May 3, 2019

J. Bradley King, Co-Director  
Angela M. Nussmeyer, Co-Director  
Indiana Election Division  
302 West Washington Street, Room E204  
Indianapolis, Indiana 46204

Dear Co-Director King and Co-Director Nussmeyer:

This letter is in response to correspondence received from your office dated April 15, 2019, regarding a complaint filed by Indiana Democrat Party Chairman John Zody.

The complaint references flights arranged by the Republican Governors Association (RGA) for Governor Eric Holcomb to travel to and from meetings of the organization. In each of these cases, the RGA received an in-kind donation of a flight from an RGA donor and expended that in-kind donation by flying Governor Holcomb to or from an RGA meeting.

The sole purpose of Governor Holcomb’s travel was to benefit the RGA and its efforts. There was no effort by the RGA to benefit Governor Holcomb or the Eric Holcomb for Indiana campaign committee, and none of the cited instances of the RGA’s flying of Governor Holcomb constituted a “contribution” within the meaning of IC 3-5-2-15.

The RGA’s treatment of these transactions further demonstrates that these in-kind donations were made to, and for the benefit of, the RGA: the RGA reported its receipt and expenditure of the in-kind flight donations in its filings with the IRS, which can be found at www.irs.gov and are also included for your direct reference in Appendix A at the end of this letter.

Additionally, the complaint referenced that our committee “accepted direct political contributions on these dates.” While contributions were deposited with our financial institution on those particular dates, those contributions were unrelated to the RGA meetings. In fact, there is no fundraising done in support of individual campaign committees while on RGA travel and these meetings were no exception. The contributions referenced were for events that took place in some cases over a month prior to our receipt and deposit.

Sincerely,

[Signature]

Kyle Hupfer, Treasurer  
Eric Holcomb for Indiana
APPENDIX A:

Flight 07/22/2018

Contribution

Contributor's name, mailing address and ZIP code
BEAM LONGEST AND NEFF LLC
BEAM LONGEST AND NEFF LLC- IN-KIND
8126 CASTLETON ROAD
INDIANAPOLIS, IN 46250

Name of contributor's employer
N/A

Contributor's occupation
N/A

Amount of contribution
$ 25302

Expenditure

Recipient's name, mailing address and ZIP code
BEAM LONGEST & NEFF LLC- IN-KIND
8126 CASTLETON ROAD
INDIANAPOLIS, IN 46250

Name of recipient's employer
N/A

Recipient's occupation
N/A

Amount of Expenditure
$ 25302

Date of contribution
07/22/2018

Flight 07/25/2018

Contribution

Contributor's name, mailing address and ZIP code
NEW CENTAUR, LLC
NEW CENTAUR, LLC- IN-KIND
111 MONUMENT CIRCLE STE 777
INDIANAPOLIS, IN 46204

Name of contributor's employer
N/A

Contributor's occupation
N/A

Amount of contribution
$ 21486

Expenditure

Recipient's name, mailing address and ZIP code
NEW CENTAUR, LLC- IN-KIND
111 MONUMENT CIRCLE STE 777
INDIANAPOLIS, IN 46204

Name of recipient's employer
N/A

Recipient's occupation
N/A

Amount of Expenditure
$ 21486

Date of expenditure
07/25/2018

Flight 11/27/2018

Contribution

Contributor's name, mailing address and ZIP code
IN-KIND - Spectacle Entertainment LLC
111 Monument Circle, Ste. 777
Indianapolis, IN 46204-

Name of contributor's employer
N/A

Contributor's occupation
N/A

Amount of contribution
$ 33961

Expenditure

Recipient's name, mailing address and ZIP code
IN-KIND - Spectacle Entertainment, LLC
111 Monument Circle, Ste. 777
Indianapolis, IN 46204-

Name of recipient's employer
N/A

Recipient's occupation
N/A

Amount of Expenditure
$ 33961

Date of expenditure
11/27/2018