



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

November 22, 2020

BRADLEY T. CRATE, TREASURER  
PERDUE FOR SENATE  
PO BOX 12077  
ATLANTA, GA 30355-2077

**Response Due Date**  
**12/28/2020**

IDENTIFICATION NUMBER: C00547570

REFERENCE: AMENDED OCTOBER QUARTERLY REPORT (07/01/2020 - 09/30/2020),  
RECEIVED 10/19/2020

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. **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 3 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. The Commission notes your additional explanation regarding the committee's corrective action taken for all of these contributions.

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 \$2,800 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 from an organization(s) which is not a political committee registered with the Commission (see attached). The Commission notes your additional explanation regarding the committee's corrective action taken for all of these contributions. In order for your committee to accept contributions from unregistered

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organizations, your committee should take steps to ensure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 52 U.S.C. §§ 30116(f) and 30118 (formerly 2 U.S.C. §§ 441a(f) and 441b) or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: (1) establish a separate account which contains only those funds permitted under the Act, or (2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

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(b) or (c), as applicable, 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.

**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.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For information about the report review process or specific filing information for your committee type, please visit

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[www.fec.gov/help-candidates-and-committees](http://www.fec.gov/help-candidates-and-committees). For more information about Requests for Additional Information (RAI), why you received a letter, and how to respond, please visit [www.fec.gov/help-candidates-and-committees/request-additional-information](http://www.fec.gov/help-candidates-and-committees/request-additional-information). Should you 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) 694-1161.

Sincerely,

A handwritten signature in black ink that reads "Michael Dobi". The signature is written in a cursive, slightly slanted style.

Michael Dobi  
Sr. Campaign Finance & Reviewing Analyst

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

**Apparent Excessive Contributions from Individuals**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>
Allen, J David	10/21/19	\$2,800.00	G2020
Allen, John D	9/24/20	\$500.00	G2020
Allgood, Jimmy Mr.	3/31/19	\$2,800.00	G2020
Allgood, Jimmy	8/7/20	\$2,800.00	G2020
Brauer, Stephen F Mr. Q	3/6/19	\$2,800.00	G2020
Brauer, Stephen F	9/29/20	\$2,800.00	G2020
Canakaris, Vicki Ms.	11/6/19	\$2,200.00	G2020
Canakaris, Vickie	9/30/20	\$2,500.00	G2020
Casey, Gary Mr	6/22/20	\$1,000.00	G2020
Casey, Gary	9/3/20	\$1,800.00	G2020
Casey, Gary	9/9/20	-\$1,800.00	G2020
Casey, Gary	9/17/20	\$1,800.00	G2020
Casey, Gary	9/30/20	\$1,000.00	G2020
Coors, Jeffrey H.	6/30/19	\$2,800.00	G2020
Coors, Jeffrey H.	9/15/20	\$2,800.00	G2020
Edenfield, Norma Mrs	3/13/19	\$600.00	G2020
Edenfield, Norman	3/20/19	\$2,800.00	G2020
Edenfield, Norma Mrs	3/20/19	-\$200.00	G2020
Glover, J. L. Jr.	4/23/19	\$2,800.00	G2020
Glover, J L Jr	8/6/20	\$5,600.00	G2020
Glover, J L Jr	8/6/20	-\$2,800.00	G2020
Hines, Jan C	2/20/19	\$1,300.00	G2020
Hines, Jan C	3/20/19	\$100.00	G2020
Hines, Jan C	3/20/19	\$1,400.00	G2020
Hines, Jan C	8/31/20	\$250.00	G2020
Nicholson, David J	8/15/20	\$833.33	G2020
Nicholson, David J	9/12/20	\$1,900.00	G2020
Nicholson, David J	9/20/20	\$600.00	G2020

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

Pearson, Eugene	11/11/19	\$1,600.00	G2020
Pearson, Eugene Jr	7/21/20	\$2,800.00	G2020
Stanford, Samuel W Mr.	5/20/20	\$450.00	G2020
Stanford, Sam	7/16/20	\$2,800.00	G2020
Stonecipher, Nancy	5/11/20	\$2,200.00	G2020
Stonecipher, Nancy	9/11/20	\$2,800.00	G2020
Valach, Ken	8/20/20	\$2,800.00	G2020
Valach, Ken	9/10/20	\$2,800.00	G2020
Wintersteen, Jim Mr.	4/26/19	\$2,200.00	G2020
Wintersteen, James	7/20/20	\$2,500.00	G2020

**Apparent Excessive Contributions from Committees**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>
Consumer Bankers Association Political Action Committee, The	9/30/19	\$1,000.00	G2020
Consumer Bankers Association Political Action Committee, The	9/30/20	\$5,000.00	G2020
Dentons US LLP PAC	5/23/18	\$2,000.00	G2020
Dentons US LLP PAC	3/20/19	\$1,000.00	G2020
Dentons US LLP PAC	6/30/19	\$2,000.00	G2020
Dentons US LLP PAC	8/17/20	\$2,000.00	G2020
IHG Owners Association Inn-Pac	3/20/19	\$2,700.00	G2020
IHG Owners Association Inn-Pac	8/6/20	\$2,500.00	G2020
Zeneca Inc. Political Action Committee	5/23/18	\$500.00	G2020
Zeneca. Inc. Political Action Committee (Azpac)	6/30/19	\$1,500.00	G2020
Zeneca. Inc. Political Action Committee (Azpac)	3/30/20	\$1,500.00	G2020
Zeneca. Inc. Political Action Committee (Azpac)	6/30/20	\$1,500.00	G2020
Zeneca. Inc. Political Action Committee (Azpac)	9/30/20	\$1,500.00	G2020

**Contributions from Possible Prohibited Entities**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>
14 Gauge LLC	9/14/20	\$250.00	G2020
ESE Holdings LLC	9/14/20	\$2,800.00	G2020

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

**Contributions from Possible Unregistered Organizations**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>
The Committee To Elect Andy Welch Inc	9/30/20	\$500.00	G2020