



Ivan Assenov
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2019 AUG -7 AM 9:43

MUR # 7633

August 1 2019

Office of General Counsel

Federal Election Commission
1050 First Street, NE
Washington, DC 20463

Via Paper

2019 AUG -8 AM 8:43
FEDERAL COUNSEL

To Whom It May Concern:

I would like to report several violations from TOM NORTON FOR CONGRESS (ID: C00704270) CAMPAIGN. There are several invoices that Scale Campaign sent to the campaign that were not logged, not reported and not paid.

I was Campaign manager for the campaign from the very beginning, including the exploratory committee time - from April 4 2019 until June 11 2019.

As was very clear to everyone on the campaign, including Mr. Thomas Norton that I will not work for free and have to be paid for my work. Also some third party vendors services paid by Scale Campaign were not logged and reported.

The invoices in question are :

<https://www.paypal.com/invoice/p/#TUXQYH4GFUL8L6WQ>

<https://www.paypal.com/invoice/p/#4LFRCY6SX7APAJX4>

<https://www.paypal.com/invoice/p/#Z5HAUVZNW5FWHNNZ>

<https://www.paypal.com/invoice/p/#XTYN2UWQQBM6UVZJ>

<https://www.paypal.com/invoice/p/#4LT8BKX3GFGH3K54>



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Total amount of not reported invoices from Scale Campaign invoices is \$10,574.88.

Below is a screenshot of my communication with the accounting company doing the treasurer work for Norton's campaign.

On June 13, 2019 at 10:10 PM Cabell Hobbs <cabell@complianceconsultingva.com> wrote:

Thanks Ivan. Kevin forwarded me your invoices.
I'm supposed to speak with Tom tomorrow. I'm hopeful to get clarity on the situation.

Thanks
Cabell

Sent from my iPhone

On Jun 13, 2019, at 8:25 PM, Ivan Assenov <ivan@scalecampaign.com> wrote:

Cabell, Jeff,
I was told that Kevin Gardner is no longer involved with Tom Norton for Congress. Previously I had sent him the invoices but not sure if he processed them.
I do not know who is running the campaign at this point, but I do know that you are involved as treasurers.
I am attaching invoices again here that are outstanding and needs to be paid.
Can you register the invoices with the campaign and talk to whoever runs the campaign so the invoices need to be paid.
They are due on receipt.

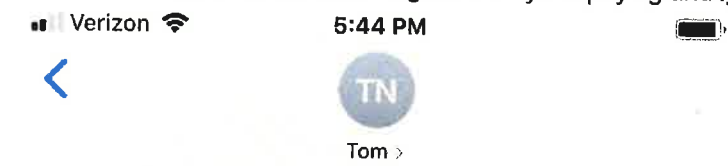
Regards
Ivan

I had sent numerous emails, phone calls and initiated chats via social media to reach Mr. Norton and his treasurer Mr. Jeff Fuss since then.



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Mr. Norton tried to do his usual negotiation by not paying and ignoring it.



Mon, Jul 1, 6:54 PM

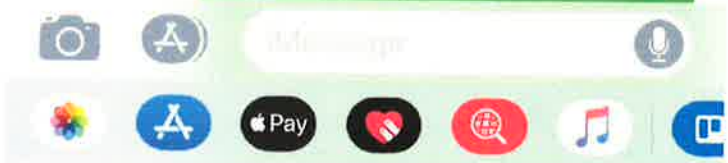
Tom, I have not seen payments from your side on my invoices.

Can you clarify as last I remember you said you will pay

Mon, Jul 1, 11:09 PM

we were going to negotiate which im fine with doing. just slapping with a mass invoice isnt right. i need some type of agreement from you back and forth with something that isnt slapping with a mass invoice. or surprising us on the price

There are 5 concrete invoices
Not one.





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During the period as Campaign manager I had to deal with another similar issue where the legal counsel to the campaign had sent two invoices each \$3000 to be logged and paid. From the public listings as of today those are not logged either:

https://www.fec.gov/data/disbursements/?committee_id=C00704270&two_year_transaction_period=2020&cycle=2020&line_number=F3-17&data_type=processed

To the best of my knowledge Mr. Norton ignored those for long time and later got involved into some negotiations with the already former legal counsel.

I would like Scale Campaign invoices to be logged properly into the FEC filings as they represent valid work done by me/my company.

X

Ivan Assenov
Scale Campaign, member

The complaint by Ivan Assenov, was signed and sworn, under penalty of perjury, before me on this 1st day of August, 2019.

CONNOR DECOU
Notary Public - State of Michigan
County of Kent
My Commission Expires Jul 16, 2025
Acting in the County of Kent