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By Office of the Commission Secretary at 3:20 pm, Jul 27, 2017



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

July 27, 2017

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson *LJS*
Acting General Counsel

Lorenzo Holloway *LH*
Assistant General Counsel
Compliance Advice

Margaret J. Forman *MJF*
Attorney

SUBJECT: Debt Settlement Plan #15-04
Corbett for Congress (C00502088)

I. CORBETT FOR CONGRESS REQUESTS COMMISSION APPROVAL OF DEBT SETTLEMENT PLAN

Corbett for Congress (“Committee”) seeks the Commission’s approval of its debt settlement plan (“DSP” or “plan”). The Committee owes \$58,000 to two creditors, both of whom are campaign consultants. *See* Attachment 1. The Committee, which has \$8,675.13 cash on hand, proposes to pay \$8,119.19 to one of the creditors, and proposes to settle the debt to the other creditor with 100% forgiveness of the outstanding debt. *Id.*

II. THE COMMISSION SHOULD APPROVE THE DEBT SETTLEMENT PLAN

The Office of General Counsel has reviewed the plan, and we recommend that the Commission approve it. We present the reasoning in support of our recommendation below.

The Commission reviews debt settlement plans to ensure that neither excessive nor prohibited contributions result from the creation and settlement of the committee’s debts. *See Debts Owed By Candidates and Political Committees*, 55 Fed. Reg. 26,378-26,385 (Jun. 27, 1990). The Commission considers six factors in evaluating debt settlement plans: (1) information provided by the Committee and its creditors; (2) the amount of each debt that

remains unpaid and the length of time each debt has been overdue; (3) the amount and percentage of each debt that would be forgiven under the plan; (4) the total amount of debts and obligations owed by the terminating committee to all creditors, compared to the total amount of cash on hand and other amounts available to pay those debts and obligations; (5) the year-to-date expenditures and receipts of the terminating committee; and (6) whether the total percentage that was or will be repaid on any loans made by the candidate to the terminating committee is comparable to the total percentage that was or will be paid to other creditors.
11 C.F.R. § 116.7(f)(1)-(6).

The Committee submitted information that supports its debt settlement plan.¹
11 C.F.R. § 116.7(f)(1). The Committee's plan is summarized in the following chart, which identifies the two creditors listed in Part II of the plan, itemizes the amounts owed, the amounts proposed to be paid, the amounts proposed to be forgiven and the percentage of the amounts proposed to be forgiven:

Creditor	Amount Owed	Amount to be Paid	Amount to be Forgiven	Percentage to be Forgiven
SG&A Campaigns, Inc. ²	\$40,000	0	\$40,000	100% ³
The California Group ⁴	\$18,000	\$8,119.19	\$9,880.81	55%
Totals	\$58,000	\$8,119.19	\$49,880.81	86%

¹ When the Committee submitted the amended plan in July, 2015, it lacked signatures from the treasurer and the two creditors. The Committee submitted signatures from the treasurer and one of the creditors in September 2015, but was apparently unable to submit the signature from the second creditor until June, 2017. *See* Attachment 3.

² The Committee made a \$10,000 payment to SG&A on October 20, 2014, reducing the amount owed from \$50,000 to \$40,000. The Committee filed a DSP on May 19, 2015, and an amended plan in response to a RFAI from RAD on July 13, 2015. The amended DSP corrects the report to reflect a change from \$68,000 to \$58,000 in outstanding debts, and removes a \$10,000 payment to SG&A Campaigns, Inc. in October, 2014 as part of the settlement. The Committee, however, indicates that this \$10,000 payment was "a good faith effort ... to pay part of the total amount owed to SG&A before the [C]ommittee concluded it would not be able to raise additional funds to extinguish the debt." *See* Attachment 2. The Committee confirmed by email on September 2, 2015 that that the terms of the settlement with SG&A were for 100% forgiveness of the \$40,000 debt. The \$10,000 payment was made prior to the point at which the Committee determined that it would file a DSP. *See* Attachment 2.

³ The Commission has previously approved debt settlement plans where committees proposed 100% debt forgiveness with some, or all, of the creditors. *See* Friends of Mark Neumann, DSP 17-02 (Commission approved 100% debt forgiveness for four creditors (out of five total creditors) ranging in amounts from \$22,480.72 to \$122,281.62; Donovan for Congress, DSP 16-02 (Commission approved 100% debt forgiveness for one creditor (out of five total creditors) in the amount of \$21,000); David Davis Victory Fund, DSP 16-01 (Commission approved 100% debt forgiveness for two creditors (out of three total creditors) in the amounts of \$28,007.56 and \$38,747.33).

⁴ The Committee previously paid this vendor a total of \$33,000 for fundraising services from October 21, 2013 through February 26, 2014. 11 C.F.R. § 116.7(f)(3).

The Committee's debts to these two creditors, both of which are campaign consultants, have been due for approximately three years. *See* Attachment. 11 C.F.R. § 116.7(f)(2). The Committee, which has \$58,000 in outstanding debts and \$8,675.13 cash on hand, indicates that it does not have sufficient funds to pay all of the debt, due to inability to raise enough funds, and because the candidate no longer holds elective office. Ms. Corbett has not been a candidate for election to federal office since June of 2014, when she lost the primary election. 11 C.F.R. § 116.7(f)(4). The Committee has reported disbursements from operating expenses to its law firm for legal and reporting services while it winds down its committee, though not since June 15, 2015. *See* Corbett for Congress, July Quarterly Report, FEC form 3, at 5 (Jul. 15, 2015) and April Quarterly Report, FEC form 3, at 5 (Apr. 14, 2015) (for disbursements to law firm). Other than these disbursements, the Committee has not reported any financial activity since its October 2014 payment of \$10,000 to SG&A Campaigns, Inc. 11 C.F.R. § 116.7(f)(5). The Committee does not owe any repayments of candidate loans. 11 C.F.R. 116.7(f)(6).

If the Committee pays the California Group the settlement amount of \$8,119.19, the Committee will have \$555.94 in remaining funds. The Committee proposes to use these funds to pay for legal services, compliance and disclosure expenses until its reporting obligation is terminated. *Id.* Nothing in the debt settlement regulations creates a priority between paying a current invoice for goods and services and paying outstanding debts. In fact, the debt settlement regulations specifically recognize that a committee may, as part of winding down its political activities, make disbursements for compliance and disclosure expenses until it terminates. 11 C.F.R. § 116.1(a). We, therefore, believe that the Committee may use its remaining cash on hand in this manner. The Commission has approved other debt settlement plans with similar uses of remaining cash on hand. *See e.g.*, DSP 15-03 (Shannon for Senate).

None of the six factors used in evaluating this plan nor the Committee's proposed use of the remaining funds suggest that the debt settlement plan would result in an excessive contribution to the Committee. 11 C.F.R. § 116.7(f); *see Debts Owed By Candidates and Political Committees*, 55 Fed. Reg. 26,378-26,385 (Jun. 27, 1990). We, therefore, recommend that the Commission approve the debt settlement plan.

III. RECOMMENDATIONS

1. Approve the debt settlement plan filed by Corbett for Congress;
2. Approve the appropriate letter; and
3. Close the file.

