

Kerry Bentivolio for US Congress

P.O. Box 886

Walled Lake, MI 48390

October 30, 2014

Jeff S. Jordan
Assistant General Counsel
Complaints, Examination & Legal Administration
Federal Election Commission
999 E Street NW
Washington, DC 20436

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OFFICE OF GENERAL
COUNSEL

Dear Mr. Jordan,

This letter is a response to your letter dated October 15, 2014 regarding RR 14L-18R (Kerry Bentivolio for US Congress). These are my comments for your consideration as you proceed with your investigation.

I assumed the role of treasurer of the committee in September 2012. Prior to this, I worked with the former treasurer, Deborah Llewellyn, during a transition period and became aware of the inaccuracies in the original filings as well as the amendments she had filed. During this time, I came to the firm conclusion that there was no intention on her part to file reports that were inaccurate or misleading; I believe she truly used her best efforts with the knowledge and resources she had.

Ms. Llewellyn had no prior experience as a treasurer for a political campaign and no experience with campaign software. She did not know the right questions to ask in order to have complete, reportable data. As she increased her knowledge and received additional information, she amended the applicable filings.

I reviewed all filings submitted prior to September 2012 and reconciled them with the committee's bank statements to verify that all transactions had been accurately reflected in the filings. Following this review, I amended the 2012 April 15 Quarterly, July 15 Quarterly and 12 Day Pre-Primary filings.

The amended April 15 Quarter and July 15 Quarterly disclose additional disbursements of \$62,955.44. The majority of this did not involve disbursements to third parties. Rather, the majority -- \$50,000 -- was the repayment of a loan the candidate had made to the committee. Ms. Llewellyn was not aware at the time of the original filing that the candidate had repaid the loan.

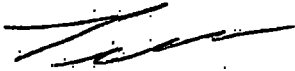
This matter was returned to the Office of the General Counsel from the Alternative Dispute Resolution Office because funds did not exist at the time to pay a penalty, and we had requested that a penalty not be imposed.

In summary, this matter involves a first time candidate and first time treasurer, with the majority of the variance involving a candidate loan on the first filing made by the committee. Since assuming the role of

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treasurer, I have corrected prior errors to ensure that the committee's filings are complete and accurately reflect the activity of the committee. We look forward to resolving this matter.

Sincerely,



Timothy Witt
Treasurer, Kerry Bentivolio for US Congress

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