

Bradley Matheson
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Federal Elections Commission
999 E Street, NW
Washington, DC 20463

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IDENTIFICATION NUMBER: C00580480

REFERENCE: YEAR-END REPORT (10/01/2015 – 12/31/2015)

Dear Mr. Matheson,

This Form 99 is in response to the Commission's letter dated February 29, 2016 and to explain the Q3 Amendment that seeks to correct the issues raised by your request for additional information. The Commission requested additional information on two items.

1. Redesignation of General Election Contributions

The committee has made the determination that it should refund all funds received in connection with the general election and continues to make efforts to ensure that all refunds have been fully processed.

The committee diligently employs methods to maintain compliance with FEC regulations and to properly obtain and account for reattributions and redesignation of general election funds. As noted later in this submission, several redesignations that were actually completed did not properly appear on the originally filed reports. As a result the October Quarterly and Year End reports have been amended with the updated, accurate information. Please see below for a more detailed description.

2. Schedule B-P Contribution Refunds

Your letter highlighted a number of donors that either appeared to have made an excessive contribution, or appeared to have been refunded contributions that were not reported. We have reviewed these contributions and in so doing have confirmed that all donors are within contribution limits and that all contributions were reported in the appropriate report.

However, in an effort to refund General dollars promptly, Scott Walker Inc.'s reporting software created an error in the way the general election contributions were reported. In several cases, the general election contributions were inadvertently redesignated to the primary instead of the general election or were redesignated to the general after the submission of the Q3 report, but

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within 60 days of the contribution. The Q3 Amendment reflects the correct designation of the general funds that were subsequently refunded.

These incorrect designations in the October Quarterly Report led to the majority of the issues raised in your letter. Below, each donor at issue in the October Quarterly and the Year End Reports is addressed:

ARNOLD, DANIEL	Excess \$2,700 redesignated to the general and refunded
BERG, JAMES	Jim Berg and James Berg were merged and \$5,400 general dollars were refunded
BIERMAN, BROCK	Excess \$2,700 redesignated to the general and refunded
BLACK, KAREN	Excess \$350 redesignated to the general and refunded
BYRNS, JUANITA F	Excess \$1,000 redesignated to the general and refunded
CANNING LUPO, ELIZABETH	Excess \$2,700 redesignated to the general and refunded
CANNING, MICHAEL G	Excess \$2,700 redesignated to the general and refunded
CANNING, TIMOTHY M	Excess \$2,700 redesignated to the general and refunded
CORI, ANNE	Excess \$2,700 redesignated to the general and refunded
COURI, GERALD	Gerald/Jerry Couri were merged and \$5,400 designated to the general was refunded
COX, EDWIN L	Excess \$2,700 redesignated to the general and refunded
DEFEO, AUGUSTIN	Per the request of the donor, a joint \$5,400 check was sent to both Augustin and Barbara. The report reflects that each donor received the appropriate \$2,700 refund amount.
DELRAHIM, MAKAN	Excess \$2,700 redesignated to the general and refunded
EICH, DAVID PATRICK	Excess \$2,700 redesignated to the general and refunded
ELLIOTT, DAVID	Excess \$2,700 redesignated to the general and refunded
FARR, LELIA	This donor received a \$2,700 chargeback on 10/15/16. The refund issued on 11/16/2016 appears to be an over-refund. The committee is working with the donor to correct this.
FEROLITO, JOHN M	Excess \$2,700 redesignated to the general and refunded
FEROLITO, CAROLYN	Excess \$2,700 redesignated to the general and refunded
FLATLEY, JOHN	Excess \$2,700 redesignated to the general and refunded
FOSS, THOMAS A	Excess \$500 redesignated to the general and refunded
GAYESKI, TROY	Excess \$2,700 redesignated to the general and refunded
GIBSON, FRED D.	Excess \$2,700 redesignated to the general and refunded