Attachments:

1. Memorandum to Lisa J. Stevenson and Lorenzo Holloway, Referral of Corbett for Congress – Debt Settlement Plan, dated August 5, 2015.
2. Email from Emily Andrews to Margaret J. Forman, dated September 2, 2015.
3. Email from Emily Andrews to Margaret J. Forman, dated June 19, 2017.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 5, 2015

MEMORANDUM

TO: Lisa J. Stevenson
Deputy – General Counsel

Lorenzo Holloway
Assistant General Counsel

THROUGH: Alec Palmer
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: *KR* *KR to CR*
Kristin Roser/Chris Ritchie
Reports Analysis Division

SUBJECT: Referral of Corbett For Congress – Debt Settlement Plan

Attached is a debt settlement plan (DSP) originally filed by Corbett For Congress (C00502088) on May 19, 2015.

The total amount of debt owed by the Committee, as disclosed in the 2015 July Quarterly Report, filed on July 15, 2015, is \$58,000.00. According to the 2015-2016 *RAD Review and Referral Procedures for Authorized Committees (Standard 19)*, all DSPs seeking to settle debts greater than \$50,000.00 require further examination by your office.

All the information provided by the Committee within the DSP has been reviewed for accuracy. If you have any questions regarding this referral, please contact Chris Ritchie at 694-1146.

Attachments

O-Index (2015-2016)															
Cmte. ID: C00502088 Cmte. Name: CORBETT FOR CONGRESS															
Treasurer Name: ELLEN CORBETT Address: 555 CAPITOL MALL SUITE 1425, SACRAMENTO, CA 95814															
Cmte. Type: H (HOUSE) Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-B			5/27/2015	1	15330083269				-	-	-	-	-	-	-
MS-C			6/7/2015	2	15330083567				-	-	-	-	-	-	-
MS-T			7/13/2015	1	201507139000098995				-	-	-	-	-	-	-
F3N	Q1	N	4/14/2015	7	15951142347	1/1/2015	3/31/2015		\$10,371	\$0	\$719	\$9,651	\$58,000	-	\$58,000
F3N	Q2	N	7/15/2015	7	201507159000185056	4/1/2015	6/30/2015		\$9,651	\$0	\$976	\$8,675	\$58,000	-	\$58,000
F8		N	5/19/2015	7	15031430147				-	-	-	-	-	-	-
F8		N	7/13/2015	7	201507170300010043				-	-	-	-	-	-	-
Totals										\$0	\$1,696				

O-Index (2013-2014)															
Cmte. ID: C00502088 Cmte. Name: CORBETT FOR CONGRESS															
Treasurer Name: ELLEN CORBETT Address: 555 CAPITOL MALL SUITE 1425, SACRAMENTO, CA 95814															
Cmte. Type: H (HOUSE) Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			10/6/2014	1	14978064823				-	-	-	-	-	-	-
MS-T			10/6/2014	1	14978065090				-	-	-	-	-	-	-
RQ2	12P	A	9/1/2014	2	14330060315	4/1/2014	5/14/2014	9/1/2014	-	-	-	-	-	-	-
RQ2	Q2	N	9/1/2014	2	14330060317	5/15/2014	6/30/2014	9/1/2014	-	-	-	-	-	-	-
F3N	Q1	N	4/15/2013	14	13940552443	1/1/2013	3/31/2013		\$104,193	\$16,201	\$5,430	\$114,963	-	-	\$0
F3N	Q2	N	7/15/2013	21	13941146419	4/1/2013	6/30/2013		\$114,963	\$12,000	\$11,190	\$115,772	-	-	\$0
F3A	Q2	A	10/15/2013	26	13941821444	4/1/2013	6/30/2013		\$114,963	\$12,429	\$11,207	\$116,184	-	-	\$0
F3N	Q3	N	10/15/2013	30	13941821470	7/1/2013	9/30/2013		\$116,184	\$36,502	\$9,268	\$143,417	-	-	\$0
F3N	YE	N	1/31/2014	112	14940307538	10/1/2013	12/31/2013		\$143,417	\$91,132	\$25,891	\$208,658	-	-	\$0
F3N	Q1	N	4/15/2014	65	14960771494	1/1/2014	3/31/2014		\$208,658	\$34,007	\$34,660	\$208,005	\$6,000	-	\$6,000
F3N	12P	N	5/22/2014	45	14961203730	4/1/2014	5/14/2014		\$208,005	\$21,656	\$113,628	\$116,032	\$18,000	-	\$18,000
F3A	12P	A	7/15/2014	48	14941827833	4/1/2014	5/14/2014		\$208,005	\$21,656	\$113,628	\$116,032	\$33,363	-	\$33,363
F3N	Q2	N	7/15/2014	42	14941827054	5/15/2014	6/30/2014		\$116,032	\$12,970	\$37,859	\$91,143	\$97,132	-	\$97,132
F3N	Q3	N	10/15/2014	20	14978354117	7/1/2014	9/30/2014		\$91,143	\$283	\$70,244	\$21,182	\$68,000	-	\$68,000
F3N	YE	N	1/30/2015	8	15950524932	10/1/2014	12/31/2014		\$21,182	\$0	\$10,811	\$10,371	\$58,000	-	\$58,000
F3A	YE	A	4/14/2015	11	15970344028	10/1/2014	12/31/2014		\$21,182	\$0	\$10,811	\$10,371	\$58,000	-	\$58,000
F6N			5/26/2014	1	14961228284				-	-	-	-	-	-	-
F6N			5/29/2014	1	14961232024				-	-	-	-	-	-	-
F2A		A	4/15/2013	1	13940552565				-	-	-	-	-	-	-
Totals										\$225,182	\$319,004				

O-Index (2011-2012)															
Cmte. ID: C00502088 Cmte. Name: CORBETT FOR CONGRESS															
Treasurer Name: ELLEN CORBETT Address: 555 CAPITOL MALL SUITE 1425, SACRAMENTO, CA 95814															
Cmte. Type: H (HOUSE) Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			10/19/2011	1	11971728442				-	-	-	-	-	-	-
F3N	Q3	N	10/14/2011	5	11952627590	7/1/2011	9/30/2011		\$0	\$89	\$89	\$0	\$2,320	-	\$2,320
F3A	Q3	A	1/31/2012	6	12970289559	7/1/2011	9/30/2011		\$0	\$89	\$89	\$0	\$2,320	-	\$2,320

