



150 South Fifth Street, Suite 3000
Minneapolis, MN 55402
Phone: 612.339.8682
Fax: 612.672.3200

Richard G. Morgan
Direct: 612.672.3240
Email: richard.morgan@bowmanandbrooke.com

RECEIVED
FEC MAIL CENTER
2019 JUN 10 PM 12:15

June 4, 2019

Romy Adame-Wilson
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division
999 F St. NW
Washington, D.C. 20004

Re: Identification Number: C00658815
Reference: Amended 30-Day Post Election Report

Dear Ms. Adame-Wilson:

This letter is provided in response to your correspondence of May 12, 2019, regarding Right Now USA's Amended 30 Day Post-General Report (10/18/2018 – 11/26/2018), received 02/12/2019, Identification Number C00658815. A copy of this letter is attached. We appreciate the opportunity to provide additional information in response to your preliminary review of this report. Below, we provide information you have requested about the following two items:

1. Our amended report does not disclose a decrease in receipts totaling \$50,000. Review of the amended and original reports show the same amount of receipts, that amount being \$170,000. We do agree that the amended report shows a decrease in disbursements of \$50,037.96. Our original report had a disbursement to 1854 Inc. of \$56,700 that was in error. The correct amount was \$6662.04, which is reflected on the amended report. The difference between \$56,700 and \$6662.04 captures the decrease in disbursements of \$50,037.96.
2. On the 24-hour report, we had technical issues getting the Form 9 reports filed on 10/31/2018. Jeff Martin, our contract controller, reported on 10/30/2018 that he could not find Form 9 on the FEC software that had been downloaded for him. However, Martin then reported having submitted the filing on October 31st. See attached copy of email thread. When we did not see the Form 9 filings on the FEC portal, the Form 9 reports were sent manually to my office. Those reports were then filed again by my assistant on 11/01/2018. We have since changed our controller and updated our reporting capabilities.

Romy Adame-Wilson
June 4, 2019
Page 2

Thank you for your consideration. Please advise if you require more information or have any questions.

Very truly yours,



Richard G. Morgan

RGM/hc
Enclosures

20190604 10:00 AM RGM/hc



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 12, 2019

RICHARD MORGAN, TREASURER
RIGHT NOW USA
8200 HUMBOLDT AVE. SOUTH SUITE 302
MINNEAPOLIS, MN 55431

Response Due Date
06/17/2019

IDENTIFICATION NUMBER: C00658815

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/18/2018 -
11/26/2018), RECEIVED 02/12/2019

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in enforcement action.** Additional information is needed for the following 2 item(s):

1. Your amended report discloses a decrease in receipts totaling \$50,000.00 and a decrease in disbursements totaling \$50,037.96 from the amounts disclosed on your original report. Please amend your report or provide an explanation to clarify why this additional activity was not provided with your amended report. (11 CFR § 104.3)

2. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 24 hour report(s) regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty days before an election. The report must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(b))

- On Schedule(s) 11a(i) of your report you have disclosed a transaction(s) for

201905120300039975

RIGHT NOW USA

Page 2 of 2

\$0.00. For your information and consideration when preparing future filings, only transactions with an actual monetary value should be itemized on your report. If the amount for this transaction(s) was entered in error, please amend your report to include the correct amount(s). (11 CFR §104.3)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit <http://transition.fec.gov/rad/>. 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) 694-1139.

Sincerely,



Romy Adame-Wilson
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

NOTICE TO THE PUBLIC

**Late 24 Hour Report (Schedule E)
RIGHT NOW USA (C00658815)**

Name of Payee	Dissemination Date	Amount	Candidate	Election	Report Received
AppNexus	10/30/18	\$5,000.00	Emmer, Thomas Earl	G2018	11/1/18
AppNexus	10/30/18	\$54,500.00	Hagedorn, James	G2018	11/1/18
Facebook	10/30/18	\$10,000.00	Hagedorn, James	G2018	11/1/18
AppNexus	10/30/18	\$4,500.00	Housley, Karin	G2018	11/1/18
AppNexus	11/30/18	\$43,000.00	Hughes, Dave	G2018	11/1/18
AppNexus	10/30/18	\$8,800.00	Lewis, Jason	G2018	11/1/18
AppNexus	10/30/18	\$4,500.00	Paulsen, Eric	G2018	11/1/18
Facebook	10/30/18	\$5,000.00	Ryan, Gregory	G2018	11/1/18
AppNexus	10/30/18	\$5,500.00	Stauber, Pete	G2018	11/1/18
Facebook	10/30/18	\$2,500.00	Zelinski, Jennifer	G2018	11/1/18

2019-10-09 10:01:00 AM 0027644M

Holly Campbell

From: Albin Andolshek <aandolshek@trybrick.com>
Sent: Monday, June 03, 2019 2:42 PM
To: Richard Morgan
Cc: Jennifer O'Donnell
Subject: FW: Internet Fax Job

See the dates here.



