



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 29, 2019

ROGER UPTON, TREASURER
REYNOLDS FOR CONGRESS
PO BOX 15388
ROCHESTER, NY 14615

Response Due Date
07/03/2019

IDENTIFICATION NUMBER: C00336065

REFERENCE: OCTOBER QUARTERLY REPORT (7/01/2018 - 9/30/2018) AND
YEAR-END REPORT (10/01/2018 - 12/31/2018)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the reports referenced above. This notice requests clarification concerning the disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in further Commission review. Additional information is requested for the following item(s):

Your most recent report discloses a significant amount of residual cash on hand. While a committee of a former candidate or officeholder may remain open for winding-down purposes, your reports do not appear to indicate that the committee is winding down. In addition, your 2018 October Quarterly and Year-End Reports disclose disbursements that suggest ongoing activity unrelated to winding down. Since the candidate did not participate in an election since 2008, please clarify the residual funds balance, the nature of the reported disbursements, and the current status of the candidate and the committee.

In addition to defraying expenses in connection with a campaign for federal office, the funds in a campaign account may be used to defray the costs of winding down the campaign, including winding down the office of a former federal officeholder for a period of six months after he or she leaves office. 11 CFR §113.2. A campaign committee that no longer receives any contributions or makes any disbursements that would otherwise qualify it as a political committee may terminate, provided that such committee has no outstanding debts or obligations. The committee may file a termination report or request with the Commission, providing a statement concerning the disposition of residual funds. 11 CFR §102.3.

Committee assets, including cash-on-hand, may not be converted to personal use. Personal use is any use of funds in a campaign account of a present or former candidate to fulfill a commitment, obligation or expense of any person that would exist irrespective of the candidate's campaign or duties as a federal office holder. 11 CFR §113.1.

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Please provide clarification regarding the residual funds balance and the committee's status in regard to winding down. If the candidate intends to redesignate the committee as a principal campaign committee for a future election or convert it to a multicandidate political committee, please clarify this for the public record.

In addition, please review the purposes of disbursements in question (attached) and provide clarification regarding their nature. If the disbursements in question constitute personal use, the committee should seek reimbursement for the appropriate amount of the personal use violation from the beneficiary. In addition, you should show this reimbursement on Schedule A supporting Line 15 of the Detailed Summary Page of the report covering the period in which the reimbursement is received. If the disbursements in question were incompletely or incorrectly reported, please amend your original report(s) with the clarifying information. If the expenses were incurred because candidate is testing the waters for a future election, please clarify to which election the disbursements relate.

Please respond within 35 days of this letter. Please note, you will not receive an additional notice from the Commission on this matter. **Requests for extensions of time in which to respond will not be considered.** Any response submitted by your entity will be placed on the public record and will be considered by the Commission prior to initiating any further review of this matter.

For additional information about reporting, please visit <http://www.fec.gov>. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll free number (800) 424 9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1130.

Sincerely,



Nataliya Ioffe
Chief, Authorized Branch
Reports Analysis Division

Apparent Personal Use of Campaign Funds
Reynolds for Congress (C00336065)

Name	Date	Amount	Purpose
Huckaby Davis Lisker Inc	9/30/18	\$1,105.60	Compliance Consulting
Huckaby Davis Lisker Inc	12/11/18	\$553.20	Compliance Consulting