F3N	YE	N	1/31/2012	163	12970285819	10/1/2011	12/31/2011	\$0	\$161,835	\$14,116	\$147,718	\$22,714	-	\$22,714
F3A	YE	A	10/15/2012	165	12954408457	10/1/2011	12/31/2011	\$0	\$161,835	\$14,116	\$147,718	\$22,714	-	\$22,714
F3A	YE	A	7/16/2013	95	13941156889	10/1/2011	12/31/2011	\$0	\$161,835	\$14,116	\$147,718	\$22,714	-	\$22,714
F3N	Q1	N	4/13/2012	34	12951392029	1/1/2012	3/31/2012	\$147,718	\$7,815	\$51,585	\$103,947	\$0	-	\$0
F3A	Q1	A	7/16/2013	29	13941157276	1/1/2012	3/31/2012	\$147,718	\$7,815	\$51,585	\$103,947	\$0	-	\$0
F3N	Q2	N	7/13/2012	21	12952417377	4/1/2012	6/30/2012	\$103,947	\$5,868	\$3,945	\$105,871	-	-	\$0
F3A	Q2	A	7/16/2013	21	13941157425	4/1/2012	6/30/2012	\$103,947	\$5,868	\$3,945	\$105,871	-	-	\$0
F3N	Q3	N	10/15/2012	14	12972652802	7/1/2012	9/30/2012	\$105,871	\$256	\$1,020	\$105,106	-	-	\$0
F3A	Q3	A	7/16/2013	15	13941157462	7/1/2012	9/30/2012	\$105,871	\$256	\$1,020	\$105,106	-	-	\$0
F3N	YE	N	1/31/2013	12	13960618474	10/1/2012	12/31/2012	\$105,106	\$150	\$1,063	\$104,193	-	-	\$0
F3A	YE	A	7/16/2013	13	13941157477	10/1/2012	12/31/2012	\$105,106	\$150	\$1,063	\$104,193	-	-	\$0
F2		A	10/20/2011	3	11030680504			-	-	-	-	-	-	-
F2N		N	10/5/2011	1	11952508963			-	-	-	-	-	-	-
F1		N	9/13/2011	5	11030662039			-	-	-	-	-	-	-
Totals									\$176,014	\$71,821				

Law Offices of

OLSON

HAGEL &

FISHBURN

LLP

RECEIVED
FEC MAIL CENTER
2015 MAY 26 PM 12:30

May 19, 2015

VIA CERTIFIED MAIL

Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

RE: Debt Settlement Plan Corbett for Congress (C00502088)

To Whom It May Concern:

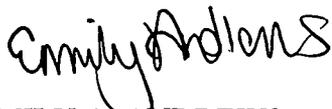
Enclosed please find a Debt Settlement Plan (FEC Form 8) for the Corbett for Congress committee, FEC ID# C00502088.

We would appreciate the prompt review of this plan in order to terminate the committee as soon as possible.

Should you have any questions or need any further information please do not hesitate to contact me.

Very truly yours,

OLSON HAGEL & FISHBURN LLP



EMILY A. ANDREWS

Enclosure

I:\WPDOC\PUBLIC\POL\22413-5\Debt Settlement Plan Cover Letter to FEC_5.19.15.docx

Lance H. Olson
Deborah B. Caplan
Richard C. Miodich
Richard R. Rios

Bruce J. Hagel
of counsel
Diane M. Fishburn
of counsel
Christopher W. Waddell
Lacey E. Keys
Emily A. Andrews
Erika M. Boyd

Attachment 1, page 4 of 30

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DEBT SETTLEMENT PLAN

RECEIVED
FEC MAIL CENTER
2015 MAY 26 PM 12:30

NAME OF COMMITTEE Corbett for Congress	
ADDRESS 555 Capitol Mall Suite 1425	
CITY, STATE AND ZIP CODE Sacramento, CA 95814	FEC I.D. NUMBER C00502088

PART I — COMMITTEE SUMMARY INFORMATION

1. CASH ON HAND AS OF <u>3/3/15</u>	\$9,819.19	6. TOTAL AMOUNT OF DEBTS OWED BY THE COMMITTEE	\$68,000
2. TOTAL ASSETS TO BE LIQUIDATED	\$0.00	7. TOTAL NUMBER OF CREDITORS OWED	2
3. TOTAL (ADD 1 AND 2)	\$9,819.19	8. NUMBER OF CREDITORS IN PART II OF THIS PLAN	2
4. YEAR TO DATE RECEIPTS	\$0.00	9. TOTAL AMOUNT OF DEBTS OWED TO THE CREDITORS IN PART II OF THIS PLAN	\$68,000
5. YEAR TO DATE DISBURSEMENTS	\$549.49	10. TOTAL AMOUNT TO BE PAID TO CREDITORS IN PART II OF THIS PLAN	\$18,119.19

11. IS THE COMMITTEE TERMINATING ITS ACTIVITIES?

YES NO IF YES, WHEN DOES THE COMMITTEE EXPECT TO FILE A TERMINATION REPORT? IF NO, COMMITTEE IS NOT ELIGIBLE TO FILE A DEBT SETTLEMENT PLAN (SEE INSTRUCTIONS).
The committee will file a termination report upon approval of the debt settlement plan.

12. IF THIS IS AN AUTHORIZED COMMITTEE, DOES THE CANDIDATE HAVE OTHER AUTHORIZED COMMITTEES?

YES NO IF YES, LIST BELOW.

13. DOES THE COMMITTEE HAVE SUFFICIENT FUNDS TO PAY THE TOTAL AMOUNT INDICATED IN THIS PLAN?

YES NO IF NO, WHAT STEPS WILL BE TAKEN TO OBTAIN THE FUNDS?

14. HAS THE COMMITTEE FILED PREVIOUS DEBT SETTLEMENT PLANS?

YES NO

15. AFTER DISPOSING OF ALL THE COMMITTEE'S DEBTS AND OBLIGATIONS, WILL THERE BE ANY RESIDUAL FUNDS?

YES NO IF YES, HOW WILL THE FUNDS BE DISBURSED?
After disposing the of the debts as laid out in this plan, committee will have \$1,700 left. \$1,500 will be paid as a flat fee to Olson, Hagel & Fishburn LLP to terminate the committee, and \$200 is reserved for a check that the committee wrote last year and now needs to void and reissue. Committee bank account will then be \$0.

I certify, to the best of my knowledge, that the information contained in this Debt Settlement Plan is true, correct and complete.

SIGNATURE OF
TREASURER OF
COMMITTEE



DATE
4/14/15

FEC FORM 8
(Revised 1/2001)

110001141101418

DEBT SETTLEMENT PLAN**PART II**

NAME OF COMMITTEE Corbett for Congress	FEC I.D. NUMBER C0050288	PAGE 1	OF 2
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CREDITOR SUMMARY INFORMATION
(FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR SG&A Campaigns, Inc. 600 Playhouse Alley, Suite 504 Pasadena, CA 91101	DATE INCURRED	AMOUNT OWED TO CREDITOR	AMOUNT OFFERED IN SETTLEMENT
	June 2014	\$50,000	\$10,000 (Paid on 10/20/14)

TYPE OF CREDITOR:

INCORPORATED COMMERCIAL VENDOR
 UNINCORPORATED COMMERCIAL VENDOR
 CANDIDATE
 COMMITTEE EMPLOYEE
 OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

Vendor is a campaign consultant that regularly extends short-term credit to customers by providing services in advance of payment. Vendor and the committee initially had a contract for \$50,000.

On October 20, 2014, the committee made a \$10,000 payment to SG&A Campaigns, Inc. in settlement of the \$50,000 debt owed.

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

In October 2014, the committee paid vendor \$10,000 toward the \$50,000 owed. Candidate attempted to raise funds in order to pay outstanding debts, but has not been able to raise enough funds to pay this creditor anything more. The candidate no longer holds elective office and has no prospect of raising additional funds to pay this debt.

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

Regular invoices were sent to the committee. After receiving \$10,000 payment in October, the vendor has agreed to write off the rest of this debt as a business decision in order to allocate the remaining funds toward the obligation owed to The California Group. As a campaign consulting firm, vendor has to work regularly with vendors such as The California Group and it is in the vendor's business interest to make sure that the vendors it works with get paid.

