



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

January 11, 2015

JAMES F. BRASWELL, TREASURER  
PERDUE FOR SENATE  
3110 MAPLE DRIVE NE SUITE 400  
ATLANTA, GA 30305-2650

**Response Due Date**  
**02/17/2015**

IDENTIFICATION NUMBER: C00547570

REFERENCE: OCTOBER QUARTERLY REPORT (07/03/2014 - 09/30/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Senate Public Records Office by the response date noted above. Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following **8** item(s):

1. Schedule A of your report discloses one or more contributions that appear to be from a corporation(s) and/or labor organization(s) (see attached). 52 U.S.C. § 30118(a) (formerly 2 U.S.C. § 441b(a)) and 11 CFR § 103.3(b) prohibit the receipt of contributions from corporations and labor organizations unless made from separate segregated funds established by the corporations and labor organizations.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information.

If you have received prohibited contributions, you must make a refund within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(1) and (2))

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B supporting Line 20(a) of the report covering the period in which the refund is made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the

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acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

2. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached).

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$2,600 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (52 U.S.C. § 30116(a) and (f) (formerly 2 U.S.C. § 441a(a) and (f)); 11 CFR § 110.1(b), (e) and (k))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

Excessive contributions may be retained if, within 60 days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below.

For reattributions, excessive contributions from individuals can be retained if, within 60 days of receipt, the excessive amount is properly reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

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For redesignations, the funds can be retained if, within 60 days of receipt, the excessive amount is properly redesignated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) your committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt of the contribution, the excessive amount must be refunded. See 11 CFR § 103.3(b)(1).

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 20(a), (b), or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund, redesignate, and/or reattribute the excessive amount will be taken into consideration.

**3.** Schedule A of your report discloses one or more contributions that appear to be from limited liability corporation(s) (LLC) (see attached). 11 C.F.R. §110.1(g) allows the receipt of contributions from LLCs providing the LLC is

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treated as a partnership for tax purposes, and has not elected to be treated as a corporation by the Internal Revenue Service (IRS). Both LLCs that claim corporate status and those that publicly traded would be treated as corporations for FECA purposes.

Please amend your report to clarify if the LLCs in question are treated as partnerships. If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information.

If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(2))

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B supporting Line 20(a) of the report covering the period in which the refund was made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

**4.** Schedule A of your report indicates that your committee may have failed to file one or more of the required 48-hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-Runoff Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. (11 CFR § 104.5(f))

If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information.

**5.** Commission Regulations require that a committee discloses the

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identification of all individuals who contribute in excess of \$200 in an election cycle. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The attached employer and occupation entries appear on your report and are not considered acceptable.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

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Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

**6.** Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 17 of your report to clarify the following description(s): "Blank," "Event Expense," and "See Below." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(4)(i)(A).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register is available on the FEC website at [www.fec.gov/law/policy/purposeofdisbursement/inadequate\\_purpose\\_list\\_3507.pdf](http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf). A non-exhaustive list of acceptable purposes is also available on the FEC website at <http://www.fec.gov/rad/pacs/documents/ExamplesofAdequatePurposes.pdf>.

**7.** Schedule B of your report discloses disbursements to ADP Payroll Services for "Payroll Expense(s)". Please be advised that when itemizing disbursements to companies for payroll services, if the payment to the salary recipient aggregates in excess of \$200 in an election cycle, a memo entry including the name and address of the individual receiving the salary, as well as the date, amount, and purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (11 CFR § 104.9)

**8.** Schedule B of your report discloses reimbursements to individuals for the following travel-related disbursement(s): "Perkins, George 9/5/14 \$700.00 Reimbursement for Travel." When the reimbursement amount to individuals for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to any one vendor aggregate in excess of \$200 for the election cycle, the staff advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount, and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

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**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

A written response or an amendment to your original report(s) correcting the above problems should be filed with the Senate Public Records Office. Please contact the Senate Public Records Office at (202) 224-0322 for instructions on how and where to file an amendment. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1395.

