

**RECEIVED**  
By OGC-CELA at 5:34 pm, Dec 07, 2021



INTERNATIONAL SQUARE  
1825 EYE STREET, NW, SUITE 900  
WASHINGTON, DC 20006-5468  
TELEPHONE: 202-457-0160  
FACSIMILE: 844-670-6009  
<http://www.dickinsonwright.com>

KATHERINE N. REYNOLDS  
[KReynolds@dickinsonwright.com](mailto:KReynolds@dickinsonwright.com)  
202-659-6944

December 7, 2021

Federal Election Commission  
Office of Complaint Examination  
& Legal Administration  
Attn: Roy Q. Luckett  
1050 First Street NE  
Washington, DC 20463

VIA EMAIL: [cela@fec.gov](mailto:cela@fec.gov)

**Re: RR 21L-66 Response for Dan Crenshaw for Congress**

We represent Dan Crenshaw for Congress in this matter. This matter involves a series of excessive contributions that were either refunded late or have not yet been refunded. Dan Crenshaw has refunded all excessive contributions as of the date of this response, which will be reflected on Dan Crenshaw for Congress' year-end report. The delayed refunds were a result of human error. Dan Crenshaw for Congress has now implemented internal compliance measures to ensure that this does not happen again, and all refunds are made within sixty days of receipt.

While we believe this is a one-time mistake by the Committee which does not warrant use of Commission resources, in the event that the Commission does decide to pursue enforcement against Dan Crenshaw for Congress, we request that this matter be resolved with additional compliance training and procedures agreed to through the Alternative Dispute Resolution (ADR) process.

We hope this satisfies the Commission's request. Should you have any questions, please email me at [kreynolds@dickinson-wright.com](mailto:kreynolds@dickinson-wright.com) or call me at 202-659-6944.

Sincerely,

Katherine N. Reynolds  
*Counsel for Dan Crenshaw for Congress*