD			
13	VS.		DECLARATION OF DALE MINAMI IN SUPPORT OF PLAINTIFF'S			
14	BRIAN PARVIZSHAHI, et al. MOTION FOR PRELIMINARY INJUNCTION					
15		Defendants.	Hearing Date: TBD			
16			•			
17	15116					
18	I, Dale Mina	mi, declare as follows:	CD OV DVD			
19		MY BACK				
20	1.	I am an attorney who has practiced law since 1972.				
21	2.	A resident of San Francisco, I live and work outside of Congressional District 17.				
22	3.	My practice focuses on the areas of personal injury and wrongful death. I also				
23		represent clients in the entertainment industry, including Olympic Gold Medalist				
24		Kristi Yamaguchi and a number of television journalists.				
25	4.	I am co-founder of the Asian Law Caucus, the first community interest law firm				
26		serving Asian Americans and F	serving Asian Americans and Pacific Islanders in the country; co-founder of the			
27		Asian American Bar Association	on of the Greater Bay Area, the first Asian			
28		American bar association in the	e country; and co-founder of the Coalition of Asian			
			MINAMI DECLARATION			

- Pacific Americans, one of the nation's first political action committees focused on Asian American candidates and issues.
- 5. I have also served as a Commissioner on the State Bar's Commission on Judicial Nominees Evaluation and on Senator Barbara Boxer's Judicial Screening Committee (which makes recommendations for federal judicial appointments).
- 6. I am not a party in this action. I make this Declaration of my own personal knowledge. If called as a witness, I could and would testify competently to the truth of the matters set forth in this Declaration.

MY SUPPORT FOR CONGRESSMEMBER HONDA

7. I am a longtime friend and supporter of Congressmember Mike Honda, and have made donations to Mike Honda for Congress.

RO KHANNA'S EMAIL SOLICITATION

- 8. On Saturday, Oct. 3, 2015, 3:15 pm, I received an email that was sent, as a blind-carbon copy, to my office email address. That email was sent by Mr. Khanna from his personal email account.
- 9. I have attached, as Exhibit 1, a true and correct copy of Mr. Khanna's email (the email addresses of Mr. Khanna and myself have been redacted).
- 10. In his email, Mr. Khanna asked if I "might have time for a call" to discuss his race against Congressmember Honda.
- 11. In that same email, Mr. Khanna further stated that "Honda's ethics scandal has convinced many voters about the need for change." Mr. Khanna's email also contained, under the heading of "Recent Press", links to a number of pieces that were critical of Congressmember Honda.

MY SURPRISE AT RECEIVING MR. KHANNA'S EMAIL SOLICITATION

12. I was surprised to receive Mr. Khanna's email solicitation. I have no friendship or personal relationship with him, and I neither live nor work in Congressional District 17.

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S

- 13. Around 2007, I met Mr. Khanna in passing at a scholarship event. Prior to receiving Mr. Khanna's email, I had not met, spoken with, corresponded with, or otherwise reached out to him and have not had any other contact with him to my recollection during any of his campaigns since that one encounter in 2004.
- 14. I have never made any donation to any of Ro Khanna's campaigns to my recollection. I do not recall ever sharing either my office or personal email address with Mr. Khanna or any of his campaigns.

I declare under penalty of perjury that the foregoing is true and correct. Executed on Sept. 21, 2016.

By: /s/ Dale Minami

DALE MINAMI

EXHIBIT 1

Case 5:16-cv-05416 Document 5-9 Filed 09/22/16 Page 2 of 3

From: Ro Khanna [mail to: REDACTED]
Sent: Saturday, October 03, 2015 3:15 PM

Subject: Request for a call regarding CD 17 race post Honda ethics scandal

Dear Friend.

I respect your support for Democratic causes. As you may know, I am running for Congress from the heart of Silicon Valley against Mike Honda. I worked for President Obama as Deputy Assistant Secretary of Commerce and now teach economics at Stanford.

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Thanks, Ro

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No Easy Way Out For Mike Honda

Case 5:16-cv-05416 Document 5-9 Filed 09/22/16 Page 3 of 3

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<u>Ethics report: Rep. Mike Honda, staff appear to have violated federal law, House rules</u>
"The pattern of allegations represented the most serious charges leveled against a Bay Area House member in recent memory."