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GUENTHNER, SCOTT	Excess \$2,700 redesignated to the general and refunded
HADA, JENNIFER	Excess \$2,700 redesignated to the general and refunded
HAWKINS, JAMES	Excess \$2,700 redesignated to the general and refunded
HENRY, WARNER	Excess \$2,700 was reattributed to his spouse, \$2,500 was redesignated to the general and refunded
HOROWITZ, DAVID	Excess \$2,700 redesignated to the general and refunded
HUBBARD, KAREN	Excess \$2,700 redesignated to the general and refunded
IRBY, CHARLES	Excess \$300 redesignated to the general and refunded
ISAAC, PAUL J	Excess \$2,700 redesignated to the general and refunded
JONES, WILLIAM B	Excess \$2,300 redesignated to the general and refunded
KAY, ROBERT	Excess \$2,700 redesignated to the general and refunded
KLEY, RICHARD	Excess \$2,700 redesignated to the general and refunded
KOHLER, TERRY J	Excess \$2,700 redesignated to the general and refunded
LARKIN, MARGARET	Excess \$2,300 redesignated to the general and refunded
MAUER, LISA A	Excess \$1,000 redesignated to the general and refunded. Lisa subsequently contributed \$2,000 in December 2015. This amount was redesignated and the refund is pending.
LINEHAN, DANIEL	Excess \$2,700 redesignated to the general and refunded
MANNING, LANCE A	His original contribution was presumptively reattributed to his spouse Tareneh Manning. Subsequent to the report, the donor explained this excess \$2,700 was meant for the general and requested a refund. Thus, this excess was redesignated to the general and refunded.
MCCLELLAND, NORMAN	Excess \$2,700 redesignated to the general and refunded.
MOROUN, LINDSAY	Excess \$2,700 redesignated to the general and refunded
MOROUN, MANUEL	Excess \$2,700 redesignated to the general and refunded
MOROUN, MATTHEW T	Excess \$2,700 redesignated to the general and refunded
MOROUN, NORA	Excess \$2,600 redesignated to the general and refunded
NASSEFF, STEVE	Excess \$2,300 redesignated to the general and refunded
NELSON, GRANT	At the request of the donor, Grant and Carol Nelson were sent one joint \$5,400 check. Each donor had \$2,700 redesignated to the general and refunded. The YE amendment is updated to reflect the correct amount each spouse received.
NEWHOUSE, KRISTIN	Excess \$2,700 redesignated to the general and refunded

NICHOLSON, DAVID	Excess \$2,700 redesignated to the general and refunded
NICHOLSON, D.J.	Excess \$2,700 redesignated to the general and refunded
PENNINGTON, JOAN	Excess \$2,700 redesignated to the general and refunded
PENNINGTON, ROBERT	Excess \$2,700 redesignated to the general and refunded
PODJASEK, JEFFREY E	Excess \$2,700 redesignated to the general and refunded
PODJASEK, STEPHEN T	Excess \$2,700 redesignated to the general and refunded
ROTH, NANCY B	Excess \$500 redesignated to the general and refunded
RUNDE, DANIEL	These donors approved a spousal reattribution of \$2,700 and subsequently revoked that approval after the report was submitted. Thus, the excess \$8,100 was redesignated to the general and refunded.
SCHMIDT, MARY A	Excess \$15 dollars redesignated to the general and refunded
SHARIFKHAN, MOE	Excess \$2,300 redesignated to the general and refunded
SHOEN, MARK	Excess \$4,700 redesignated to the general and refunded
SINGER, ALVIN	Excess \$2,700 redesignated to the general and refunded
TIPPIE, HENRY B	Excess \$600 redesignated to the general and refunded
TUCKER, GARLAND	Garland and Greyson Tucker were sent one joint \$5,400 check to refund their general dollars. The YE amendment is updated to reflect the correct amount each spouse received.
TYLER, JAMES R	Excess \$800 redesignated to the general and refunded
WALL, HELEN	Excess \$2,700 redesignated to the general and refunded
WALL, TERENCE	Excess \$2,700 redesignated to the general and refunded
WARNICK, NANCY	Excess \$2,200 redesignated to the general and refunded
WEERASURIYA, LU ANN	Excess \$1,900 redesignated to the general and refunded
WESTCOTT, CHART	Excess \$2,700 redesignated to the general and refunded
WESTCOTT, COURT	This donor contributed \$5,400 in total with \$2,700 reattributed to his spouse. This was a refund of his primary contribution.
WESTCOTT, JIMMY	Excess \$2,700 redesignated to the general and refunded
WILSON, DONALD	Excess \$5,400 redesignated to the general and refunded

In addition, there were some issues raised by your letter that were not corrected by the October Quarterly Amendment, so the committee has submitted an additional amendment to the Year End report as well.

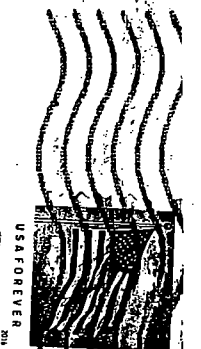
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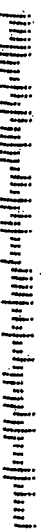
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