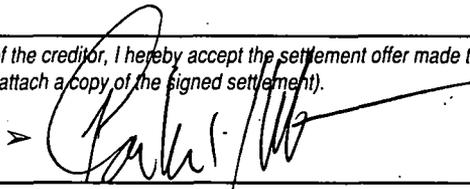
CREDITOR SECTION
(TO BE FILLED OUT BY CREDITOR)**D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?**

YES NO IF NO, PLEASE EXPLAIN

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

YES NO IF NO, PLEASE EXPLAIN

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF
CREDITOR OR
REPRESENTATIVE


DATE

5-10-15

1100014110140

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE Corbett for Congress	FEC I.D. NUMBER C00502088	PAGE 2	OF 2
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CREDITOR SUMMARY INFORMATION (FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR The California Group 381 Bush Street Suite 300 San Francisco, CA 94104	DATE INCURRED	AMOUNT OWED TO CREDITOR	AMOUNT OFFERED IN SETTLEMENT
	March-May 2014	\$18,000	\$8,119.19

TYPE OF CREDITOR:

- INCORPORATED COMMERCIAL VENDOR
 UNINCORPORATED COMMERCIAL VENDOR
 CANDIDATE
 COMMITTEE EMPLOYEE
 OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

Vendor ordinarily extends credit to customers in the regular course of business. From 10/21/13 through 5/21/14, vendor regularly extended credit to the committee and the committee paid the vendor a total of \$33,000. The outstanding debt of \$18,000 is for fundraising consulting from March through May 2014. Candidate subsequently lost the June 2014 primary election.

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

Candidate attempted to raise funds in order to pay outstanding debts, but has not been able to raise enough funds to pay this creditor. The candidate no longer holds elective office and has no prospect of raising additional funds.

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

Regular invoices were sent to the committee.

CREDITOR SECTION (TO BE FILLED OUT BY CREDITOR)

D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

YES NO IF NO, PLEASE EXPLAIN

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

YES NO IF NO, PLEASE EXPLAIN

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF
CREDITOR OR
REPRESENTATIVE

M. Pulliam

DATE
4/21/15

GUTHRIE | WIN | GUTHRIE

DEBT SETTLEMENT PLAN

PART III

NAME OF COMMITTEE Corbett for Congress	FEC I.D. NUMBER	PAGE 1	OF 1
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LIST REMAINING DEBTS

A. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR	AMOUNT OWED TO CREDITOR	AMOUNT EXPECTED TO PAY/OFFER
SG&A Campaigns, Inc. 600 Playhouse Alley, Suite 504 Pasadena, CA 91101 TYPE OF CREDITOR: <input checked="" type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	\$50,000	\$10,000 (Paid in October 2014)
B. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR The California Group 381 Bush Street, Suite 300 San Francisco, CA 94104 TYPE OF CREDITOR: <input checked="" type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	\$18,000	\$8,119.19
C. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO		
D. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO		
E. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO		

DOES THE COMMITTEE HAVE SUFFICIENT FUNDS TO PAY THE REMAINING AMOUNTS TO BE PAID OR OFFERED?

YES NO IF NO, WHAT STEPS WILL BE TAKEN TO OBTAIN THE FUNDS?

11/10/14 11:51 AM

RECEIVED
FEC MAIL CENTER
2015 JUL 17 PM 12:36

Law Offices of

OLSON

HAGEL &

FISHBURN

LLP

July 13, 2015

VIA ELECTRONIC DELIVERY & CERTIFIED MAIL

Mr. Christopher Ritchie
Sr. Campaign Finance & Reviewing Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: Debt Settlement Plan-Corbett for Congress C00502088

Dear Mr. Ritchie:

I serve as campaign counsel for the above referenced committee. This letter is written in response to your recent request for additional information regarding the committee's debt settlement plan received by the Federal Election Commission on May 19, 2015.

The committee is submitting an amended debt settlement plan based on the information you requested. Specifically, the debts owed to creditors now match the report the committee will file this week covering activity through June 30, 2015. Original signatures are affixed to the original plan filed May 19, 2015 and the amounts offered to creditors under the revised plan do not differ from the amounts offered under the original plan.

The original DSP reported \$68,000 in total debts owed by the committee, including \$50,000 owed to SG&A Campaigns. The original DSP was drafted to reflect that the committee originally owed SG&A Campaigns \$50,000, and made payment of \$10,000 in October 2014. Since the committee is not offering any amount to SG&A in settlement, the committee wanted to demonstrate that a good faith effort was made to pay part of the total amount owed to SG&A before the committee concluded it would not be able to raise additional funds to extinguish the debt.

As of June 30, 2015, the committee has cash-on-hand of \$8,675.13. Of that, the committee is offering \$8,119.19 to The California Group. The committee paid \$10,000 to SG&A Campaigns last fall, but is not offering any amount to SG&A in settlement of the \$40,000 currently owed. The remaining \$555.94 will be used to pay our law firm for ongoing compliance and campaign report preparation until the committee is terminated. In addition, \$200.00 of the remaining balance is reserved for a check the committee wrote last year and now needs to void and reissue.

Please do not hesitate to contact me with additional questions.

Very truly yours,

OLSON HAGEL & FISHBURN LLP



EMILY A. ANDREWS

I:\WPDOC\PUBLIC\POL\22413-5\Corbett RFAI Response 7.13.15.docx

Lance H. Olson

Deborah B. Caplan

Richard C. Miadich

Richard R. Rios

Bruce J. Hagel
of counsel

Diane M. Fishburn
of counsel

Christopher W. Waddell

Lacey E. Keys

Emily A. Andrews

Erika M. Boyd



DEBT SETTLEMENT PLAN

RECEIVED
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2015 JUL 17 PM 12:36

NAME OF COMMITTEE Corbett for Congress	
ADDRESS 555 Capitol Mall Suite 1425	
CITY, STATE AND ZIP CODE Sacramento, CA 95814	FEC I.D. NUMBER C00502088

PART I — COMMITTEE SUMMARY INFORMATION

1. CASH ON HAND AS OF <u>6/30/15</u>	\$8,675.13	6. TOTAL AMOUNT OF DEBTS OWED BY THE COMMITTEE	\$58,000
2. TOTAL ASSETS TO BE LIQUIDATED	\$0	7. TOTAL NUMBER OF CREDITORS OWED	2
3. TOTAL (ADD 1 AND 2)	\$8,675.13	8. NUMBER OF CREDITORS IN PART II OF THIS PLAN	2
4. YEAR TO DATE RECEIPTS	\$0	9. TOTAL AMOUNT OF DEBTS OWED TO THE CREDITORS IN PART II OF THIS PLAN	\$58,000
5. YEAR TO DATE DISBURSEMENTS	\$1,696.01	10. TOTAL AMOUNT TO BE PAID TO CREDITORS IN PART II OF THIS PLAN	\$8,119.19

11. IS THE COMMITTEE TERMINATING ITS ACTIVITIES?

YES NO IF YES, WHEN DOES THE COMMITTEE EXPECT TO FILE A TERMINATION REPORT? IF NO, COMMITTEE IS NOT ELIGIBLE TO FILE A DEBT SETTLEMENT PLAN (SEE INSTRUCTIONS).

The committee will file a termination report upon approval of the debt settlement plan.

