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By OGC-CELA at 9:50 am, Jun 21, 2022

Steven J. Stelman, Treasurer
Stephen Houlahan for Congress
FEC ID C00764027
PO Box 710175
Santee, CA 92072

This is in response to the complaint filed with the Federal Election Commission numbered Matter Under Review (MUR) 8005.

Firstly, it must be stated that any violations of Federal Election Commission rules and regulations were entirely accidental and the result of committee volunteers being unaware of FEC guidelines. No actions were taken with the intent of deliberately ignoring federal law and a good faith effort has been made by the committee to correct any errors after being made aware of these errors.

With that being made clear, it must be acknowledged by the committee that there were unintentional mistakes made by the campaign. Since the committee had been issued MUR 8005, the campaign has made a best effort attempt at correcting all issues outlined in the complaint and has put procedures in place to prevent these unintentional errors in the future.

Both the committee's Linktree, linktr.ee/ElectHoulahan and official campaign website, ElectHoulahan.com, have been updated to include correct disclaimers, as shown in the attached screenshots, Exhibit A (Linktree Disclaimer) and Exhibit B (Website Disclaimer). Additionally, the committee has removed and recalled all possible campaign authorized posters and yard signs and plans to add a 11.5 x 1 inch sticker to these recalled signs and all publicly displayed campaign signage moving forward. The design of this sticker, reading "Paid for by Stephen Houlahan for Congress" inside of a text box, is shown in the attached screenshot, Exhibit C (Sticker Design). These stickers were purchased by myself as an in-kind donation to the Committee on June 17, 2022, as shown on the attached screenshot, Exhibit D (Sticker Invoice). No recalled campaign signage will be distributed until the disclaimer stickers are applied. All appropriate campaign materials requiring a disclaimer will have one printed on it from this point of the campaign forward.

Regarding the FEC Forms 1 and 2, this was due to an oversight on the committee's behalf. Both FEC Form 1 and FEC Form 2 have been amended as of June 18, 2022 to include California Congressional District 48 to more accurately reflect the public record. All reports filed with the Commission will list Congressional District 48 as the correct district from now on.

Finally, the accusations outlined on page three of the complaint are simply false. To the best knowledge of the Committee, every Report of Receipt and Disbursements filed by the committee has been accurate and reconcile against the committee's bank account. The GoFundMe listed in the complaint was disconnected to the Congressional campaign and continues to have no association with the committee to this day. None of the funds raised by the GoFundMe have ever been received by the committee nor has their use been otherwise directed by the committee. That the committee has received the majority of its donations from small-dollar, grassroots donors who give less than an aggregate of \$200.00 is not a legal issue. Even removing that from consideration, the claim that the campaign has only received itemized funds from ActBlue is simply incorrect. The campaign received and reported non-earmarked contributions directly from donors in multiple instances, including but not

limited to Robert Billburg on July 10, 2021, Therese Somerville on July 25, 2021, Victoria Call on December 7, 2021 and Chris Martinez on July 10, 2021 and September 30, 2021. Also, funds received by the committee from Stephen Houlahan for Santee Mayor 2020 were correctly reported on the Year-End 2020 Report. The \$972.55 contribution, as noted on the Year-End 2020 Report, was made up entirely of permissible funds, in this instance donations from individuals, to that non-connected committee.

In order to ensure proper adherence to all FEC regulations moving forward, the campaign has agreed to retain compliance consulting firm Roger That Compliance, LLC. Roger That Compliance, LLC's President, Mr. Blair Schuman, was previously volunteering with the Committee in his personal capacity to assist with the filing of the committee's FEC Reports of Receipts and Disbursements. With the retention of Roger That Compliance, LLC all campaign materials will be reviewed by compliance professionals prior to their introduction to the general public.

Thank you for your consideration. If the commission has any additional requests for information, please contact the committee as soon as possible.

Sincerely,

Steven J. Stelman, Treasurer

Stephen Houlahan for Congress


6/18/2022



Stephen Houlahan for Congress

Support my grassroots campaign to take back #CA48

[Donate to unseat Darrell Issa!](#)

[Continue to campaign website](#)

[Register to vote!](#)

[COVID-19 Vaccine Registration](#)

[Paid for by Stephen Houlahan for Congress](#)





I was raised right here in the district, in the town of Santee, where I live with my wife and son. I have served my whole life, whether as a nurse, a little league coach, or as a city council member. With your support, I will beat Darrell Issa and serve California's 48th district in Congress.

[**MY PRIORITIES**](#)[**DONATE**](#)

Stephen Houlahan for Congress. PO Box 710175, Santee CA 92072

[**MEET STEPHEN**](#) [**ON THE ISSUES**](#) [**JOIN THE TEAM**](#) [**CONTACT US**](#)

Paid for by Stephen Houllahan for Congress



Receipt June 17, 2022

R685003385

Billing address

Steven Stelman

Santee
CA 92071
United States

Shipping address

Stephen Houlahan

Santee
CA 92071
United States
Stephen Houlahan for Congress

Item**Quantity****Cost**

<input type="checkbox"/>	Custom 11.5" x 1" Bumper stickers	150	\$116
<input type="checkbox"/>	Mule sauce	1	\$0

Prices may change based on updates made during proofing.

This is a provisional invoice for an order that's still pending approval.

Subtotal	\$116
Shipping	\$0
Sales tax	\$8.99
Order total	\$124.99
Authorized amount	\$124.99
Captured amount	\$0

Sticker Mule, LLC

336 Forest Ave, Amsterdam, NY 12010

stickermule.com