



Bruderyly for Congress
6th CONGRESSIONAL DISTRICT - FLORIDA
920 SW 57th Drive
Gainesville, FL 32607
Campaign Phone Number (352) 377-0932
www.bruderyly.com

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OFFICE OF GENERAL
COUNSEL

2006 APR 10 A 10: 02

March 31, 2006

Mr. Jeff S. Jordan
Supervisory Attorney
Office of General Counsel

MUR 5715

Dear Mr. Jordan:

This letter is in response to your letter dated March 17 2006 transmitting multiple complaints filed by Mr. George Shuman.

Since the beginning of my candidacy, Mr. Shuman has gone to great lengths to find fault with my filings. He has filed previous complaints against my campaign. He now continues to allege misconduct based on the same reporting errors and the fact that we filed several amended reports to correct reporting errors that your staff asked us to correct or that we have detected and corrected.

In addition, Mr. Shuman alleges that I improperly reimbursed myself for out of pocket campaign expenses that I incurred. The campaign has on file expense vouchers with receipts and records for every expense I and others have incurred and the associated reimbursements. As I understand the FEC rules we are not required to itemize those expenses, but to report them in general expense categories.

My campaign reports are completely transparent; we have reported every contribution and disbursement in accordance with FEC rules as well as many contributions and expenditures that were less than the \$200 threshold and we were not required to itemize. My philosophy is that when in doubt I report as much detail as is reasonable and possible.

However, the reason we have filed so many reports is that we made many bookkeeping and reporting errors during the 2004 campaign cycle. These errors were discovered by your staff and we filed amended reports to correct those errors. One of our problems was that we discovered our reported cash balance on the 2004 end of the year report to be wrong. By the time this error was discovered it had been compounded by the fact that the campaign stopped electronic filing using NGP software and I had shifted to paper reporting starting with the 1Q2005 report. This means that by the time we discovered the cash balance errors, my NGP files were no longer available to me. The amended reports that Mr. Shuman is concerned about were filed to correct minor reporting errors as well as the bookkeeping errors that yielded inaccurate cash balances.

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In 2005 I decided to reactivate the campaign for the 2006 election and we decided to avoid bookkeeping problems by subscribing to the NGP software; this time we also subscribed to the QuickBooks bookkeeping module. We filed our 2005 year-end report electronically using NGP and the QuickBooks software. During the process of uploading our past records, we attempted to correct the book keeping errors that were made during the 2004 campaign.

As we have learned how to use the NGP software, we have detected and corrected additional errors. We have spent many hours working very hard to detect and correct those mistakes.

It is our intention to file the 1Q06 report electronically using the NGP software. This report will be filed by mid-April 2006. We will submit amended reports electronically for the entire 2004 election cycle if your office feels it is necessary to clear up these allegations. Aside from the cash balance reporting errors, I believe Mr. Shuman's complaints are without merit. Please advise.

I would appreciate your advising Mr. Allan Silberman in your ADR Office that my campaign sent Mr. Peter Rebmann to your workshop in Savannah, Georgia in 2005 in compliance with the resolution of Mr. Shuman's previous complaint.

Sincerely,

David E. Bruderly, P.E.
Candidate, U.S. House of Representatives (FL 6)

Paid political advertisement paid for and approved by David Bruderly (D) for U.S. Congress from Florida's District 6.

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