ALBIN ANDOLSHEK
BRICK, Inc. | www.trybrick.com
President • 612.351.3232 EXT. 108

From: Holly Campbell <Holly.Campbell@bowmanandbrooke.com>
Date: Thursday, November 1, 2018 at 12:33 PM
To: Richard Morgan <Richard.Morgan@bowmanandbrooke.com>, Albin Andolshek <aandolshek@trybrick.com>, Jeffrey Martin <jmartin@trybrick.com>
Subject: RE: Internet Fax Job

And the form has been filed and accepted.

Holly Campbell
Bowman and Brooke LLP
Direct: 1.612.656.4027

From: Richard Morgan
Sent: Thursday, November 01, 2018 8:11 AM
To: Holly Campbell <Holly.Campbell@bowmanandbrooke.com>; Albin Andolshek <aandolshek@trybrick.com>; Jeffrey Martin <jmartin@trybrick.com>
Subject: RE: Internet Fax Job

Perhaps the issue is that we're just trying to file Schedule E. Perhaps it won't accept just a schedule and we have to provide all of Form 3X, and perhaps fill out the relevant portions of Form 3X with Schedule E.

Richard Morgan
Bowman and Brooke LLP
Direct: 1.612.672.3240 | Mobile: 1.612.859.8485

From: Richard Morgan
Sent: Wednesday, October 31, 2018 6:47 PM
To: Holly Campbell <Holly.Campbell@bowmanandbrooke.com>
Cc: 'Jeffrey Martin' <jmartin@trybrick.com>
Subject: FW: Internet Fax Job

Holly, I'm not sure why Jeff can't get the 24 hour notice uploaded. Give him a call and see if you can assist him. Rick

From: Jeffrey Martin <jmartin@trybrick.com>
Sent: Wednesday, October 31, 2018 12:15 PM
To: Richard Morgan; Holly Campbell
Cc: Albin Andolshek; Richard Andolshek
Subject: FW: Internet Fax Job

Hi Rick,

Not sure if this is what is needed to file today for the FEC.

Attached is the Form 9 that you sent me the link for. Please see sections where we have questions.

The only place I have used the login/password is when I upload the FEC filings. This software that I downloaded does not have a "Form-9" as part of the reporting.

The instructions you sent me the link for the Form-9, does have a fax number and/or a email address to send the Form-9 to.

Please let me know your thoughts on the Form-9 questions, and "How to File".

Thanks Rick

Jeff
C: 651-303-1380

-----Original Message-----

From: Linda Conroy
Sent: Wednesday, October 31, 2018 12:08 PM
To: Jeffrey Martin <jmartin@trybrick.com>
Subject: Internet Fax Job

Image data has been attached.

Note: This electronic mail is intended to be received and read only by certain individuals. It may contain information that is attorney-client privileged or protected from disclosure by law. If it has been misdirected, or if you suspect you have received this in error, please notify me by replying and then delete both the message and reply. Thank you.

Richard Morgan
Bowman and Brooke LLP
Direct: 1.612.672.3240 | Mobile: 1.612.859.8485

From: Jeffrey Martin <jmartin@trybrick.com>
Sent: Wednesday, October 31, 2018 6:27 PM
To: Albin Andolshek <aandolshek@trybrick.com>; Richard Morgan <Richard.Morgan@bowmanandbrooke.com>; Holly Campbell <Holly.Campbell@bowmanandbrooke.com>
Cc: Richard Andolshek <randolshek@trybrick.com>
Subject: Re: Internet Fax Job

I have not received a conformation email from the FEC. Albin said maybe Holly could help in the morning? Let me know.

Plus, for some reason I don't have access to all my email folders through "Office 365"?

Thanks

Jeff

From: Albin Andolshek
Sent: Wednesday, October 31, 2018 5:44:55 PM
To: Jeffrey Martin; Richard Morgan; Holly Campbell
Cc: Richard Andolshek
Subject: Re: Internet Fax Job

<https://www.fec.gov/data/committee/C00658815/?tab=filings>

I'm not seeing it show up on the FEC. Is there another way for us to submit this? The portal is not confirming submissions.

