

PART I

6a. Please note that Sai is mononymic; that is his full legal name.

10. MYL C3 has total receipts <\$50,000/year since inception, and therefore qualifies for 990-N filing. MYL C3 will file a 990 or 990-EZ when and if receipts are >\$50,000/year.

PART II

1. Filestamped Delaware certificate of incorporation attached.

5. Current bylaws attached. Bylaws were adopted on August 5, 2012.

PART IV

The Make Your Laws group, overall

The Make Your Laws group (collectively, "MYL group") consists of three corporations (MYL C3, MYL C4, and MYL PAC, detailed below; individually, "MYL entities"):

1. Make Your Laws, Inc. ("MYL C3") - EIN 61-1686259, 501(c)3
2. Make Your Laws Advocacy, Inc. ("MYL C4") - EIN 46-0587765, 501(c)4
3. Make Your Laws PAC, Inc. ("MYL PAC") - EIN 46-0580579, FEC C00529743, 527 hybrid Super PAC

The MYL group is associated¹ by complete overlap of directors, officers, and overall goals. Each corporation was independently organized by the incorporators out of their own money, and no corporation is a member or controller of another. The corporations' bylaws and certificates of incorporation are nearly identical, except for the formalities associated with different legal requirements on each².

Overall, the MYL group's objectives are the promotion of direct democracy and voter empowerment, including a particular variant of direct democracy called liquid democracy.³ This leads us to two broad classes of activity:

1. Activities that specifically further the MYL group's own overall objectives, such as promoting better public records access, legality of digital signatures, voter initiative power, third party viability, better two-way communication between citizens and their elected representatives, unrestricted widespread Internet access, etc.

¹ In accordance with IRS' guidance at <http://www.irs.gov/pub/irs-tege/eotopics00.pdf> regarding permissible c3/c4/527 triads

² both from IRS and FEC — e.g. MYL C3's bylaws and certificate of incorporation prohibit it from spending any significant money on political or lobbying activity, using language essentially copied from the IRS' recommended templates; MYL PAC's bylaws contain a provision for separate treatment of contribution and non-contribution accounts, per *Carey v FEC*

³ The details of liquid democracy are mostly outside the scope of this document. In summary, a liquid democracy is a direct democracy with transferable proxy; that is, where every citizen is permitted to vote directly on every issue, as well as to proxy their vote to others (with various optional restrictions), who are allowed to proxy it in turn, etc. See <https://makeyourlaws.org/introduction> for more.

2. Activities that empower voters, such as enabling voters to discuss, draft, qualify, and enact legislation through voter initiatives or lobbying; and democratized fundraising and advertising for all kinds of political recipients.

All three MYL entities are non-partisan.⁴ This means that contributions would not be restricted to any political party or candidates thereof, nor would we favor some party over another. For instance, MYL PAC would be conducting earmarked contributions *both* for and against any particular politician; MYL C4 would be conducting earmarked contributions *both* for and against any particular voter initiative; and MYL C3 would be helping to get *all* voters registered and out to vote. We aim to be a neutral, non-partisan platform.

There are three caveats to this commitment to non-partisanship.

First, our own objectives may happen to be supported more by one party than another. Although we would be blind to party affiliation for our own objectives, the MYL group (primarily MYL C4) may end up contributing or lobbying in different amounts, e.g. if one party supports a measure that furthers our objectives that another party opposes.

Second, while we would not act intentionally to skew contributions one way or another, it may happen to be that one party's supporters are more active than another's in using our services⁵.

MYL C3's neutral fact checking activity may happen to benefit one side more than another; e.g. if one side systemically skews facts more than another, we would not hesitate to make that visible. Our objective in this regard is to ensure that voters make decisions based on the best available information and are protected against disinformation — not to favor one party over another.

Finally, in the longer term, the MYL group may act as a temporary organizational umbrella for users that have not yet established its own separate entity. For instance, MYL C4 may assist our users in getting a proposition to ballot by acting as the proponent of record, gathering signatures, etc., until they have enough funding to viably split off into a separate entity, or help with the accounting and regulatory needs of establishing such entities for our users. MYL PAC may independently run user-submitted advertisements on issues for which there is not yet a suitable separate PAC. This would in any case be done in a neutral fashion, delegating partisan decisions to our users and simply exercising oversight to ensure that relevant laws and regulations are followed.