12. IF THIS IS AN AUTHORIZED COMMITTEE, DOES THE CANDIDATE HAVE OTHER AUTHORIZED COMMITTEES?

YES NO IF YES, LIST BELOW.

13. DOES THE COMMITTEE HAVE SUFFICIENT FUNDS TO PAY THE TOTAL AMOUNT INDICATED IN THIS PLAN?

YES NO IF NO, WHAT STEPS WILL BE TAKEN TO OBTAIN THE FUNDS?

14. HAS THE COMMITTEE FILED PREVIOUS DEBT SETTLEMENT PLANS?

YES NO

15. AFTER DISPOSING OF ALL THE COMMITTEE'S DEBTS AND OBLIGATIONS, WILL THERE BE ANY RESIDUAL FUNDS?

YES NO IF YES, HOW WILL THE FUNDS BE DISBURSED?

After disposing of the debts as laid out in this plan, committee will have \$555.94 left. \$200 is reserved for a check that the committee wrote last year and now needs to void and reissue. The remainder will be paid will be paid to Olson, Hagel & Fishburn LLP to terminate the committee. Committee bank account will then be \$0.

I certify, to the best of my knowledge, that the information contained in this Debt Settlement Plan is true, correct and complete.

SIGNATURE OF
TREASURER OF
COMMITTEE ➤

DATE

FEC FORM 8
(Revised 1/2001)

2015-07-17 11:00:100010004

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE Corbett for Congress	FEC I.D. NUMBER C00502088	PAGE 1	OF 2
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CREDITOR SUMMARY INFORMATION
(FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR	DATE INCURRED	AMOUNT OWED TO CREDITOR	AMOUNT OFFERED IN SETTLEMENT
SG&A Campaigns, Inc. 600 Playhouse Alley, Suite 504 Pasadena, CA 91101	June 2014	\$40,000	\$0

TYPE OF CREDITOR:

- INCORPORATED COMMERCIAL VENDOR
 UNINCORPORATED COMMERCIAL VENDOR
 CANDIDATE
 COMMITTEE EMPLOYEE
 OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

Vendor and the committee signed a contract for \$50,000 and the committee was sent an invoice for \$50,000 due June 1, 2014. Vendor is a campaign consultant that regularly provides consulting services in advance of payment. The contract was for campaign consulting, strategy, and production and design of campaign materials.

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

In October 2014, the committee paid vendor \$10,000 toward the \$50,000 owed. The candidate no longer holds elective office and has no prospect of raising additional funds.

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

Regular invoices were sent to the committee. After receiving the \$10,000 payment in October, the vendor has now agreed to write off the rest of this debt as a business decision in order for the committee to allocate the remaining funds toward the obligation owed to The California Group. As a campaign consulting firm, vendor has to work regularly with vendors such as The California Group and it is in the vendor's business interest to make sure that the vendors it works with get paid.

CREDITOR SECTION
(TO BE FILLED OUT BY CREDITOR)

D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

- YES
 NO
 IF NO, PLEASE EXPLAIN

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

- YES
 NO
 IF NO, PLEASE EXPLAIN

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF
CREDITOR OR
REPRESENTATIVE

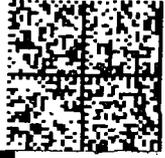


DATE

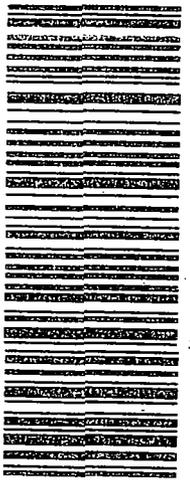
UNASSIGNED - NO - STOP

U.S. POSTAGE PITNEY BOWES
ZIP 95814 \$ 005.33⁵
02 1W
0001395741 JUL 13 2015

RECEIVED
FEC MAIL CENTER
2015 JUL 17 PM 12:36



CERTIFIED MAIL



9414 8149 0149 0384 0010 62

555 Capitol Mall, Suite
Sacramento, CA 9581



RETURN RECEIPT REQUESTED

Mr. Christopher Ritchie
Sr. Campaign Finance & Reviewing Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20463



Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked Date of Receipt
<input checked="" type="checkbox"/> USPS Registered/Certified	Postmarked (R/C) 7/13/15
<input type="checkbox"/> USPS Priority Mail	Postmarked
<input type="checkbox"/> USPS Priority Mail Express	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
	Next Business Day Delivery <input type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked


 PREPARER

7/17/15
 DATE PREPARED

NOV 10 10 00 AM '15



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MS-B

May 27, 2015

ELLEN CORBETT, TREASURER
CORBETT FOR CONGRESS
555 CAPITOL MALL SUITE 1425
SACRAMENTO, CA 95814

IDENTIFICATION NUMBER: C00502088

REFERENCE: DEBT SETTLEMENT PLAN

Dear Treasurer:

We are in receipt of your debt settlement plan. The Commission is in the process of reviewing the plan to ensure that it complies with the requirements of the Federal Election Campaign Act (the Act) and Commission Regulations governing debt settlements (11 CFR Part 116).

Until you are notified by the Commission that the debt settlement plan complies with the Act and Regulations, you should continue to file all required reports and continue to report all debts including debts involved in the debt settlement plan (11 CFR § 104.11).

If you have any questions regarding this matter, please do not hesitate to contact me in our Reports Analysis Division on the toll free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division). My local number is (202) 694-1146.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Ritchie".

Christopher Ritchie
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MS-C

June 7, 2015

ELLEN CORBETT, TREASURER
CORBETT FOR CONGRESS
555 CAPITOL MALL SUITE 1425
SACRAMENTO, CA 95814

Response Due Date

IDENTIFICATION NUMBER: C00502088

07/13/2015

REFERENCE: DEBT SETTLEMENT PLAN, RECEIVED 5/19/2015

Dear Treasurer:

This letter is prompted by the Commission's review of your Debt Settlement Plan (DSP). In order to complete our review, the following information is needed:

-The total amount of debts owed by the committee on Line 6, Part I of the DSP does not equal the total amount of outstanding debts disclosed on your last report, the 2015 April Quarterly Report. Please amend your report or DSP to clarify this discrepancy.

-On Line 10 for Part I you indicate \$18,119.19 as the amount to be paid to the creditors; however, it appears that your committee does not have the cash on hand to pay this amount. Please clarify this discrepancy.

-Please provide an explanation of the terms of the initial extension of credit by the creditor(s) included in Part II (i.e. specific terms of original contract, any amended contracts and/or terms, payment plans, etc.) and the nature of the debt(s) owed to the creditor(s).

-Please clarify the specific efforts taken by the committee to raise additional funds to repay the debt (i.e. fundraisers, phone banks, phone calls to supporters, mail solicitations, etc.).

-In Part II of your DSP for SG&A Campaigns, Inc. you list the amount owed as \$50,000.00; which does not equal the outstanding debt disclosed on your last report, the 2015 April Quarterly Report. It also appears that you used a previous payment to this creditor as the amount offered in settlement. When filling out Part II of the DSP you should list the current debt owed to each creditor as of the last report, and the actual amount offered for settlement, not previous payments or total already paid.

Please note that payments should not be made to creditors involved in a DSP until the Commission's review has been completed.

