

SteppingStone Industries, Inc.
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2012 OCT 31 PM 2:01

OFFICE OF GENERAL
COUNSEL



Federal Election Commission
Attn: Office of General Counsel / Ruth Heilizer
999 E Street, NW
Washington, DC 20463
October 27, 2012
31 BSR

MUR # 6681

Complaint of Potentially Illegal Campaign Contribution – Third Notice

Dear Sir/Ma'am:

This complies with your October 24, 2012 request for a sworn statement made in the presence of the notary that the complaint is true and correct to the best of my knowledge. It is noted that my signature was notarized and stamped as is required by Virginia on the first and initial notice.

At the beginning of 2012 election year (in Virginia January), I began petitioning efforts as a way to keep my business going and to provide income for myself. The Jill Stein campaign for President is one of four clients for which I collected petition signatures for hire, which contributed to meeting Virginia's statutory petition signature ballot access requirements for the four candidates.

In Virginia the ballot access requirement for statewide office is quite high: 10,000 valid signatures with 400 from each of the 11 Congressional Districts. An ethical petitioner collecting more than 1000 signatures and with knowledge of ballot access requirements in Virginia would expect to travel to collect signatures to have a reasonable expectation that signatures collected for hire would contribute to meeting Virginia's statutory requirements. And, an experienced petitioner would know that they cannot collect in one day, nor in two weeks, all signatures required by Virginia statute.

I have 8 years of experience in collecting signatures in Virginia for independent and third party candidates. I established a rate of \$3.00 per signature as the "going" rate, with the expectation that signatures collected locally would off-set travel expenses for travel in other Congressional districts. I had knowledge of two local petitioners who were cooperatively collecting signatures in local districts and not likely to travel, so the majority of the signatures I collected required travel and the outlay of expenses associated with car rental, gas, insurance, lodging, food away from home, printing and incidentals expenses in order that signatures could reasonably be expected to contribute to obtaining ballot access in Virginia. In order to break even, I estimated that I would need to collect \$5.00 per signature due to the amount of travel required. I successfully negotiated \$3.00 per signature for one client and \$2.00 per signature for additional petitioning activity. One has paid promptly on a weekly

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Phone: 703-960-5602 or 571-282-8381 (C)

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basis; the other payed in lump sum. Both contracts were oral agreements. All expenses of travel were captured on SteppingStone Industries, Inc., business credit card account.

I advised the Virginia Green Party of my petitioning efforts (See Exhibit 1 dated Monday June 11, 2012) on their behalf and of my petitioning rate of \$3.00. I established \$3.00 for the Stein campaign as the rate because I had not allowed for payment of salary for my time, only for expenses of travel. An agreement was never finalized with the Stein campaign, but email correspondence (Exhibit 1) led me to believe that I could expect \$1 per signature from the VAGP (Audrey Clement) and I should get the other \$2.00 per signature from the Stein campaign (Exhibit 2 dated July 3, 1012). I provided signature count by Congressional District as requested by the VAGP Chair (Tom Yeager Exhibit 3 dated August 13, 2012). The collection efforts of myself and other petitioners was used to substantiate to the Stein campaign that with additional paid petitioners there was a reasonable expectation that Dr. Stein could gain access to the Virginia ballot. I also provided on August 22nd a copy of SteppingStone Industries, Inc's invoice to the VA GP and to the Stein campaign (Erika Wolfe) for 2,650 signatures with an amount due of \$7,755.00 (Exhibit 4). Work was performed March 2012 – July 2012 for the Stein campaign. No petitioning work was performed in August 2012 for which payment was expected.

At 10:04am on Friday, August 24 with petition signatures required to be filed by 12:00 noon (not presented by 12:00 noon, but FILED by 12:00 noon) in Richmond Virginia (a two hour commute from where I live) the Stein campaign called to negotiate payment and offered \$1.50 per signature plus expenses, provided expenses included receipts with location(s) of expenditures. I was unable to continue negotiations because of the short timeline required and because my mobile phone's battery was too low. The requirement for providing the locations of my expenditures for lodging and gas I consider proprietary information since the closely held location(s) of my petition collecting activities could be determined from this information and would have to have been provided at a later date in any case.

Despite the short timeline and because I left for Richmond at 8am vice waiting for the 10am phone call, I managed to present the petitions to the VAGP and to the Stein campaign in a timely manner. Dr. Stein was certified on the ballot by the Virginia State Board of Elections on Sep 4, 2012. Both the VAGP and the Stein campaign had my invoice when they accepted the petitions I presented. All concerned agree that the Stein campaign could not have filed timely without the signatures that I collected. I now expect payment for the services and have been told neither expects to pay me for this work and that the Stein campaign is hiring a personal assistant for Dr Stein and also for her running mate with the money they would have paid to SteppingStone Industries, Inc. At this time I am seeking legal council to handle the collection action but have been unable to retain legal council as

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