We would encourage and help any such activity to be split off into separate entities as soon as it is viable to do so, so that we can concentrate more on our own objectives⁶, and allow activists who are not neutral to take more control of the direction and strategy of particular campaigns. Our goal here is again a non-partisan one serving the public interest: we want to lower the bar to direct democratic participation in political process, and enable a broader range of views to be aired, so that citizen activists who have great ideas but not-so-great existing organizational support are not faced with major financial, organizational, and regulatory hurdles (of the

⁴ Throughout, "nonpartisan" is used per the IRS' definition and that of MYL's bylaws, as elaborated here. We understand that the FEC sometimes uses "partisan" to refer to essentially any election related activity. This distinction is already captured by our terms regarding recipients, and we feel it important to underscore our party neutrality.

⁵ e.g. currently ActBlue (a democratic PAC) processes significantly more transactions than ActRight (its republican equivalent)

⁶ i.e., liquid democracy and structural improvements to the current political process, as discussed earlier

sort that we face in our own operations) simply to *begin* acting politically⁷.

Aside from such potential temporary umbrella activity, and of course MYL C4's own lobbying on core (non-partisan) MYL issues, we would generally strongly prefer to act merely as an organizational intermediary. We are far more interested in helping to fix fundamental structural problems with the existing system than in running advertising campaigns or wading into tactical partisan political battles ourselves.

The three MYL entities will jointly own and operate a single website⁸ and associated code,⁹ logos, trademarks, etc. This website's users¹⁰ would be able to use the website to contribute variously to MYL PAC, MYL C4, and/or MYL C3 directly, as well as to any third parties for which MYL entities may act as conduits, using a single interface.

Our website's payment handling system would automatically assign contributions to the appropriate MYL entity and account that for processing.¹¹ To the extent possible, the website would be paid for by the MYL entities proportionally to their receipts.

One constraint that MYL C3 has by IRS and FEC regulations, as well as by its own bylaws, is that no MYL C3 funds may go to a non-501(c)3 (e.g. MYL C4 or MYL PAC), though the latter *are* permitted to contribute (irrevocably) to MYL C3.

Users would be able to participate in neutrally operated discussion forums on policy issues, "vote" internally on what issues deserve more or less of our attention, advise MYL C4's lobbying activity, propose new legislation to be considered for ballot qualification, help with moderating the website, broadcast their activities to their friends through social media, assist in MYL C3's non-partisan fact-checking activity, etc.

Although we would primarily operate online, we may also operate in some part offline, such as by sponsoring public debates, enabling in-person grassroots organizing through local meetups, conducting outreach activity such as talks at conferences about liquid democracy, etc.

Breakdown of MYL entities' operations

Make Your Laws, Inc. (MYL C3) is a 501(c)3 nonprofit organization. MYL C3 intends to engage in nonpartisan

⁷ This application itself is an illustration of this point. Most activists would not be interested in or capable of spending their time on working out the nuances of regulation discussed here, and having to do so independently would be a strong disincentive for a small activist group with under-represented views to starting a PAC. Since we already incur those startup costs, we would like to save new groups some of the work during their formative phase, so that they stand more of a chance of surviving into "adulthood".

⁸ <https://makeyourlaws.org>

⁹ <https://github.com/makeyourlaws> — all or nearly all of MYL's code will be open-source licensed (e.g. except where we are contractually prohibited, or for certain aspects of security that need to be private)

¹⁰ referred to just as our "users" below, since they constitute a single class

¹¹ e.g. allocating contributions for nonpartisan get out the vote campaigns or third party 501(c)3 organizations to MYL C3; contributions for voter initiative committees or lobbying to MYL C4, or contributions for political committees to MYL PAC.

exempt activity, such as voter education, registration, and/or participation activities and/or public forums conducted in a strictly nonpartisan manner.¹² This would include things such as non-partisan fact checking; developing tools of general use, such as open source software to better represent changes to the law or to better interact with government data; non-partisan research about the activities of political entities; moderating MYL's website forums to ensure courteous and collaborative discussions; checking users' identities; helping users register to vote; sending large-scale mail, email, or telephone reminders to vote, irrespective of party affiliation¹³; polling users online about their voting habits, political views, demographics, etc., for use in non-partisan analysis and reporting; etc.