CORBETT FOR CONGRESS

Page 2 of 2

A Debt Settlement between a committee and its creditors is filed when a terminating committee negotiates final payment at an amount less than that actually owed with its creditor to extinguish the debt. After reaching this agreement with the creditor, the committee submits an FEC FORM 8, DSP, for Commission review before making settlement payments. Once a committee is notified that the Commission has reviewed the DSP and determined that no violation resulted, the committee may pay the agreed upon amount to the creditor(s).

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. If the information is not provided, the processing of the DSP will be discontinued. You are reminded that until the Commission is able to complete its review, all debts including the debts involved in the DSP must be continuously reported. (11 CFR § 104.11)

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1146.

Sincerely,



638

Christopher Ritchie
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

FEC FORM 3

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) **TYPE OR PRINT** ▼ Example: If typing, type over the lines. 12FE4M5
Corbett for Congress

ADDRESS (number and street) 555 Capitol Mall, Suite 1425
 Check if different than previously reported. (ACC) Sacramento CA 95814

2. **FEC IDENTIFICATION NUMBER** ▼ C C00502088 3. IS THIS REPORT NEW (N) **OR** AMENDED (A) CA 15

4. **TYPE OF REPORT** (Choose One)
(a) Quarterly Reports:
 April 15 Quarterly Report (Q1)
 July 15 Quarterly Report (Q2)
 October 15 Quarterly Report (Q3)
 January 31 Year-End Report (YE)
 Termination Report (TER)

(b) 12-Day **PRE**-Election Report for the:
 Primary (12P) General (12G) Runoff (12R)
 Convention (12C) Special (12S)
Election on M M / D D / Y Y Y Y in the State of
(c) 30-Day **POST**-Election Report for the:
 General (30G) Runoff (30R) Special (30S)
Election on M M / D D / Y Y Y Y in the State of

5. Covering Period M M / D D / Y Y Y Y 04 / 01 / 2015 through M M / D D / Y Y Y Y 06 / 30 / 2015

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.
Type or Print Name of Treasurer Ellen Corbett
Signature of Treasurer Ellen Corbett *[Electronically Filed]* Date M M / D D / Y Y Y Y 07 / 15 / 2015

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

SUMMARY PAGE
of Receipts and Disbursements

FEC Form 3 (Revised 02/2003)

PAGE 2 / 7

Write or Type Committee Name

Corbett for Congress

Report Covering the Period: From: M M / D D / Y Y Y Y 04 / 01 / 2015 To: M M / D D / Y Y Y Y 06 / 30 / 2015

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))....	0.00	0.00
(b) Total Contribution Refunds (from Line 20(d))	0.00	0.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a)).....	0.00	0.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	976.48	2326.39
(b) Total Offsets to Operating Expenditures (from Line 14).....	0.00	0.00
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a)).....	976.48	2326.39
8. Cash on Hand at Close of Reporting Period (from Line 27).....	8675.13	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D).....	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D).....	58000.00	

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE
of Receipts

FEC Form 3 (Revised 12/2003)

PAGE 3 / 7

Write or Type Committee Name

Corbett for Congress

Report Covering the Period: From: MM / DD / YYYY 04 / 01 / 2015 To: MM / DD / YYYY 06 / 30 / 2015

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	0.00	0.00
(ii) Unitemized.....	0.00	0.00
(iii) TOTAL of contributions from individuals ▶	0.00	0.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) The Candidate.....	0.00	0.00
(e) TOTAL CONTRIBUTIONS (other than loans) (add Lines 11(a)(iii), (b), (c), and (d))..	0.00	0.00
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	0.00	0.00
13. LOANS:		
(a) Made or Guaranteed by the Candidate.....	0.00	0.00
(b) All Other Loans.....	0.00	0.00
(c) TOTAL LOANS (add Lines 13(a) and (b)).....	0.00	0.00
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	0.00	0.00
15. OTHER RECEIPTS (Dividends, Interest, etc.).....	0.00	0.00
16. TOTAL RECEIPTS (add Lines 11(e), 12, 13(c), 14, and 15) (Carry Total to Line 24, page 4)..... ▶	0.00	0.00

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3 (Revised 02/2003)

PAGE 4 / 7

II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
17. OPERATING EXPENDITURES.....	976.48	2326.39
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	0.00	0.00
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate.....	0.00	0.00
(b) Of All Other Loans	0.00	0.00
(c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and (b)).....	0.00	0.00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b), and (c)).....	0.00	0.00
21. OTHER DISBURSEMENTS	0.00	0.00
22. TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d), and 21) ►	976.48	2326.39

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....	9651.61
24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3).....	0.00
25. SUBTOTAL (add Line 23 and Line 24).....	9651.61
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....	976.48
27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (subtract Line 26 from Line 25).....	8675.13

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)		PAGE 5 OF 7	
	<input checked="" type="checkbox"/> 17 20a	<input type="checkbox"/> 18 20b	<input type="checkbox"/> 19a 20c	<input type="checkbox"/> 19b 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Corbett for Congress

Full Name (Last, First, Middle Initial) A. Olson Hagel & Fishburn, LLP		Date of Disbursement M M / D D / Y Y Y Y 04 / 15 / 2015
Mailing Address 555 Capitol Mall, Suite 1425		Amount of Each Disbursement this Period 206.94
City Sacramento State CA Zip Code 95814	Purpose of Disbursement Legal & Reporting Services Category/Type 001	
Candidate Name		Transaction ID : EXPB1132
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	State: District:	

Full Name (Last, First, Middle Initial) B. Olson Hagel & Fishburn, LLP		Date of Disbursement M M / D D / Y Y Y Y 05 / 15 / 2015
Mailing Address 555 Capitol Mall, Suite 1425		Amount of Each Disbursement this Period 542.70
City Sacramento State CA Zip Code 95814	Purpose of Disbursement Legal & Reporting Services Category/Type 001	
Candidate Name		Transaction ID : EXPB1133
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	State: District:	

Full Name (Last, First, Middle Initial) C. Olson Hagel & Fishburn, LLP		Date of Disbursement M M / D D / Y Y Y Y 06 / 15 / 2015
Mailing Address 555 Capitol Mall, Suite 1425		Amount of Each Disbursement this Period 226.84
City Sacramento State CA Zip Code 95814	Purpose of Disbursement Legal & Reporting Services Category/Type 001	
Candidate Name		Transaction ID : EXPB1134
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	State: District:	

SUBTOTAL of Disbursements This Page (optional).....	976.48
TOTAL This Period (last page this line number only).....	976.48

SCHEDULE D (FEC Form 3)
DEBTS AND OBLIGATIONS
Excluding Loans

(Use separate schedule(s) for each numbered line)

FOR LINE NUMBER: (check only one) 9 10

NAME OF COMMITTEE (In Full)

Corbett for Congress

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor
SG&A Campaigns, Inc.

