

September 11, 2018

Dear Mr. Jordan and Ms. Dennis:

I write in response to your letter dated May 16, 2018 re: MUR 7383 under the extension afforded by Ms. Dennis for our committee. I'm Treasurer of the Hughes for Congress committee ("the Committee") and have served as a professional FEC treasurer on several committees. I was engaged by the Hughes campaign as one step among many to professionalize an otherwise volunteer operation.

FEC compliance is of prime importance to the Hughes for Congress committee. The Committee has discussed this matter with attorneys who specialize in matters before the FEC and at this time, for reasons laid out below, we are proceeding without presently engaging one, reserving our right to retain one at a later time.

This complaint was submitted by disgruntled former staff who left the campaign abruptly, prior to the Q1 filing deadline. Mr. Hughes is a novice politically with good intentions who would never knowingly do anything improper.

The abrupt departure left Mr. Hughes alone to timely file what he had been told was a report current as of their departure. As soon as any errors were noticed, and prior to becoming aware of this complaint, the Q1 report was immediately amended by Mr. Hughes. Any clerical errors which remained were subsequently amended by me.

Since being engaged, I have fully reconciled the accounts, performed an internal audit, and amended any prior reports in this cycle where clerical errors may have existed. These professional assessments fully corroborate the committee's position that the complaint is baseless. The campaign has transferred checks to me, set up a quickbooks account through which transactions can be expeditiously monitored, designated, and tracked, instituted dual-signer procedures, and other best practices.

It is the committee's position that the other claims in the complaint (and the subsequent "information" filed by the complainant) are equally baseless, and at no time did Mr. Hughes or his committee act in a malicious manner as the complainant implies, nor in any way knowingly contrary to the regulations set forth under the Act. Any oversight or improper filing arose simply from the lack of professional assistance. For the past several months, Mr. Hughes has been surrounded by a professional team, and we do not anticipate any errors in the future which should require the attention of the Commission.

It is the committee's position that this complaint was drafted not with the FEC as the primary audience, but rather with the intent for it to be used to damage the candidate. The existence and content of the complaint was made known to the committee via social media prior to our receipt of the Commission's notice via Mail. The complaint was even distributed by the complainant at campaign events, showing the political motives behind this compliant.

It is unfortunate that the complainant has chosen such a vindictive path, filing a complaint that draws false conclusions, for which we must now waste our time, and the resources of the Commission, in addressing.

The Hughes for Congress committee is extremely grateful for the opportunity afforded by the Act to "demonstrate in writing that no action should be taken against [it] in this matter." To be clear, we believe that the

resolution of this matter should be no action against Hughes for Congress. If, beyond this response, any further detail is required or requested to demonstrate our position, we are happy to provide to the Commission such information.

The committee is happy to be fully forthcoming, cooperative, responsive, and transparent with the FEC in anything you may further request.

Sincerely,

Travis Kabrick
Treasurer, Hughes For Congress