

The information provided by analyst Bradley Austin accurately describes the circumstances in which the initial loan repayments were missed.

Within our campaign, we had a process by which bank statements were sent to a data entry associate at the end of each month, as that was when month end statements were received from the bank and forwarded for entry. The 12-day Pre-primary report was mid-month and in the fast-paced nature at that period of campaign activity, I approved what I saw, but did not think to look for what I did not see, and we submitted without catching the error. We had a good process for quarterly reporting but did not take into account that our process did not work for non-quarterly reporting until December, when I sat down and reviewed every line item from the entire campaign cycle to ensure it was accurate. As a first-time candidate, I created our reporting process without considering that there would be reporting periods that were not based on month end entries.

At the time we received notice in the form of RFAI that there were concerns about the error, we had already reported the loan repayments, as the next time at which we reported, month end had occurred and our reports were processed accordingly, as per our usual policy. Unfortunately, there was no way to go back in time, slow things down, and recognize our mistake in real time. However, I am confident in the transparency in which it was voluntarily brought to the FECs attention to ensure accuracy in the final reporting, prior to seeking termination of the committee, which is currently requested, without penalty.

We recognized that the loan repayments were not included in the pre-primary report and did what we believed to be the correct and appropriate thing in ensuring all our banking information was accurate and that all reports and paperwork were appropriately filed and amended.

While we had processes in place that we believed would ensure that no mistakes were made, we also relied on software to provide us confidence in that regard. We chose to use ISPolitical for our compliance software, which included what they call "Compliance A.I." On their website, they state, "ISPolitical's proprietary artificial intelligence analyzes FEC and other agency RFAI letters, delivering the most sophisticated compliance report warning system on the market." I had confidence that an error that would trigger an RFAI warning, such as the one received, would be caught by a system that advertised that type of warning system, however clearly it was not.

At all times I have been forthright and honest in reporting this data entry mistake and I proactively reported the error without prompt. I have continued to communicate with our campaign analyst to ensure full compliance and I request now that no penalty be incurred and that the campaign committee be allowed to dissolve.

Respectfully Submitted,



Spencer Toder