Mailing Address 600 Playhouse Alley, Suite 504

City State Zip Code
 Pasadena CA 91101

Nature of Debt (Purpose):
 Campaign Consulting

Outstanding Balance Beginning This Period **Transaction ID : PAYD1060**
 40000.00

Amount Incurred This Period Payment This Period Outstanding Balance at Close of This Period
 0.00 0.00 40000.00

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor
The California Group

Mailing Address 381 Bush Street, Suite 300

City State Zip Code
 San Francisco CA 94104

Nature of Debt (Purpose):
 Fundraising Consulting

Outstanding Balance Beginning This Period **Transaction ID : PAYD998**
 6000.00

Amount Incurred This Period Payment This Period Outstanding Balance at Close of This Period
 0.00 0.00 6000.00

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor
The California Group

Mailing Address 381 Bush Street, Suite 300

City State Zip Code
 San Francisco CA 94104

Nature of Debt (Purpose):
 Fundraising Consulting

Outstanding Balance Beginning This Period **Transaction ID : PAYD999**
 6000.00

Amount Incurred This Period Payment This Period Outstanding Balance at Close of This Period
 0.00 0.00 6000.00

1) SUBTOTALS This Period This Page (optional)	▶	52000.00
2) TOTALS This Period (last page this line number only)	▶	
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only).....	▶	
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) ▶		

SCHEDULE D (FEC Form 3)
DEBTS AND OBLIGATIONS
Excluding Loans

(Use separate schedule(s) for each numbered line)

FOR LINE NUMBER: (check only one) 9 10

NAME OF COMMITTEE (In Full)

Corbett for Congress

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor
The California Group

Mailing Address 381 Bush Street, Suite 300

City State Zip Code
 San Francisco CA 94104

Nature of Debt (Purpose):
 Fundraising Consulting

Outstanding Balance Beginning This Period **Transaction ID : PAYD883**
 6000.00

Amount Incurred This Period Payment This Period Outstanding Balance at Close of This Period
 0.00 0.00 6000.00

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Mailing Address

City State Zip Code

Nature of Debt (Purpose):

Outstanding Balance Beginning This Period

Amount Incurred This Period Payment This Period Outstanding Balance at Close of This Period

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Mailing Address

City State Zip Code

Nature of Debt (Purpose):

Outstanding Balance Beginning This Period

Amount Incurred This Period Payment This Period Outstanding Balance at Close of This Period

1) SUBTOTALS This Period This Page (optional)	6000.00
2) TOTALS This Period (last page this line number only)	58000.00
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only).....	0.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) ▶	58000.00

Attachment 2

From: Emily Andrews
To: MFORMAN@fec.gov
Subject: Corbett for Congress Debt Settlement Plan
Date: Wednesday, September 02, 2015 8:30:00 PM
Attachments: [image001.png](#)

Margaret,

Per our conversation yesterday, you sked me to clarify whether the \$10,000 payment made by Corbett for Congress to SG&A campaigns in October 2014 was made as part of a debt settlement. As indicated in the DSP and the Form 99 that was filed with the FEC in July, this payment was made prior to the point at which the committee determined it would need to file a debt settlement plan. Although the committee is not able to offer any additional payment to SG&A in settlement under the DSP and SG&A has agreed to settle for no additional payment, the committee's payment to SG&A in October 2014 demonstrates a good faith effort to pay part of the total amount owed to SG&A before the committee concluded it would not be able to raise additional funds to extinguish the debt.

Please let me know if you need further clarification regarding this payment. Per our discussion, I am reaching out to all parties to obtain signatures on the amended DSP and will submit to you as soon as possible.

Have a great holiday weekend.

Best Regards,

Emily

Emily Andrews, Attorney

OLSON HAGEL & FISHBURN LLP

555 Capitol Mall, Suite 1425
Sacramento, CA 95814
916.442.2952 – phone
916.442.1280 – facsimile

www.olsonhagel.com

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From: Emily Andrews
To: [Margaret Forman](#)
Subject: RE: Debt Settlement Plan
Date: Monday, June 19, 2017 7:55:41 PM
Attachments: [image001.png](#)
[SGA Debt Settlement EC-0614.pdf](#)
info@olsonhagel.com 20150916_170732.pdf

Dear Ms. Forman,

Thank you for your detailed response back in January regarding this committee's debt settlement plan.

We have now secured the missing signature from the creditor on the revised debt settlement plan. This signature page, as well as the signature pages from the other creditor and the treasurer (previously submitted) are attached.

Please let me know any additional steps we need to take to re-open this matter and put it before the Commission for approval.

Best Regards,

Emily

Emily Andrews, Attorney

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--- Original Message ---

From: Margaret Forman
Received: 01/12/2017 12:45 PM
To: Emily@olsonhagel.com
Subject: RE: Debt Settlement Plan

Hello Ms. Andrews –

Thank you for your email. While you were out of the country, I looked into the Debt Settlement Plan for Corbett for Congress (C00502088). The Commission will need additional documentation and information in order to consider the Committee's plan. This is specified below. Also, please be aware that this matter is still closed, and is not before the Commission, since we are still awaiting this information.

First, you will need to submit the debt settlement plan with the signatures of the treasurer and all creditors with whom the Committee is settling. 11 C.F.R. §§ 104.14(a), 104.18(g), & 116.7(e)(2).

Second, you mention that you are unable to contact one of the creditors. You may submit in your debt settlement plan a request for the Commission to determine that a debt owed to a creditor is not payable for the purposes of the act if the requirements of 11 C.F.R. §§ 116.3, 116.5 or 116.6, as appropriate, and if the requirements of 116.9(a) are met. 11 C.F.R. § 116.9(b). The Committee is required to continue to disclose the debt on its schedules of outstanding debts and obligations until the Commission has completed its review of the debt settlement plan pursuant to 11 C.F.R. § 116.7(f) and has determined that the debt is not payable for the purposes of the Federal Election Campaign Act. Id.

Finally, you make reference in your email to being advised by "a staff person at the FEC" that signatures were not required in your second filed plan "because the amounts offered in settlement did not change from what was initially included." The substance of the filings between the Committee's first plan, submitted May 19, 2015, and its second (and most recently filed) plan, submitted on July 13, 2015, is a significant change—the first plan showed a payment previously made to this creditor on October 20, 2014, according to the 2014 Amended Year-End Report, filed on April 14, 2015. The second plan showed no payment amount offered in settlement. This is a significant change because, as the Reports Analysis Division indicated to the Committee in its July 7, 2015 correspondence regarding the first plan, when filing a debt settlement plan, the Committee must "list the current debt owed to each creditor as of the last report, and the actual amount offered for settlement, not previous payments or totals already paid." See 11 C.F.R. § 116.7(a). Again, such a plan must be signed by each creditor. 11 C.F.R. § 116.7(e)(2).

Please let me know if you have any questions.

Thank you,

Margaret J. Forman, Attorney

Federal Election Commission

Policy Division

Compliance Advice team

202-694-1353

From: Emily Andrews [<mailto:Emily@olsonhagel.com>]

Sent: Monday, December 26, 2016 5:06 PM

To: Margaret Forman <mforman@fec.gov>

Subject: Debt Settlement Plan

Margaret,

I am getting in touch regarding a Debt Settlement Plan that we connected about in 2015 for Corbett for Congress (ID C00502088).

At the time, you requested that we obtain signatures on a revised plan from all parties. Revisions were made to the debt settlement plan in response to an RFAI. The revisions were non-substantive and did not change the amounts being offered to the vendors in settlement. We were initially advised by the staff person at the FEC handling debt settlements that signatures were not required on the updated forms because the amounts offered in settlement did not change from what was initially included.

In accordance with your request, signatures were provided from there candidate and one vendor, but not for vendor SG&A campaigns. We have reached out to SG&A campaigns multiple times, but have not received a response regarding the signature on the updated plan.