Sincerely,



Ben Holly  
Senior Campaign Finance Analyst  
Reports Analysis Division

**Excessive, Prohibited, and Impermissible Contributions  
Perdue for Senate (C00547570)**

**Excessive Contributions from Individuals**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>	<b>Memo</b>
Addison, John A.	8/22/14	\$2,600.00	G2014	
Addison, John A.	9/30/14	\$2,100.00	G2014	
Aderhold, Kay	9/30/14	\$2,600.00	G2014	
Aderhold, Kay	9/30/14	\$2,400.00	G2014	
Aderhold, Thomas	9/30/14	\$2,400.00	G2014	
Aderhold, Thomas	9/30/14	\$2,600.00	G2014	
Argenbright, Kathleen Blythe Mrs.	7/5/14	\$2,552.50	G2014	
Argenbright, Kathleen Blythe Mrs.	8/18/14	\$2,600.00	G2014	
Atkins, Sarah	9/30/14	\$5,200.00	G2014	
Bennett, Trisha Ms.	9/30/14	\$5,200.00	G2014	
Busch, August	9/30/14	\$5,000.00	G2014	
Camp, Elizabeth W. Mrs.	6/4/14	\$400.00	G2014	
Camp, Elizabeth W. Mrs.	9/10/14	\$2,600.00	G2014	
Campbell, Ellen Kay Mrs.	9/5/14	\$5,200.00	G2014	
Campbell, Kirby J. Mr.	9/5/14	\$5,200.00	G2014	
Colton, Jeri	9/19/14	\$5,000.00	G2014	
Colton, Steven	9/19/14	\$5,000.00	G2014	
Crider, Ann	9/3/14	\$6,300.00	G2014	
Drapeau, Mike	9/22/14	\$5,200.00	G2014	
Edenfield, James Michael	8/6/14	\$5,200.00	G2014	
Edenfield, Norma Mrs.	3/13/14	\$1,153.13	G2014	
Edenfield, Norma Mrs.	8/6/14	\$2,600.00	G2014	



**Excessive, Prohibited, and Impermissible Contributions  
Perdue for Senate (C00547570)**

Ellis, Jim Mr.	9/20/14	\$5,200.00	G2014
Gillin, John	8/19/14	\$5,200.00	G2014
Griffith, G. Sanders Mr. III	9/30/14	\$5,000.00	G2014
Grimes, Scott Mr.	9/24/14	\$3,750.00	G2014
Hines, Jan	9/29/14	\$1,000.00	G2014
Hines, Jan	9/30/14	\$3,000.00	G2014
Hoover, Drada P. Ms.	9/30/14	\$5,200.00	G2014
Hoover, Duane L. Mr.	9/30/14	\$5,200.00	G2014
Hoover, Duane Mr. Jr.	9/30/14	\$5,200.00	G2014
Humphreys, David C. Mr.	9/26/14	\$2,600.00	G2014
Humphreys, David C. Mr.	9/26/14	\$2,600.00	G2014
Jackson, Kevin Mr.	8/22/14	\$7,800.00	G2014
Jackson, Richard L. Mr.	8/28/14	\$7,800.00	G2014
Jarvis, John Mr.	8/6/14	\$2,600.00	G2014
Jarvis, John Mr.	8/6/14	\$2,600.00	G2014
Klarman, Seth	8/28/14	\$5,200.00	G2014
Laube, Lynne M. Mrs.	9/24/14	\$3,750.00	G2014
Ledbetter, Scott Mr.	7/28/14	\$2,600.00	G2014
Ledbetter, Scott Mr.	9/26/14	\$2,600.00	G2014
Levy, Robert	9/30/14	\$5,200.00	G2014
Loeffler, Kelly	8/5/14	\$2,600.00	G2014
Loeffler, Kelly	9/23/14	\$5,200.00	G2014
Marcus, Bernard Mr.	9/11/14	\$2,600.00	Primary Runoff 2014
Marcus, Bernard Mr.	9/11/14	\$2,600.00	Primary Runoff 2014

**Excessive, Prohibited, and Impermissible Contributions  
Perdue for Senate (C00547570)**

Mathis, Benton J. Mr. Jr.	8/15/14	\$7,800.00	G2014
McMullan, John Mr.	9/11/14	\$2,600.00	G2014
McMullan, John Mr.	9/11/14	\$2,600.00	G2014
Morgan, Bartow	8/19/14	\$5,200.00	G2014
Nims, Jerry C. Mr.	9/19/13	\$1,000.00	P2014
Nims, Jerry C. Mr.	9/29/14	\$2,600.00	P2014
Noble, Jim	9/25/14	\$5,200.00	G2014
Owens, Gregory J. Mr.	2/19/14	\$500.00	Primary Runoff 2014
Owens, Gregory J. Mr.	7/9/14	\$2,600.00	Primary Runoff 2014
Panton, David Mr.	8/19/14	\$5,200.00	G2014
Park, Sunny K. Mr.	6/11/14	\$1,900.00	G2014
Park, Sunny K. Mr.	8/12/14	\$2,600.00	G2014
Powers, George	9/30/14	\$5,200.00	G2014
Quattromani, Michael A.	8/20/14	\$5,200.00	G2014
Raborn, Francis	9/30/14	\$5,200.00	G2014
Rado, Bruce	8/4/14	\$2,600.00	G2014
Rado, Bruce	9/29/14	\$2,000.00	G2014
Rollins, Margaret	9/20/14	\$7,800.00	G2014
Rosebrough, Walter Mr.	8/1/14	\$5,200.00	G2014
Rowling, Robert	8/29/14	\$5,200.00	G2014
Rowling, Terry	8/29/14	\$5,200.00	G2014
Sands, George W. Mr.	8/15/14	\$2,600.00	G2014
Sands, George W. Mr.	9/22/14	\$1,000.00	G2014
Saul, Andrew	9/24/14	\$5,200.00	G2014

