

KAREN CARTER FOR CONGRESS

August 7, 2008

Lynn M. Fraser
Acting Director
Federal Election Commission
Alternative Dispute Resolution Office
999 E. Street N.W.
Washington, DC 20463

RE: ADR 463 (AR 08-13)
Karen Carter for Congress Committee and Ken Carter Treasurer

Dear Ms. Fraser:

Thank you for the opportunity to submit our matter to the Alternative Dispute Resolution Office of the Federal Election Commission.

The Karen Carter for Congress Committee was formed late, in August, 2006 to seek the office of U.S. Representative for the Second District of Louisiana. Karen Carter was seeking federal office for the first time. She enlisted people close to her to assist. I, as her father, volunteered to help with fundraising and immediately determined the necessity to solicit experienced help to assist in fundraising and complying with Federal Campaign Laws.

Having began so late in the year, we found that there was a dearth of expertise in post-Katrina New Orleans. The campaign hired Andrew Benton of Baton Rouge, Louisiana to coordinate and raise funds for the committee. He represented to us that he had experience in these matters. He recommended that we employ James Burland, CPA of Baton Rouge to file reports.

When reports were due, Mr. Burland was provided with the names, dates, addresses, amounts, dates of deposit, etc for the requisite reporting period. Mr. Burland filed all reports using FEC Software.

Later during the campaign the candidate was supported by "Emily's List" which required that the campaign use NGP software for filing reports. Subsequently, Michelle Wittman assumed the duties of verifying that the contributions were in compliance with FEC regulations,

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and the filing of reports.

At the end of the campaign Mr. Burland again assumed filing the reports. Unknown to us, Mr. Burland did not use NGP software and did not know how to integrate the FEC and NGP software. He went back to filing the reports using the FEC software. His data base was missing data that was filed using the NGP software. Therefore, it was necessary for us to rebuild our data base using the report already filed with the FEC. We did not understand the complexity and depth of the problem until the FEC audit commenced. Mr. Burland attempted to meet filing deadlines. However, the FEC/NGP software conflict created inaccuracies. We were perplexed. We relied on Emily's List experts and our CPA.

Subsequently and after the FEC process began, Ms. Walter, the candidate's personal assistant, secretary and bookkeeper, has worked with the FEC spending hundreds of hours trying to completely rebuild and reconstruct the data base.

We have reviewed the FEC audit findings of Failure to File Excessive Contribution Notices and Failure to File 48 Hour Contribution Notices. In regard to the 48 hour report, several contributions came through Emily's List. Those and many others were deposited within the 48 hour period. We were unable to ascertain when they were received. As novices, we failed to stamp each check when they were actually received by the campaign. We are trying to determine how much was received/deposited within the reporting period and was not timely reported. It was less than \$57,000. Therefore, the committee failed to timely report some contributions. However, the reports were not timely filed by our experts. We will be happy to discuss these matters with you.

I understand that it was ultimately my responsibility as Treasurer. I spent too much time on campaign managing and other duties rather than overseeing the experts. We tried to do too much, too fast and relied upon "experts". We did our best and ask for every consideration.

We are available for a conference call on the following days August 14, 15, 18, or 19 at 10:30 am Eastern or later.

Sincerely,

Kenneth M. Carter

KMC:ebw

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