

From: [davhbrill](#)
To: [CELA](#)
Subject: Re: MUR 7539
Date: Wednesday, December 12, 2018 8:22:20 PM

MUR 7539 - Response

Thank you for our conversation yesterday.

How did we get into this pickle? Ignorance. Had we known, we never would have done it, meaning using non-commercial aircraft. Unfortunately, in our campaign, we had three turnovers of "Finance Director", the last of which occurred just prior to this travel. None of our staff had experience with a Federal campaign. I had agreed with my campaign manager that I would "be the candidate", trusting the team and not constantly checking and second-guessing. The team, including the Campaign Manager, didn't check and didn't know that the FEC forbade the use of non-commercial aircraft by congressional candidates. If you wish, I can forward a relevant 11/23/18 email to that effect from my Campaign Manager, when I first received the FEC's complaint. My team thought we were OK with listing the travel as an in-kind donation at fair market value. We've of course taken no further steps in that direction since receiving the FEC complaint.

That said, I own and am fully accountable for the campaign. I stayed on as Treasurer not because I wanted to, but because we had turnover and I didn't want others to assume accountability until they were ready. That unfortunately never happened. It was a record year for Democratic candidates, with scarce affordable, available and experienced talent in Compliance.

The wife of our original accountant, who was to assume the role of Treasurer, That required a transition, with a subsequent failed attempt at Finance Director, before we finally developed a stable team in October. That said, I remained as Treasurer during those transitions. I normally could and would have checked on what the FEC regs were, but I had promised my team not to meddle and to trust them. I unfortunately kept that promise.

In part also due to the transition-induced disorder in our financial team, the campaign ended with substantial debt. Any FEC fine will be paid from my wife's and my personal finances, which are very stretched to say the least. We tapped everything we had, including my entire IRA and my wife's inheritance, for the campaign. I don't feel we should fundraise from others to pay for my mistakes. Those are my old-fashioned values. I would therefore hopefully need to enter into a payment plan for an FEC conciliatory agreement, which I can fulfill after I predictably start employment in January.

I have zero plans to run again, and would certainly never use non-commercial flights for a federal campaign if I did. That lesson is indelibly learned.

David Brill
Mobile