

Digitally
signed by
Christal
Dennis
Date:
2018.09.24
08:47:43
-04'00'



September 20, 2018

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

RE: RR 18L-29

To Whom It May Concern,

In response to your letter dated August 20, 2018, we appreciate the opportunity to demonstrate that we believe no action should be taken against me in my official capacity as treasurer or the Adam Kokesh Referendum Project .

In my phone conversation of Jun 20th, I was advised to call Jeff Jordan, which I promptly did.

In early June, the campaign sought to hire an independent auditor. Dan Wholihan, Esq. (PO Box 1182, Brighton, MI 48116) sent a request for bank statements and all other financial records via certified mail to Mr. Owens. The letter was never retrieved and was returned after several delivery attempts. In that time period, Mr. Owens moved. His current address is 676 22nd St #24, Boulder CO 80302.

We are not sure all the highlighted items were indeed violations. For example, items listed as "Undocumented Expenses" were known to the candidate and thus likely valid campaign expenditures, but as the former Treasurer will not produce any records, I cannot document them in a manner that would pass even a rudimentary audit. Items notated as "Unauthorized Expenses" were primarily expense reimbursements and salary expenditures that were known to the campaign, but paid by someone technically not authorized to spend funds. If we can retrieve the official records, it is very likely that a significant majority of the transactions will be determined to be valid.

In a similar manner, the excessive contributions resulting from the former Treasurer "loaning" personal funds to the campaign would have already been refunded by the Campaign if we could properly document them. However, the loans were made without the knowledge or approval of the Candidate or the Campaign. These actions were entirely the result of a rogue Treasurer.

The only issues which may be justifiably actionable are the 31 contributions with missing donor information. I was not the Treasurer when the possible violations occurred, and I fulfilled my duties by filing accurately to the best of my abilities with the documentation available to me. Therefore, no actions should be taken against me personally. Prior to my tenure, the Candidate and the Campaign reacted to that situation by terminating the former Treasurer immediately. While the campaign may be required to forfeit those amounts, no penalties should be levied against the Campaign.

I assert that any penalties should be levied upon Ethan Owens, who was the Treasurer of record at the time and was therefore directly responsible for the malfeasance.

As you are considering your options, please consider that the Campaign implemented procedures to strengthen the internal controls. Specifically, the bank accounts are no longer in the name of an

individual. Bank reconciliations and check receipts are delegated to an individual with no other access to financial systems. All expenditures are authorized by someone other than myself, and expenditures over \$1,000 are approved by 2 principals.

In conclusion, the Campaign has acted promptly to rectify all irregularities, but without the cooperation of the former Treasurer, we are at an impasse. Therefore, we believe that if it necessary to take action, then such action should be initiated against the former Treasurer and not the Campaign.

Sincerely,

Angela Thornton

Angela Thornton
Treasurer

Adam Kokesh American Referendum Project
15223 Ripple Dr
Linden MI 48451