MYL C3 would not contribute any money or in-kind contributions to any 501(c)4 or political committee¹⁴ including MYL C4 or MYL PAC, nor would it act in any way as a political committee in any jurisdiction.

MYL C3 would help to develop open source¹⁵ software and data. Since this software and data would be both free for use to the general public and jointly owned by the MYL group, we do not consider its use in particular by MYL C4 or MYL PAC to constitute an in-kind contribution from MYL C3.

Since we consider the non-partisan / non-contribution aspects of our joint website to be operated by MYL C3, we do not consider its involvement in them (e.g. for discussion moderation or fact checking) to be a contribution to MYL C4 or MYL PAC's activities, but rather bona fide exempt activity by MYL C3 itself.

Finally, MYL C3 may act as a conduit and solicitor for contributions to other 501(c)3 entities that are aligned with our goals, such as the Open Source Initiative, Electronic Frontier Foundation, American Civil Liberties Union (ACLU) Foundation¹⁶, Participatory Politics Foundation, and Sunlight Foundation.

In essence, MYL C3 would handle the aspects of MYL's own goals that do not involve contributions to any political entity or specific political advocacy.

¹² This is a direct quote of the IRS' guidance: <http://www.irs.gov/newsroom/article/0,,id=154712,00.html>
<http://www.irs.gov/charities/charitable/article/0,,id=163395,00.html>

¹³ Quoting the IRS; note again the implicit definition of "non-partisan": "Section 501(c)(3) organizations are permitted to conduct certain voter education activities (including the presentation of public forums and the publication of voter education guides) if they are carried out in a non-partisan manner. In addition, section 501(c)(3) organizations may encourage people to participate in the electoral process through voter registration and get-out-the-vote drives, conducted in a non-partisan manner. On the other hand, voter education or registration activities conducted in a biased manner that favors (or opposes) one or more candidates is prohibited." <http://www.irs.gov/newsroom/article/0,,id=154712,00.html>

Although not relevant to MYL C3, which will make no such contributions, we interpret "or opposes" as having an *exclusive* "or". E.g. MYL PAC's conduit contributions both for *and* against any given politician are non-partisan as well.

¹⁴ Though it may pay proportionally to its receipts as part of splitting shared organizational costs across MYL for things such as shared employees' salaries, website operations, acquiring external data, etc., and may sell or buy information or services to/from a 501(c)4 or PAC, this does not constitute a "contribution" in either direction, since it would be a bona fide payment for actual services rendered or items of value exchanged.

¹⁵ "open source" as defined by the Open Source initiative; see <http://opensource.org/docs/osd>

¹⁶ which is a 501(c)3 — as opposed to the American Civil Liberties Union proper, which is a 501(c)4

Make Your Laws Advocacy, Inc. (MYL C4) is a 501(c)4 advocacy organization which is or will be registered in various non-federal jurisdictions as a non-candidate committee¹⁷, but will not register with the FEC nor (in the FEC's terms) act as a "political committee".

MYL C4 intends to primarily engage in political activity not related to the election of particular politicians, such as issue advocacy, voter initiatives, and lobbying.¹⁸

Secondarily, as a non-majority part of its activity, and only as permitted by FEC and IRS regulations, MYL C4 may conduit contributions for the independent expenditure / non-contribution accounts of Super PACs.

MYL C4 will not contribute to any campaign committees, political parties, PACs' contribution accounts, etc ("restricted politician-related recipients"), but may contribute to a minor extent to independent expenditure only accounts. MYL C4 may also help ensure that MYL entities' costs are proportional to their revenue by contributing to MYL C3, or (minorsly and only as permitted) to MYL PAC's non-contribution account.

In essence, MYL C4 would primarily handle all of the MYL group's non-politician-related contribution activity, such as well as any lobbying, voter initiative proponentcy, etc.

