

MISCELLANEOUS TEXT (FEC Form 99)

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NAME OF COMMITTEE (In Full)

Blake Masters for Senate

FEC IDENTIFICATION NUMBER

C00784165

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Tucson	AZ	85732-3009

This letter clarifies some items listed in the RFAI dated 4/3/2022.

Some contributions identified in item #1 were remitted by the individual contributors in the form of bitcoin. Pursuant to Advisory Opinion 2014-02 (Make Your Laws PAC) and the Commission's Congressional Candidates and Committees Campaign Guide (rev. Oct. 2021) at pp. 14, 107, 123-24, the Committee reported the bitcoins as in-kind contributions in amounts equivalent to their market value at the time of receipt, and disclosed separately their prompt liquidation in transactions with a bitcoin exchange.

The aggregate total of each individual's contributions did not exceed, and have not exceeded, \$2,900 for the primary election and \$2,900 for the general election. Because the Commission's software does not permit any portion of in-kind contributions to be reported as redesignated to an election other than the primary election, however, the Committee was unable to indicate on its report a redesignation to the 2022 general election of those portions of the contributions that exceed \$2,900. The Committee has always treated, and will continue to treat, these redesignated liquidated bitcoin contributions (which currently constitute cash on hand) as general election contributions that are subject to the requirements of 11 C.F.R. § 102.9(e).

Although the requestor of Advisory Opinion 2014-02 had voluntarily committed to accept bitcoin contributions in amounts not to exceed \$100, nothing in the Advisory Opinion, as approved by a majority of the Commission, stated or implied that such a ceiling is compelled by law. To the contrary, Advisory Opinion 2014-02's instruction that bitcoin contributions should be reported as in-kind contributions is consistent with the conclusion that contributions in the form of bitcoin are subject to the same \$2,900 per election limit that governs other variants of both direct and in-kind contributions. See generally Advisory Opinion 1981-32 (Askew) (noting that in-kind contributions "are treated the same as contributions of money?").

There were 3 individuals who appeared over the limit that were not bitcoin contributors. Charles Dunlap is reflected in our amended report. Brent Hargrave's refund appeared in our Q1 2022 report. The Committee is in the process of rectifying Isaiah Wartman's contribution due to the fact that different addresses and employer and occupation were used.

Item #2 asked for a more detailed description and or missing information in the purpose of disbursement field. Additions are reflected in the amended report. The Committee used "campaign staff fees" for staff that were paid that were not on payroll but indeed 1099 employees. "Salary" was added to those descriptions. Any missing descriptions were an issue with the software as those listed were repayments on unpaid bills from the Q3 2021 report. I believe all now appear in the amended report.

Ashley Ragan
Treasurer
Blake Masters for Senate