

**HOLTZMAN VOGEL PLLC**  
*Attorneys at Law*

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OFFICE OF GENERAL  
COUNSEL

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September 15, 2010

Christopher Hughey  
Acting General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

**Re: MUR 6352 (Robert J Dold and Dold for Congress)**

Dear Mr. Hughey,

The Complainant has alleged that Dold for Congress violated 11 C.F.R. §104.3 by failing to report debts and obligations in connection with a bus tour on June 16 – 20, 2010. Dold for Congress strongly denies that there was any violation associated with the bus tour and has fully reported all disbursements and debts in accordance with FEC rules.

This bus tour was organized by a consultant to the campaign- Nahigian Strategies. All expenses associated with the bus tour were paid for by Nahigian Strategies and invoiced to Dold for Congress. This is a standard industry practice and is similar to the arrangement used for the February bus tour referenced by the complainant. In accordance with the consulting services arrangement between Nahigian and Dold for Congress, Nahigian Strategies invoices Dold for Congress for expenses on a monthly basis. The expenses for the bus tour were submitted to Dold for Congress, which promptly paid the amounts due in full. The invoice from Nahigian Strategies is attached.

As you can see from the attachment, the invoice for the bus tour is dated July 1, 2010 and was not received by the campaign until after the close of books for the second quarter report. Since the invoice was not received until after the close of books, it is not required to be reported as a debt on the second quarter report. Payment was made on July 13, 2010 and will be reflected on the third quarter report. A copy of the payment is attached.

**We ask that the Commission expeditiously dismiss this complaint.**

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Please do not hesitate to contact me in you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be 'Jason Torchinsky', written in a cursive style.

Jason Torchinsky

Enclosure

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