

MUR 6267

April 16, 2010

Mr. Jeff Jordan
Federal Election Commission
999 E Street NW
Washington DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
2010 APR 21 PM 2:33
OFFICE OF GENERAL
COUNSEL

Dear Mr. Jordan:

We are in receipt of your March 24, 2010 letter. We request that you dismiss the Arizona Democratic Party's partisan complaint against Jonathan Paton, because the matters raised by the Democratic Party were corrected in a timely fashion.

Jonathan Paton is a candidate for the United States House of Representatives for the Eighth District of Arizona. His federal principal campaign committee, Jonathan Paton for Congress ("federal campaign") filed its Form 1 Form 1 Statement of Organization with the Commission on January 26, 2010. *See* Attachment A (Form 1 dated January 20 and received by the Commission on January 26). Mr. Paton's Form 2 Statement of Candidacy was inadvertently filed late, but contrary to the Democratic Party's accusation, it is on file with the Commission. *See* Attachment B (Form 2). The campaign also timely filed its first Form 3 Report of Contributions and Disbursements on April 15, 2010. *See* Attachment C (Including Cover Page from April 2010 Quarterly Report).

Prior to becoming a federal candidate, Mr. Paton was a state senator in Arizona. In November and December, 2009, prior to the formation of the federal campaign, Mr. Paton's state campaign account paid for two expenses relevant to his state campaign and the testing the waters stage of a federal candidacy.¹ Once the federal committee was organized, it repaid the state campaign in full for the expenses on February 23, 2010. *See* Attachment C (Cover Page and Disbursement Page from April 2010 Quarterly Report).

In short, the minor errors raised in the Democratic Party's complaint were quickly corrected and will not be repeated. We ask that the Commission therefore dismiss this matter.

Sincerely,



Kevin Herring
Campaign Manager
Jonathan Paton for Congress

¹ Notably, Arizona's campaign finance limits are even stricter than federal rules provide. Both individuals and regular PACs are permitted to give a legislative candidate only \$410. *See e.g.*, http://www.azsos.gov/election/2010/Info/Campaign_Contribution_Limits_2010.htm (Arizona Secretary of State Contribution Limit Notice).

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FEC FORM 1

STATEMENT OF ORGANIZATION

FILING FEC-462801

1. Jonathan Paton for Congress

7400 N. Oracle Rd., Suite 125
Tucson, AZ 85704

NOTE: Address is different than previously reported

Email: info@patonforcongress.com

2. Date: 01/20/2010

3. FEC Committee ID #: C00474270

This committee is a Principal Campaign Committee. Candidate: Jonathan Paton
Party:

Office Sought: House of Representatives
State is Arizona in District: 08

Affiliated Committees/Organizations

Custodian of Records:

Jeffrey John Hill
4225 E. Grant Road #1
Tucson, AZ 85712
Title: Treasurer
Phone # (520) 795-4210

Treasurer:

Jeffrey John Hill
4225 E. Grant Road #1

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Tucson, Arizona 85712
Title: Treasurer
Phone # (520) 795-4210

Designated Agent(s):

Banks or Depositories

Bank of Tucson
PO Box 12766
Tucson, Arizona 85732

Signed: Jeffrey John Hill
Date Signed: 04/15/2010
Official Committee URL: www.patonforcongress.com

(End FEC FORM 1)



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**FEC FORM 2
STATEMENT OF CANDIDACY**

1. (a) Name of Candidate (in full)

Jonathan Paton

(b) Address (number and street)

7400 N. Oracle Rd., Suite 125

(c) City, State and ZIP Code

Tucson

AZ

85704-

☒ Check if address changed

2. Identification Number

3. Is This

Statement

☒ New
(N)

OR

☐ Amended
(A)

4. Party Affiliation

REPUBLICAN PARTY

5. Office Sought

House

6. State & District of Candidate

AZ 08

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

7. I hereby designate the following named political committee as my Principal Campaign Committee for the

2010 election(s)
(year of election)

NOTE: This designation should be filed with the appropriate office listed in the instructions.

(a) Name of Committee (in full)

Jonathan Paton for Congress

(b) Address (number and street)

7400 N Oracle Rd., Suite 125

(c) City, State and ZIP Code

Tucson

AZ

85704-

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

(Including Joint Fundraising Representatives)

8. I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my candidacy

NOTE: This designation should be filed with the principal campaign committee.

(a) Name of Committee (in full)

(b) Address (number and street)

(c) City, State and ZIP Code

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct, and complete.

Signature of Candidate

Jonathan Paton

Date

04/01/2010

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this Statement to penalties of 2 U.S.C. §437g.

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**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 161 / 184

☒ 17 ☐ 18 ☐ 19a ☐ 19b
☐ 20a ☐ 20b ☐ 20c ☐ 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)
Jonathan Paton for Congress

A.

Full Name (Last, First, Middle Initial)
I Contribute

Transaction ID: 00328.E102
Date of Disbursement

Mailing Address PO Box 8522

03 / 02 / 2010

City Falls Church State VA Zip Code 22041-

Amount of Each Disbursement this Period

334.74

Purpose of Disbursement
Processing Fees
Candidate Name

Category/
Type

Office Sought: House Senate President
State: District:

Disbursement For:
Primary General
Other (specify) ▼

PROCESSING FEES

B.

Full Name (Last, First, Middle Initial)
Paton 4 Senate

Transaction ID: 00314.E83
Date of Disbursement

Mailing Address 9432 E. 5th Street

02 / 23 / 2010

City Tucson State AZ Zip Code 85710-

Amount of Each Disbursement this Period

7566.43

Purpose of Disbursement
Polling & Research
Candidate Name

Category/
Type

Office Sought: House Senate President
State: District:

Disbursement For:
Primary General
Other (specify) ▼

POLLING & RESEARCH

C.

Full Name (Last, First, Middle Initial)
Strategic Media Solutions

Transaction ID: 00314.E86
Date of Disbursement

Mailing Address PO Box 15991

03 / 04 / 2010

City Newport Beach State CA Zip Code 92659-

Amount of Each Disbursement this Period

4692.79

Purpose of Disbursement
Postage & Printing
Candidate Name

Category/
Type

Office Sought: House Senate President
State: District:

Disbursement For:
Primary General
Other (specify) ▼

POSTAGE & PRINTING

SUBTOTAL of Disbursements This Page (optional)

12503.96

TOTAL This Period (last page this line number only)

FESAN018

FEC Schedule B (Form 3) (Revised 02/2008)