

October 7, 2011

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Jeff S. Jordan
Supervisory Attorney
Complaints Examination &
Legal Administration
Federal Election Commission
Washington, D.C. 20463

Reference: P-MUR 526

Dear Mr. Jordan:

Pursuant to your correspondence dated September 7, 2011, I submit the following information:

During the last one to two years of working for the Geoff Davis for Congress Campaign I was less than diligent in discharging my duties on behalf of the campaign. I was completely consumed in my work for my current employer and closing manufacturing plants and transferring work to my plant while downsizing my own staff and taking on more than my fair share of responsibilities. I am the Operations Controller for several plants and I helped close 4 manufacturing operations in 2009 and 2010. I am also the Import/Export Officer and the Network Systems Administrator for our business group. I traveled extensively during that period of time and spent very little time on my campaign duties.


In hindsight I should have left the Campaign in early 2009 when my job became overly demanding and I could not devote enough time to Campaign matters. I was never formally trained to be a Campaign Treasurer but I learned mostly by researching issues when I came across one. I implemented as many controls as I could when I encountered issues. As you can imagine I have much higher spending authority in my current job but I also have staff to match paperwork and enter invoices/receipts into our accounting system. When I worked for the campaign, I had to enter almost everything myself. In the end, I had help but I was too engrossed in my job to focus on my campaign duties.

I want to assure you that I never intentionally misappropriated funds from this campaign. I was a very sloppy bookkeeper in the first months of my tenure but my intentions were never malicious.

I regret those days and I used to blame it on my work and stress but it was really my own failure to deal with a stressful job and home life. Please do not take this admission as an excuse for my actions. I only want to attest to my mind set during the last few years as the Campaign Treasurer.

I deeply regret any pain that I have caused Geoff Davis or the Campaign. Geoff is a true patriot and a brother in arms. I failed him as a friend, a fellow Army paratrooper, and accountant. I don't remember the details of the withdraws but please forward the enclosed check to the Campaign for restitution. I humbly and sincerely apologize for my actions.

Sincerely,


Joe L. Gurn

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