Link to the Official Report
Office of Congressional Ethics

1 2 3 4 5 6	GAUTAM DUTTA (State Bar No. 199326) BUSINESS, ENERGY, AND ELECTION I 5655 Silver Creek Valley Rd # 900 San Jose, CA 95138 Telephone: 415.236.2048 Email: Dutta@BusinessandElectionLaw.co Fax: 213.405.2416 Attorneys for Plaintiff HONDA FOR CONGRESS	LAW, PC
7 8	IINITED STAT	ES DISTRICT COURT
9		TRICT OF CALIFORNIA
10		OSE DIVISION
11	SAIV	JOE DIVISION
12	MIKE HONDA FOR CONGRESS,	CASE NO.
13	Plaintiff,	JUDGE: TBD
14	vs.	V 0 2 0 2. 1 2 2
15	BRIAN PARVIZSHAHI, et al.	PLAINTIFF MIKE HONDA FOR
16	,	CONGRESS' REQUEST FOR JUDICIAL NOTICE
17	Defendants.	
18		HEARING DATE: TBD
19		
20		
21	<u>POINTS AN</u>	ND AUTHORITIES
22	I. Documents for Which Judicial Noti	ice Is Requested
23	Plaintiff Mike Honda for Congress re-	spectfully asks the Court to take judicial notice of
24	the following documents:	
25	1. Salary information for Brian Parvizsh	ahi in Federal Election Commission Campaign
26	Finance Disclosure Portal's report of	Rohit Khanna's Candidate Operating Expenditures
27	(hereinafter, the "Parvizshahi Salary I	Records", attached as Exhibit 1 to the accompanying
28	Declaration of Robert Eberhardt) (dov	wnloaded from www.fec.gov).
2 0		REQUEST FOR JUDICIAL NOTICE

- 2. Contribution record of Garnetta Annable from Federal Election Commission's website, attached as Exhibit 2 to the accompanying Declaration of Garnetta Annable (downloaded on September 13, 2016 from http://www.fec.gov/finance/dislcosure/norindsea.shtml)
- 3. LinkedIn profile of Brian Parvizshahi, *attached as* Exhibit 2 to the accompanying Declaration of Michael Beckendorf (downloaded from http://www.linkedin.com/in/brianparvi (last visited Sept. 17, 2016).

II. Relevance of Proffered Documents

The Parvizshahi Salary Records are relevant to this litigation, for they show that Defendant Brian Parvizshahi was employed by Defendant Ro for Congress, Inc. when he repeatedly accessed Mike Honda for Congress' confidential, proprietary data.

The contribution records of Garnetta Annable are relevant to this litigation, for they show that the Federal Election Commission had no record of any federal campaign contribution from Ms. Annable until May 28, 2016.

Brian Parvizshahi's LinkedIn profile is relevant, for it shows that Mr. Parvizshahi (1) was already employed by Defendant Ro for Congress, Inc. when he repeatedly accessed Mike Honda for Congress' confidential, proprietary data, (2) was working as Ro for Congress, Inc.'s Data Director when he repeatedly accessed Mike Honda for Congress' confidential, proprietary data, and (3) was promoted to Campaign Manager and was working as Campaign Manager for Ro for Congress, Inc. when he repeatedly accessed Mike Honda for Congress' confidential, proprietary data.

III. The Court May Take Judicial Notice under FRE 201

A court must take judicial notice if requested by a party and supplied with the necessary information. Federal Rule of Evidence §201(b); *see also U.S. v. Ritchie*, 342 F.3d 903, 909 (9th Cir. 2003). Courts regularly takes judicial notice of facts from court documents. "[T]he most frequent use of judicial notice of ascertainable facts is in noticing the content of *court records*." *Colonial Penn Ins. Co. v. Coil*, 887 F.2d 1236, 1239 (4th Cir. 1989) (italics added).

Accordingly, the Ninth Circuit has held that it "may take notice of proceedings in other

1 2 3 4 5 6 7	burts, both within and without the federal judicial system, if those proceedings have a direct elation to matters at issue." <i>U.S. ex rel. Robinson Rancheria Citizens Council v. Borneo, Inc.</i> , 71 F.2d 244, 248 (9th Cir. 1992) (citations and internal quotations omitted). Here, the Parvizshahi Salary Records, contribution records of Garnetta Annable, and inkedIn profile of Brian Parvizshahi are relevant to this action. Accordingly, the Court may take edicial notice of the aforementioned documents.	
8 9	DATED: Sept. 22, 2016	BUSINESS, ENERGY, AND ELECTION LAW, PC
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11		By: /s/ GAUTAM DUTTA, ESQ.
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