Make Your Laws PAC, Inc. (MYL PAC) is an FEC registered non-connected hybrid¹⁹ Super PAC 527 corporation. MYL PAC intends to solicit contributions from the general public destined towards a full range of political recipients.

MYL PAC primarily intends to act as a conduit for earmarked contributions.²⁰ However, MYL PAC would also solicit direct²¹ contributions to support MYL PAC's own activities.

MYL PAC may also make irrevocable contributions to MYL C4 or MYL C3, e.g. in return for *bona fide* services rendered, to carry out contributors' earmarks, or to proportionally balance MYL entities' revenue to costs.²²

In essence, MYL PAC would handle all of MYL's politician-related contribution activity, both at federal and

¹⁷ to use California's terminology; other states will vary but be essentially equivalent

¹⁸ i.e. "non-election activity", in accordance with the FEC's guidance in AO 1989-32 and AO 1984-41. In order to have a cleaner separation of restrictions (e.g. regarding foreign national contributions, addressed in a question below), MYL PAC would handle the corner case of voter initiative committees that are sponsored by a candidate in ways that invoke politician-related restrictions, so that MYL C4 avoids commingling restricted and non-restricted funds.

¹⁹ In accordance with the FEC's guidance following *Carey v. FEC* and *SpeechNow v. FEC*

²⁰ within the meaning of 11 CFR 110.6

²¹ We use "direct" vs "earmarked" to distinguish contributions and contributors that are to a MYL entity itself vs to an end recipient for which that entity is acting as a conduit. Although non-federal candidate-related activity is not encompassed by 11 CFR 110.6, some states (e.g. California) have essentially equivalent provisions for earmarking and conduit of state-level candidate-related contributions, so we use "conduit" for both and distinguish the two as federal vs non-federal.

²² In principle, we simply want to ensure proportionality of costs to revenue, in line with the FEC's recommendations for revenue-proportional splitting of shared expenses in other contexts, e.g. to cover minor fluctuations in receipts or to reimburse proportionally for shared expenses that have to be paid out by one entity due to vendor limitations, like if a website hosting bill is charged to only one entity's account but should really be shared.

non-federal levels²³.

PART V

3a. Our volunteer officer-directors are qualified by their interest and experience in liquid democracy and related topics, which are the goals of MYL C3. Each currently works no more than a couple hours per week for MYL C3.

Sai is in charge of the general direction of the company as well as preparing all filings, etc.

Zhen Elizabeth Fong-Jones is in charge of reviewing filings, executing any financial transactions involving Sai's compensation (e.g. reimbursements), and co-executing any major transactions.

Nick Staddon is the custodian of records, and reviews any major financial transactions; for safe harbor purposes, he has read access to our financial records but does not have financial execution authority.

3b. The officer/directors of MYL C3 are also officer/directors of MYL C4 and MYL PAC (as above).

Each of the three corporations holds essentially the same overall goals (i.e. the promotion of liquid democracy), but addresses that goal in different ways (see Part IV).

Currently, nobody is compensated by any of the three affiliated corporations (except reimbursement of expenses). However, this may change in the future (particularly for MYL PAC), so in the spirit of transparency, we are disclosing this potential compensation (which would be at the market rate for services rendered to MYL PAC or MYL C4, and commensurate with each corporation's gross receipts).

5a. Our conflict of interest policy is in our bylaws (attached), Article 9.

Part VI

1a & b.

(A) We may in the future provide the public with a non-profit donation website that makes it easy for them to, in a single visit, contribute 'earmarked' funds towards a wide variety of organizations. MYL PAC and MYL C4 plan to do so in the near future for contributions to political entities (MYL PAC handling contributions to candidates, parties, and PACs; MYL C4 handling contributions to other 501(c)4s and "Super PAC" non-contribution independent expenditure accounts).

We may include 501(c)3 recipients as well, which would be handled by MYL C3. MYL C3 would pay costs associated with the 501(c)3 earmarks, like credit card processing, its share of website maintenance, etc. MYL C3 would then itself contribute to the donor's requested organizations in the amount the donor requested, minus directly related expenses.