I wanted to inquire what options the campaign has in light of this. In addition, vendor California Group (who will be paid under the plan) has notified us that the business is planning to wind down its operations. As a result, the vendor is hoping to be paid as soon as possible before winding down. I wanted to seek your input on what options this vendor has.

Many thanks for your assistance and happy holidays! I will be out of the country the next two weeks, but look forward to receiving your guidance when I return.

Best Regards,

Emily Andrews

Emily Andrews, Attorney

OLSON HAGEL & FISHBURN LLP
555 Capitol Mall, Suite 1425
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DEBT SETTLEMENT PLAN

NAME OF COMMITTEE Corbett for Congress	
ADDRESS 555 Capitol Mall Suite 1425	
CITY, STATE AND ZIP CODE Sacramento, CA 95814	FEC ID. NUMBER C00602088

PART I — COMMITTEE SUMMARY INFORMATION

1. CASH ON HAND AS OF <u>6/30/15</u>	\$8,675.13	6. TOTAL AMOUNT OF DEBTS OWED BY THE COMMITTEE	\$58,000
2. TOTAL ASSETS TO BE LIQUIDATED	\$0	7. TOTAL NUMBER OF CREDITORS OWED	2
3. TOTAL (ADD 1 AND 2)	\$8,675.13	8. NUMBER OF CREDITORS IN PART II OF THIS PLAN	2
4. YEAR TO DATE RECEIPTS	\$0	9. TOTAL AMOUNT OF DEBTS OWED TO THE CREDITORS IN PART II OF THIS PLAN	\$58,000
5. YEAR TO DATE DISBURSEMENTS	\$1,696.01	10. TOTAL AMOUNT TO BE PAID TO CREDITORS IN PART II OF THIS PLAN	\$8,119.19

11. IS THE COMMITTEE TERMINATING ITS ACTIVITIES?

YES NO IF YES, WHEN DOES THE COMMITTEE EXPECT TO FILE A TERMINATION REPORT? IF NO, COMMITTEE IS NOT ELIGIBLE TO FILE A DEBT SETTLEMENT PLAN (SEE INSTRUCTIONS).

The committee will file a termination report upon approval of the debt settlement plan.

12. IF THIS IS AN AUTHORIZED COMMITTEE, DOES THE CANDIDATE HAVE OTHER AUTHORIZED COMMITTEES?

YES NO IF YES, LIST BELOW.

13. DOES THE COMMITTEE HAVE SUFFICIENT FUNDS TO PAY THE TOTAL AMOUNT INDICATED IN THIS PLAN?

YES NO IF NO, WHAT STEPS WILL BE TAKEN TO OBTAIN THE FUNDS?

14. HAS THE COMMITTEE FILED PREVIOUS DEBT SETTLEMENT PLANS?

YES NO

15. AFTER DISPOSING OF ALL THE COMMITTEE'S DEBTS AND OBLIGATIONS, WILL THERE BE ANY RESIDUAL FUNDS?

YES NO IF YES, HOW WILL THE FUNDS BE DISBURSED?

After disposing of the debts as laid out in this plan, committee will have \$555.94 left. \$200 is reserved for a check that the committee wrote last year and now needs to void and release. The remainder will be paid to Olson, Hugel & Fishburn LLP to terminate the committee. Committee bank account will then be \$0.

I certify, to the best of my knowledge, that the information contained in this Debt Settlement Plan is true, correct and complete.

SIGNATURE OF TREASURER OF COMMITTEE 	DATE <u>9/16/15</u>	FEC FORM 8 (Revised 1/2001)
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FE14M081.PDF

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE Corbett for Congress	FEO I.D. NUMBER C00502088	PAGE 2	OF 2
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CREDITOR SUMMARY INFORMATION
(FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR	DATE INCURRED	AMOUNT OWED TO CREDITOR	AMOUNT OFFERED IN SETTLEMENT
The California Group 381 Bush Street Suite 300 503 San Francisco, CA 94104	March-May 2014	\$18,000	\$8,119.19

TYPE OF CREDITOR:

INCORPORATED COMMERCIAL VENDOR
 UNINCORPORATED COMMERCIAL VENDOR
 CANDIDATE
 COMMITTEE EMPLOYEE
 OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

Vendor and the committee had a contract whereby the committee agreed to pay Vendor \$6,000 per month for campaign consulting and fundraising services. From 10/21/13 through 5/14/2014, the committee and the committee paid vendor a total of \$33,000. The outstanding debt of \$18,000 is for fundraising consulting from March through May of 2014. Candidate subsequently lost the June 2014 primary election.

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

Candidate attempted to raise funds in order to pay outstanding debts, but has not been able to raise enough funds to pay this creditor in full. The candidate no longer holds elective office and has no prospect of raising additional funds. Vendor has agreed to accept \$8,119.19 in settlement of the amount owed.

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

Regular invoices were sent to the committee.

CREDITOR SECTION
(TO BE FILLED OUT BY CREDITOR)

D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

YES NO IF NO, PLEASE EXPLAIN

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

YES NO IF NO, PLEASE EXPLAIN

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF
CREDITOR OR
REPRESENTATIVE

> *[Handwritten Signature]*

DATE

09-04-15

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE Corbett for Congress	FEC I.D. NUMBER C00502088	PAGE 1	OF 2
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CREDITOR SUMMARY INFORMATION
(FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR	DATE INCURRED	AMOUNT OWED TO CREDITOR	AMOUNT OFFERED IN SETTLEMENT
SG&A Campaigns, Inc. 600 Playhouse Alley, Suite 504 Pasadena, CA 91101	June 2014	\$40,000	\$0

TYPE OF CREDITOR:

INCORPORATED COMMERCIAL VENDOR
 UNINCORPORATED COMMERCIAL VENDOR
 CANDIDATE
 COMMITTEE EMPLOYEE
 OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

Vendor and the committee signed a contract for \$50,000 and the committee was sent an invoice for \$50,000 due June 1, 2014. Vendor is a campaign consultant that regularly provides consulting services in advance of payment. The contract was for campaign consulting, strategy, and production and design of campaign materials.

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

In October 2014, the committee paid vendor \$10,000 toward the \$50,000 owed. The candidate no longer holds elective office and has no prospect of raising additional funds.

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

Regular invoices were sent to the committee. After receiving the \$10,000 payment in October, the vendor has now agreed to write off the rest of this debt as a business decision in order for the committee to allocate the remaining funds toward the obligation owed to The California Group. As a campaign consulting firm, vendor has to work regularly with vendors such as The California Group and it is in the vendor's business interest to make sure that the vendors it works with get paid.

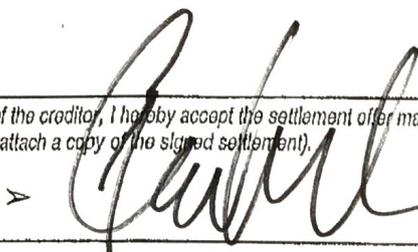
CREDITOR SECTION
(TO BE FILLED OUT BY CREDITOR)**D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?**

YES NO IF NO, PLEASE EXPLAIN

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

YES NO IF NO, PLEASE EXPLAIN

As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF
CREDITOR OR
REPRESENTATIVE


DATE

6/19/17