ALBIN ANDOLSHEK
BRICK, Inc. | www.trybrick.com
President • 612.238.4972

From: Jeffrey Martin <jmartin@trybrick.com>
Date: Wednesday, October 31, 2018 at 5:13 PM
To: Richard Morgan <Richard.Morgan@bowmanandbrooke.com>, Holly Campbell <Holly.Campbell@bowmanandbrooke.com>
Cc: Albin Andolshek <aandolshek@trybrick.com>, Richard Andolshek <randolshek@trybrick.com>
Subject: RE: Internet Fax Job

As submitted. I have not received a conformation, but, all the data was validated before we submitted the filing.

Jeff

From: Jeffrey Martin
Sent: Wednesday, October 31, 2018 4:41 PM
To: 'Richard Morgan' <Richard.Morgan@bowmanandbrooke.com>; 'Holly Campbell' <Holly.Campbell@bowmanandbrooke.com>
Cc: Albin Andolshek <aandolshek@trybrick.com>; Richard Andolshek <randolshek@trybrick.com>
Subject: RE: Internet Fax Job

Updated.

From: Jeffrey Martin
Sent: Wednesday, October 31, 2018 4:21 PM
To: 'Richard Morgan' <Richard.Morgan@bowmanandbrooke.com>; 'Holly Campbell' <Holly.Campbell@bowmanandbrooke.com>
Cc: Albin Andolshek <aandolshek@trybrick.com>; Richard Andolshek <randolshek@trybrick.com>
Subject: RE: Internet Fax Job

Albin,

The ID #'s you found are invalid?

Jeff

From: Jeffrey Martin
Sent: Wednesday, October 31, 2018 2:23 PM
To: Richard Morgan <Richard.Morgan@bowmanandbrooke.com>; Holly Campbell <Holly.Campbell@bowmanandbrooke.com>
Cc: Albin Andolshek <aandolshek@trybrick.com>; Richard Andolshek <randolshek@trybrick.com>
Subject: RE: Internet Fax Job

Hi Rick,

For your review. Let me know if you have any questions/comments/changes.

Thank you.

Jeff

From: Richard Morgan <Richard.Morgan@bowmanandbrooke.com>
Sent: Wednesday, October 31, 2018 12:28 PM
To: Jeffrey Martin <jmartin@trybrick.com>; Holly Campbell <Holly.Campbell@bowmanandbrooke.com>
Cc: Albin Andolshek <aandolshek@trybrick.com>; Richard Andolshek <randolshek@trybrick.com>
Subject: Re: Internet Fax Job

Give me a call on my cell 6128598485

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2019 JUN 10 PM 12:16

ORIGIN ID: GPZA (612) 656-4027
RICHARD MORGAN
BOWMAN AND BROOKE LLP
150 SOUTH FIFTH STREET
SUITE 3000
MINNEAPOLIS, MN 55402
UNITED STATES US

SHIP DATE: 06 JUN 19
ACTWGT: 0.50 LB
CAD: 1310080/NET4100

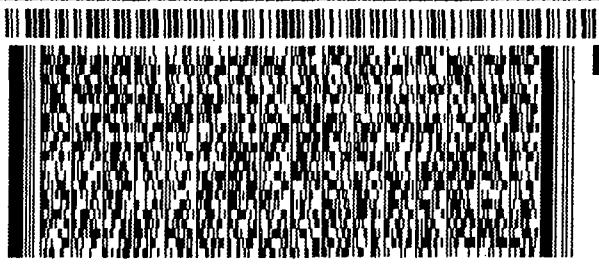
BILL SENDER

TO **ROMY ADAME-WILSON**
FEDERAL ELECTION COMMISSION
REPORTS ANALYSIS DIVISION
1050 FIRST STREET NE
WASHINGTON DC 20002

(800) 424-9530 REF: 19412
INV. PO. DEPT.

5665.11.0210.2340

RT 723 2 16:30 9471 06.10
FZ 722



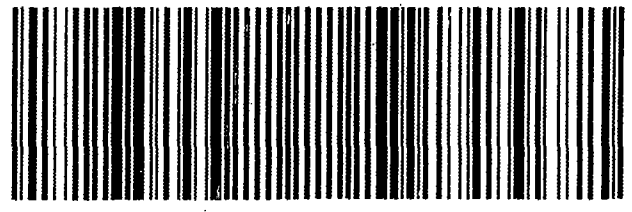
MON - 10 JUN 4:30P

TRK# 7754 1015 9471
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** 2DAY **

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20002
DC-US IAD



UNRECORDED MAIL ROOM

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Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

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<input type="checkbox"/> USPS Priority Mail Express	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <i>FED-EX</i>	Shipping Date <i>6-6-19</i>
Next Business Day Delivery	<input type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>af</i> PREPARER	<i>6-10-19</i> DATE PREPARED

20190610 10:00:00 AM