(B) MYL C3 may also engage in strictly non-partisan voter education (such as fact checking political claims, conducting background research on topics relevant to neutrally informing voters about current issues, etc),

²³ though MYL PAC intends to maintain separate federal and non-federal accounts, per the FEC's guidance

non-partisan "get out the vote" drives (such as reminding voters when it is time for them to vote, helping them to register, etc), and similar activity.

(C) This activity is planned but not current.

In no event will MYL C3's funds be used to financially benefit any individual except as fair market compensation for services rendered and similar permitted purposes.

PART VIII

2a. Although MYL C3 is electing under 501(h) as a safeguard, it does not plan to spend any money at all on lobbying, political contributions, or similar activity. That activity will be handled exclusively by MYL C4 and MYL PAC.

4a. We plan in the future to accept donations on our website (including as part of the activities described in VI(1a,b) above), as well as to solicit grants on an ad hoc basis from public and private institutions that support our objectives.

We may supplement this with other forms of solicitation in the future; we do not have any such activity now nor any specific plans for it.

We have so far received one \$1k grant from personal solicitation, which we expect to be matched by their employer upon receipt of our 1023 determination letter. This will go to cover the filing fee for this 1023, as well as reimbursing the principles for MYL C3's expenses to date.

4c. See above, section VI(1a,b).

4d. We intend to operate nationwide, primarily fundraising on our own behalf.

4e. We do not intend to keep separate bank accounts for contributions, nor to give contributors any discretion as to our use of funds, except for earmarks (which will be given as directed by the contributor to permitted recipients, minus costs) and possibly in the case of unusually large grants made to benefit MYL C3 itself (which may come with some such requirements of us).

As described above in VI(1a,b), we do intend to give normal contributors the ability to 'earmark' funds donated to MYL C3 for a qualified 501(c)3 recipient of their choice, and to generally follow donors' requests for such disbursement.

We do not have any current such program, nor any written materials associated with it.

10. MYL C3 jointly owns copyright and trademark in the code for our website, and the name and logo "Make Your Laws", with MYL C4 and MYL PAC.

Our code is open source and licensed for free to the general public under an open source license.

Once MYL C3 engages in fact-checking activities and similar work as described in VI(1a,b) above, we expect that this would generate copyrighted works. We expect to make such works available to the public for free and openly licensed (e.g. under Creative Commons) as well.

11. Our software is open source, and our fact-checking or similar activities would likely also be conducted in

the spirit of open source development. This means in part that the MYL group will accept contributions of copyrighted work (e.g. computer code, fact-checking articles, logos, artwork, etc).

We do not intend to sell such work to third parties, only to use it ourselves and publish it under open licenses (except for logos and trademarks). Acquiring the copyright is simply a necessity in case we have to engage in IP related litigation (which we will try to avoid).

13b. See VI(1a,b) above.

We consider enabling ordinary individuals to easily contribute to a wide array of entities, within the limits of the law and in the fashion of liquid democracy, to directly further our purpose of promoting liquid democracy itself.

Since funds would be disbursed according to contributors' wishes, we do not expect to have any particular relationship with recipient organizations other than to the extent of e.g. arranging payment methods, working with recipients to create accurate profiles of their activity on our website for our users' perusal and decision-making, etc.

13e. We would keep full records of contribution amounts, requested conditions of disbursement, etc.

13g. We would not give any significant amount of our own resources (i.e. aside from funds earmarked by a contributor for that purpose) to third party recipients. As such, our own resources would be used to further our exempt purpose by making a better website for our users, furnishing them with more information about potential recipients, etc.

As such, we do not require oversight of third party recipients, except to ensure their 501(c)3 qualifications and that donors' money goes where the donor chooses.

We would use official IRS resources to verify recipients' 501(c)3 status.

15. See V(3b).

PART IX

15. See VI(1a,b).

2012 #23: 9 books on legislative law & process (paid for by President, pending reimbursement)

2015 #23: \$400 form 1023 filing fee.

19. \$1k donation in June 2015, expected to be employer-matched 1:1 after 1023 determination letter. \$400 1023 filing fee in July 2015.