



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,



Kyle Hupfer, Treasurer
Eric Holcomb for Indiana

2019 MAY -6 AM 10:30

INDIANA ELECTIONS DIVISION

APPENDIX A:

Flight 07/22/2018

Contribution

Contributor's name, mailing address and ZIP code	Name of contributor's employer	Amount of contribution
BEAM LONGEST AND NEFF LLC BEAM LONGEST AND NEFF LLC-IN-KIND 8126 CASTLETON ROAD INDIANAPOLIS, IN 46250	N/A Contributor's occupation N/A	\$ 25302
	Aggregate contributions year-to-date \$ 25302	Date of contribution 07/22/2018

Expenditure

Recipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of Expenditure
BEAM LONGEST & NEFF LLC-IN-KIND 8126 CASTLETON ROAD INDIANAPOLIS, IN 46250	N/A Recipient's occupation N/A	\$ 25302
Purpose of expenditure IN-KIND TRAVEL		Date of expenditure 07/22/2018

Flight 07/25/2018

Contribution

Contributor's name, mailing address and ZIP code	Name of contributor's employer	Amount of contribution
NEW CENTAUR, LLC NEW CENTAUR, LLC-IN-KIND 111 MONUMENT CIRCLE STE 777 INDIANAPOLIS, IN 46204	N/A Contributor's occupation N/A	\$ 21486
	Aggregate contributions year-to-date \$ 396486	Date of contribution 07/25/2018

Expenditure

Recipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of Expenditure
NEW CENTAUR, LLC-IN-KIND 111 MONUMENT CIRCLE STE 777 INDIANAPOLIS, IN 46204	N/A Recipient's occupation N/A	\$ 21486
Purpose of expenditure IN-KIND TRAVEL		Date of expenditure 07/25/2018

Flight 11/27/2018

Contribution

Contributor's name, mailing address and ZIP code	Name of contributor's employer	Amount of contribution
IN-KIND - Spectacle Entertainment LLC 111 Monument Circle Ste. 777 Indianapolis, IN 46204 -	N/A Contributor's occupation N/A	\$ 33961
	Aggregate contributions year-to-date \$ 133961	Date of contribution 11/27/2018

Expenditure

Recipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of Expenditure
IN-KIND - Spectacle Entertainment, LLC 111 Monument Circle Ste. 777 Indianapolis, IN 46204 -	N/A Recipient's occupation N/A	\$ 33961
Purpose of expenditure IN-KIND; TRAVEL		Date of expenditure 11/27/2018