

MISCELLANEOUS TEXT (FEC Form 99)

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NAME OF COMMITTEE (In Full)

FEC IDENTIFICATION NUMBER

WALDEN FOR CONGRESS

C00333427

Mailing Address PO Box 1091

City

Hood River

State

OR

ZIP Code

97031-0037

June 12, 2025

Nataliya Ioffe  
Chief, Authorized Branch  
Reports Analysis Division  
Federal Election Commission  
1050 First Street, NE  
Washington, DC 20463

Dear Ms. Ioffe,

This letter is submitted in response to the Report Analysis Division's ("RAD") Request For Additional Information (RFAI) regarding Walden for Congress's October 2024 Quarterly and 2024 Year-End FEC Reports (C00333427). The RFAI requests clarification of certain reported disbursements and implies that these disbursements may have been for personal use. Please be advised that the Committee is aware of the personal use restrictions, conducts all activities in accordance with applicable law, and absolutely nothing on the face of the identified disbursements is suggestive of any impermissible use.

The RFAI identified 14 disbursements on the Committee's October 2024 Quarterly (7/1/24-9/30/24) and 2024 Year-End (10/1/2024-12/31/2024) FEC Reports, each of which represents an ordinary and necessary expense incurred in connection with the ongoing operation of Walden for Congress, as the purpose of disbursement descriptions plainly indicate. Nothing on the face of the identified disbursements justifies this RFAI.

The November 2024 payment to Holtzman Vogel Josefiak Torchinsky PLLC was a payment for legal services related to the ongoing maintenance of Walden for Congress, including compliance with Federal Election Commission regulations.

Walden for Congress's six disbursements to Secure Storage between July 2024 and December 2024 were for "Committee Records Storage," i.e., storage of physical and digital campaign and fundraising materials, financial records, and office equipment. The Commission has approved the use of campaign funds to pay costs related to the storage of campaign and officeholder records in Advisory Opinion 2013-05 (Gallegly) and Advisory Opinion 1993-06 (Panetta).

The six payments to Verizon Wireless between July 2024 and December 2024 are for "committee phone bill," and specifically monthly payments for Walden for Congress's phone services during the captured reporting periods. This is the committee's only remaining phone line and is used for two-factor authentication, taxes, and other administrative purposes. This phone line is not used by any individual for any personal business, and is an ordinary and necessary committee expense.

The final disbursement for which RAD seeks clarification is for the July 2024 payment to Hood River CPAs for "Accounting Services." Walden for Congress utilized Hood River CPAs for accounting services related to the preparation and filing of the Committee's corporate tax returns. Hood River CPAs' services were not used by any individual for any personal purposes and the related disbursement qualifies as an ordinary and necessary committee expense.

Each of the disbursements referenced in the RFAI was made for a permissible purpose that the Commission has previously approved. The purpose of disbursement descriptions are clear on their face and are not suggestive of any impermissible purpose. Every disbursement referenced in your RFAI was made lawfully for an expense that would not have been incurred but for the existence of the campaign committee. Moreover, these expenses fit squarely within the category of "ordinary and necessary expenses" for committee operations.

The RFAI also asks the Committee to "explain [its] intended use of the residual campaign funds." While no provision of the Act or Commission regulations requires any such explanation, the Committee intends to use its remaining funds in a

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manner that is consistent with the Federal Election Campaign Act, Commission regulations, Commission advisory opinions, and Commission enforcement matter precedent.

If you require any additional information or clarification on this matter, please feel free to contact us.

Sincerely,

Marta A. Simons

Treasurer, Walden for Congress