

US CONGRESS  
OFFICE OF  
GENERAL COUNSEL  
**AMANDA ADKINS**  
2020 FEB 28 PM 1:49  
**Builder. Believer.**

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GENERAL COUNSEL

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MUR 7689

February 25, 2020

Federal Election Commission  
Office of Complaints Examination & Legal Administration  
Attn: Kathryn Ross, Paralegal  
1050 First St NE  
Washington, DC 20463

To whom it may concern:

I am writing in my capacity as treasurer of Amanda Adkins for Congress to provide additional facts and a response to an alleged violation against Ms. Adkins, her campaign committee, and myself as treasurer.

First, exploratory campaign funds are permitted to be used in a myriad of ways outside of simply polling as Mr. Losey suggests in his complaint. These purposes would include hiring fundraisers to pay for the costs of polling, traveling in-district, and reaching out to potential voters to gauge interest. This would also include hiring political strategists to help interpret poll results and advise on strategy for different voter groups and geographic areas of the district. This is exactly how funds were used by this entity.

Second, FEC guidelines state an exploratory committee that solicits funds while testing the waters need not register with the Federal Election Commission until it begins to act as a candidate committee. This committee was careful to never cross the line and enter campaign mode while testing the waters. We refrained from phrases like "running for congress" and our materials were consistent in that as well.

Third, the exploratory committee did not hold onto checks as alleged in the complaint. The exploratory committee deposited all checks upon receipt into its' own bank account. Contrary to the allegations by Mr. Losey, one does not need to be registered with the FEC in order to open a bank account for an exploratory committee.

If you have any furthers questions in regards to this matter I'd be glad to provide additional information in order to resolve this matter swiftly, you may reach out to me via e-mail at [rp3@henryalan.com](mailto:rp3@henryalan.com) or via U.S. mail at PO Box 3653, Dublin, OH 43016 should you like to request any additional information.

Sincerely,

Robert Phillips III, Treasurer  
Amanda Adkins for Congress

Subscribed to and sworn before my on this twenty-fifth day of February 2020

Ashley Klein, Notary

