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Explanation of amendments, difficulties, reasons for dollar amount disparities submitted by candidate, Mary M Headrick for our campaign committee C00559062 in explanation of amendment on 2/15/2015 for our PreGeneral report and the RFAI 15330074612 of February 12 asking for explanation.

1) On October 22, 2014 my treasurer, Sunny Murray, submitted our pregeneral report while she was traveling and, apparently, the report submission did not use the most recent data so the original pre-general report was inaccurate. On 12/13/2014 we worked together to submit our post general/fourth quarter using the correct data file and merely amending to correct candidate designations and correct double entries. We did not realize that the pregeneral on record was based on incomplete data entry. The amendment we submitted on 12/13/2014 had the full data file and we thought that was already submitted. Looking at the 12/13/2014 pregeneral amendment we find \$12,350 in itemized contributions, (the 10/22/2014 showed only \$5,600 and was incomplete). The 12/13/2014 unitemized contributions of \$3900 is correct (the 10/22/2014 showed \$250 and was incomplete). We also showed \$2606 in political party contributions, none of which appeared in the incomplete 10/22/2014 pre-general report. So the primary error in the 10/22/2014 filed original pre-general report was that it was based on the wrong version of our data file. We simply do not know why this error occurred.

Therefore, in answer to the income disparity, most was due to our report filing error.

With respect to the other amount differences we sought advise on how to enter and designate our credit card charges and redesignated the charges on the day the obligation was made and to whom (the committee versus the candidate) the charge was made. This changed the amount seen as a candidate contribution and the expense incurred in the pregeneral period. Therefore, the expenses rose from the \$10,849 of the original 10/22/2014 pre-general report to the new, higher amount of \$65,161.14 reflecting when the charges were made rather than when we obtained the invoice with the amounts. The uncertainty arose because we had a credit limit much lower than the amount of the printing and mailing bills and we had to guess and cover the bill prior to the actual charge, before the actual invoice and bill came back. For example, we had \$16,005.36 'on credit' with American Express on the days that the actual printing bill of \$2,234/63 and mailing bill of \$9,280 were actually posted. We also had \$35,000 as the upper limit for the mailing bill of \$31,343.69. We had to guarantee the amounts before we new the final amounts.

As the candidate, it was my intention to limit my personal contribution to \$10,000 but, in the end, I will wind up paying about \$30,000 to my campaign. Many of the smaller amounts that I charged on behalf of our campaign were listed as 'advance by candidate' but wound up as the designation 'donation by candidate' in the formal FEC reports. Now that all dollar flows have settled with the actual charged dollar invoices, I believe that I donated \$about \$8,700 during the pregeneral period but I did not know that at the time. At the time, I viewed it as a charged advance that I was guaranteeing with the expectation that the bill, when received, would be paid by the committee. Unfortunately, our donations did not cover that amount so, in hind site, it is a donation. I tried to place text comment for the entries reflecting the above prose explanation.

Neither I nor the treasurer, Sunny Murray, have ever gotten the print function to work on the FEC program, so we rely on the posted report to see a pdf print copy. This makes it particularly difficult to check the unitemized donations.

We have electronic or print records of everything, but as noted above, some the documentation with actual amounts came to us after the election and after the reporting period. They

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were not formal loans and refunds so they did not lend themselves to the report designations. By the same token, my final donated amount is greater than intended and it is not clear if the charges I made for campaign the campaign were advances (not a program option), loans or donation. If you view the ~\$8700 I wound up paying for the pregeneral bills then I filed to file a 48-hour notice for the amount. I did not actually pay it until November when the dust settled and I determined what the committee paid for compared to what I got stuck with.

With respect to the many amendments filed before the latest, we did not realize that a 48-hour notice did not have to be reentered in the quarter report so we had double entries. Also, the treatment of inkind donations, expenses led to three colored entries in the working file. We never figured out the color coding key for those and kept doing amendments until the correct amounts showed on the reports. We were not familiar with the electronic filing software and never found it friendly to use. We did our best. We believe the final report filed today with the designations given in the 2/15 text fields are accurate. There are designation ambiguities of the FEC software so you still may wish changes. For that reason, I will await acceptance of this pregeneral before proceeding with a termination of the committee request.

Please let me know what else you wish.

Yours, Mary M Headrick, candidate
Headrick for Congress Committee C00559062
February 28,2015

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