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February 18, 2015

Vicki Davis
Senior Campaign Finance Analyst
Federal Election Commission
999 E St., NW
Washington, DC 20463

Identification Number: C00558510

Reference:Amended 12 Day Pre-Primary Report (04/01/2014-06/04/2014)
Amended July Quarterly Report (06/05/2014-06/30/2014)
Amended 12 Day Pre-Run-Off Report (07/01/2014-08/06/2014)
Amended October Quarterly Report (08/07/2014-09/30/2014)

Dear Ms. Davis:

Thank you for taking time to speak with me on the telephone last week. As you suggested, we are filing this Form 99 to respond to your RFAs relating to the amended Forms 3 listed above.

Steve Russell for Congress is in receipt of your requests for additional information, dated 01/14/2015, 01/14/2015, 01/19/2015 and 01/19/2015, regarding certain increases in debts owed to vendors listed in the Summary Page of the amended reports relative to those disclosed in the original reports (or as previously amended).

The following are the total dollar amounts of non-loan debt obligations reported in the latest amended reports by reporting period:

Total Outstanding Debts at End of Reporting Period

Pre-Primary: \$28,352.64
July Quarterly: \$112,333.85
Pre-Runoff: \$62,386.63
October Quarterly: \$151,659.61

The total increase in debts for each period that is the subject of the RFAs are:

Total Reconciling Items for RFAI by Reporting Period

Pre-Primary: \$28,352.64
July Quarterly: \$84,207.00
Pre-Runoff: \$23,778.36
October Quarterly: \$32,050.27

The following is a listing of outstanding debt by vendor and by reporting period as reported in the latest amendments. Specific amounts comprising the reconciliation amounts listed above and in the RFAs are denoted with an asterisk (*); amounts without an asterisk were already reported in earlier reports.

Vendor= Singularis Group LLC
Pre-Primary: \$28,126.85* incurred for Campaign Mailers

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July Quarterly: \$12,159.58* incurred for Campaign Mailers and \$30,000* incurred for Primary Election Consulting Bonus
Pre-Runoff: (\$40,286.43) PAID and \$20,276.01* incurred for Campaign Mailers
October Quarterly: (\$20,276.01) PAID; \$12,583.91, \$1,737.61* and \$1,639.00* incurred for Campaign Mailers; and \$5,000.00 incurred for general campaign consulting

Vendor= OH-K Fast Print
Pre-Primary: \$225.79* incurred for Fundraiser Invitations
July Quarterly= (\$225.79) invoice PAID

Vendor= New Valley Forge Partners LLC
July Quarterly: \$11,996.05* incurred for Campaign and fundraising consulting and expenses
Pre-Runoff: (\$11,996.05) PAID
October Quarterly: \$21,935.00 incurred for Primary Election Consulting bonus; \$19,926.01 incurred for Campaign and fundraising consulting and expenses; \$5,000 incurred for campaign consulting retainer

Vendor= McIntyre Law
July Quarterly: \$133.85* incurred for supplies
Pre-Runoff: (\$133.85) PAID

Vendor= Thompson Communications
July Quarterly: \$21,309.25* incurred for Advertising Communications Media Buy
Pre-Runoff: (\$21,309.25) PAID

Vendor= Heartland Campaign Management
July Quarterly: \$3,438.19* incurred for fundraising consulting and expenses

Vendor= Nathan Adams
July Quarterly: \$5,170.08* incurred for travel expense reimbursements
Pre-Runoff: \$3,502.35* incurred for travel expense reimbursements
October Quarterly: \$4,684.66* incurred for travel expense reimbursements

Vendor= Steven Dane Russell
October Quarterly: \$353.80 for expense reimbursements

Vendor= Andrew Speno
October Quarterly: \$2,500.00 for media consulting

Vendor= Castle Strategies LLC
October Quarterly: \$8,100.00 for email marketing

Vendor= Western Phone Strategies
October Quarterly: \$23,989.00* for Voter Identification calling

Vendor= Aristotle International, Inc.
October Quarterly: \$2,100.00 for campaign software licensing

Your request was for clarifying information as to why the activity underlying the obligations listed above and denoted with the asterisks was not disclosed on the original reports.

As initially organized, the financial management of the campaign committee was arranged in a de-centralized manner, in

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which the treasurer (a volunteer) was primarily in charge of contribution compliance and FEC reporting, the assistant treasurer (a volunteer) primarily oversaw expenditures, day-to-day bookkeeping was carried out by an independent contractor, and FEC reporting was done by a second independent contractor, all on a part-time basis. Accordingly, any communication lapses or untimely referrals of invoices and other financial documents occasionally occurring could only be addressed as the persons who were donating their time had availability.

Several of these occurrences related to a certain number of invoices from vendors and contractors for products supplied and services performed during the course of the campaign that were either not received by the appropriate campaign staff or not forwarded to the bookkeeper and/or FEC reporter in a timely manner, remained unpaid, and were not included in the appropriate reports as originally filed.

Some of the affected invoices were recorded as expenditures in the period when paid rather than as campaign obligations when incurred (i.e., the debts noted as PAID in the listing above), and so certain of the invoices eventually paid off as well as invoices that still remain unpaid at present in fact constituted for a time obligations of the committee which should have been disclosed in the FEC reports covering the period incurred. Failure to properly amend and report these obligations during the appropriate period also could potentially affect the ability of the treasurer to gauge the amount of campaign debt outstanding for purposes of accepting contributions designated for election cycles where the primary, runoff, or general election had already taken place.

Once a determination was made by the officers of the campaign that these amounts were non-loan obligations of the committee and had not been reported as such, a concerted effort was initiated to gather and examine the unpaid billings and assign the associated debt obligations to the appropriate time periods and correct the respective reports, resulting in the series of amended reports filed on October 24, 2014.

We trust that this gives you the clarifying information that you requested. The committee will also shortly be filing an additional amended report to address and correct the discrepancy noted in your RFAI dated January 19, 2015 on the Amended 12 Day Pre-Run-Off Report (07/01/2014-08/06/2014).

Thank you for your time and attention to this matter. If you have any additional questions related to these RFAIs please do not hesitate to contact me.

Sincerely,

Robert J Crookshank
Treasurer