

Matt Innis for U.S. Senate, Inc.  
 3434 O St  
 Lincoln, NE 68510

March 13, 2020

Federal Election Commission  
 Office of Complaints Examination and Legal Administration  
 Attn: Christal Dennis, Paralegal  
 1050 First St NE  
 Washington, DC 20463

Dear Ms. Dennis,

The Matt Innis for U.S. Senate, Inc. committee (FEC ID C00716977) is in receipt of MUR 7711 containing a complaint from Ms. Teresa Thibodeau alleging that the committee failed to "comply with basic disclosure requirements mandated by the Federal Election Campaign Act of 1971, as amended".

The complaint goes on to specifically state that disbursements made to Facebook were not disclosed on the Committee's reports and that disbursement descriptions did not reflect any payments related to digital advertising.

The Matt Innis for U.S. Senate, Inc. committee's response follows:

All transactional data including all paid disbursements have been reconciled with banking and check activity and have been disclosed properly on the committee's filed reports in full accord with 11 CFR 102.9(b). The resulting beginning and ending balances disclosed on the committee's reports accurately disclose the committee's cash on hand relative to the applicable report coverage dates.

Disbursements reported on Schedule B of the committee's submitted FEC reports that were made to the independent contractor *Transformation Marketing* reflect payments made for the design and printing charges of tangible campaign promotional materials and administrative supplies. (i.e. signs, banners, stickers, magnets, envelopes, letterhead, business cards, etc.) As such, these payments were correctly described as "Printing" on the committee's submitted reports and disclosed in full accord with 11 CFR 104.9(a) & (b) and 11 CFR 104.3.

The vendor, *Transformation Marketing*, has billed the committee for additional services that the committee has not yet paid. As is required by 11 CFR 104.3(d) and 11 CFR 104.11, these outstanding invoices to *Transformation Marketing*, were properly disclosed on Schedule D of the committee's Year End report, and totaled \$24,381.16. These invoices include charges for multiple types of services of varying descriptions including printing, graphic design, web services, non-digital and digital media including Facebook ads. During the course of the ongoing campaign, the committee has and continues to utilize the services of the vendor and to make payments to the vendor on current and outstanding invoices in a fair-market & commercially reasonable manner. Inasmuch as the committee can find no regulatory guidance requiring it to disclose "ultimate vendor" information for these types of expenses on its public financial reports, proper descriptions for future partial payments toward the outstanding

balance will be disclosed on the applicable FEC disclosure report schedules (B & D) as they are paid in accord with the applicable regulations.

The committee used a description of "printing" for the outstanding invoices total on Schedule D for the Year End 2019 report. In the case where an invoice is billed for multiple types of expenses, descriptors used are normally disclosed and ordered by greatest portion of the expense to smallest portion of the expense. The amount specified in the complaint of \$457 for Facebook ads calculates to approximately 1.87 % of the total of these outstanding invoices. Since the digital media ad expense is such a small portion of the outstanding total, and due to character limits in the FEC filing software for descriptions, not all applicable descriptors may appear on Schedule D for this item. However, I am happy to amend the debt schedule description entry in any manner that the FEC deems appropriate.

There has been no "obfuscation of campaign spending" as the complaint alleges, and therefore no action should be taken against Matt Innis for U.S. Senate, Inc. or myself in my official capacity as Treasurer.

I look forward to resolving this complaint and appreciate your time and diligence in this matter.

Thank you,



Scott Rediger  
Treasurer, Matt Innis for U.S. Senate, Inc.