**Excessive, Prohibited, and Impermissible Contributions  
Perdue for Senate (C00547570)**

Sedwick, Linda L. Mrs.	8/28/14	\$5,200.00	G2014
Smith, Joan W.	8/6/14	\$5,000.00	G2014
Smith, Richard F. Mr.	8/6/14	\$5,000.00	G2014
Snodgrass, John Mr.	8/28/14	\$5,200.00	G2014
Sprecher, Jeffrey	8/5/14	\$2,600.00	G2014
Sprecher, Jeffrey	9/23/14	\$5,200.00	G2014
Stanard, James	9/28/14	\$7,800.00	G2014
Stelling, Carol	9/30/14	\$5,000.00	G2014
Stelling, Kessel	9/30/14	\$5,000.00	G2014
Strange, J. Terry	9/30/14	\$5,200.00	G2014
Sutterfield, Meade	9/19/14	\$2,600.00	G2014
Sutterfield, Meade	9/25/14	\$2,600.00	G2014
Tarbutton, Charles	9/30/14	\$5,200.00	G2014
Thayer, John P. Mr.	9/30/14	\$1,000.00	G2014
Thayer, John P. Mr.	9/30/14	\$2,000.00	G2014
Thomas, Robert	9/9/14	\$2,600.00	G2014
Thomas, Robert	9/9/14	\$2,600.00	G2014
Tomlinson, Philip W. Mr.	9/23/14	\$2,600.00	G2014
Tomlinson, Philip W. Mr.	9/30/14	\$5,000.00	G2014
Wells, Leo F. Mr. III	8/8/14	\$7,800.00	G2014
White, Susan Mrs.	5/21/14	\$2,400.00	G2014
White, Susan Mrs.	7/23/14	\$2,600.00	G2014
Wilkinson, Beverly	9/30/14	\$5,000.00	G2014
Wilkinson, Jerry	9/30/14	\$5,000.00	G2014

**Excessive, Prohibited, and Impermissible Contributions  
Perdue for Senate (C00547570)**

Williams, D. Richard	7/30/14	\$2,600.00	G2014	
Williams, D. Richard	9/30/14	\$2,100.00	G2014	
Winchester, Gayle C.	8/1/14	\$5,200.00	G2014	
Windolf, Jack	9/8/14	\$5,200.00	G2014	
Windolf, Muriel	9/8/14	\$5,200.00	G2014	
Woods, M. Troy	9/30/14	\$5,000.00	G2014	
Wymer, John F. Mr. III	6/5/14	\$1,000.00	Primary Runoff 2014	
Wymer, John F. Mr. III	6/26/14	\$1,000.00	Primary Runoff 2014	
Wymer, John F. Mr. III	7/16/14	\$1,000.00	Primary Runoff 2014	
Yancey, James D. Mr.	8/5/14	\$5,200.00	G2014	
Yancey, James D. Mr.	8/21/14	-\$2,600.00	G2014	X
Yancey, James D. Mr.	8/21/14	\$2,600.00	P2014	X
Yancey, James	9/30/14	\$5,200.00	G2014	
Young, Paul	9/17/14	\$7,800.00	G2014	

**Excessive Contributions from Committees**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>	<b>Memo</b>
21st Century Majority Fund	7/24/14	\$5,000.00	G2014	
21st Century Majority Fund	9/30/14	\$5,000.00	G2014	

**Contributions from Possible Prohibited Entities**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>	<b>Memo</b>
ATC Broadband, LLC	9/11/14	\$1,000.00	G2014	
Due South Investments, LLC	9/17/14	\$1,000.00	G2014	
Gayco Holdings LLC	9/8/14	\$1,000.00	G2014	
Integra Developer Services	9/3/14	\$250.00	G2014	
J. Morgan Trading Company	9/11/14	\$250.00	G2014	
JIAO LLC	7/10/14	\$2,500.00	Primary Runoff 2014	
P.D. Miller Farms, LLC	9/5/14	\$250.00	G2014	

**Missing 48-Hour Notices  
Perdue for Senate (C00547570)**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>
O'Brien, D. Kerry Kerry Mr.	7/3/14	\$2,600.00	Primary Runoff 2014
Argenbright, Kathleen Blythe Mrs.	7/5/14	\$2,552.50	G2014
Voyles, Robert P.	7/7/14	\$1,000.00	Primary Runoff 2014

**Inadequate Employer/Occupation Entries  
Perdue for Senate (C00547570)**

<b>Employer</b>	<b>Occupation</b>
Amatek	Information Requested
Blank	Blank
General Electric Co.	Information Requested
Information Requested	Board of Economic Development
Information Requested	Chairman & CEO
Information Requested	Commission for a New Georgia
Information Requested	Information Requested
N/A	N/A
None	None
Self	Business
Self	Manager
Self	Self
Self	Self-Employed
Self-Employed	Business Owner
Self-Employed	CEO
Self-Employed	CFO
Self-Employed	Facilitator
Self-Employed	Self-Employed
Walter Street Capital	Information Requested