

2004 MAR 21

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Federal Election Commission  
Attention: Complaints Division  
999 E Street, NW  
Washington, DC 20463

**SENSITIVE**

MUR # 5419

Dear Sir or Madam:

My name is Tawanna Wright and I am the campaign manager for Artur Davis for United States Congress. This letter stands as a formal complaint against Mr. Albert Turner, Jr.; the Perry County Civic League; and the heretofore unnamed corporation, limited liability corporation, or limited liability partnership operating as a lobbying entity of which Mr. Albert Turner, Jr. is a principal or partner, for violations of the Bipartisan Campaign Reform Act of 2002 (hereinafter "BCRA") and other campaign finance laws. The essential facts supporting this complaint were personally observed by me and are beyond dispute. They are as follows:

On Sunday, February 15, 2004, at Marion Baptist Academy Auditorium in Marion, Alabama, Perry County's annual Jimmy Lee Jackson Observance Day was held to honor the memory of Mr. Jackson, whose violent death in February, 1965 at the hands of Alabama State Troopers led to the historic Selma to Montgomery march for civil rights. Approximately 50 people attended the event. The Observance was sponsored by the Perry County Civic League<sup>1</sup> (hereinafter, the "League"), which has historically carried out certain quasi-political functions, including the endorsement and support of candidates for state and local office. Mr. Turner's father was a long-time president of the Perry County Civic League, and Mr. Turner, Jr. is member of the League.

In attendance at the Observance were several state and local elected officials, including Mr. Albert Turner Jr. (Perry County Commissioner), Mr. Johnny Flowers (Perry County Commissioner), Mr. Bobby Singleton (Alabama House of Representatives, District 72), Mr. Charles Steele (Alabama House of Representatives, District 24), and Mr. Hank Sanders (Alabama Senate, District 23). Several of these elected officials were invited to speak at this event.

During Mr. Turner's address, he announced his candidacy for the Seventh Congressional Seat of Alabama as a Democrat. Thereafter, Mr. Turner reminded the crowd that such campaigns "cost money", and that contributions are needed to sustain his candidacy.

Mr. Turner followed this comment by brandishing two checks made out to the Perry County Civic League: one in the amount of \$10,000 from "his lobbying firm" (the Firm

<sup>1</sup> A search of Alabama's corporate records reveals that the League is not registered as a corporation or partnership of any kind. Its corporate and tax structure is therefore indeterminate.

was not named) and the second in the amount of \$5,000, from a Mr. Milton McGregor, an individual known by me to be a lobbyist in Montgomery and Tuskegee, Alabama. Mr. Turner suggested that these funds would go toward the financial support of the candidate for the Seventh Congressional District seat endorsed by the Perry County Civic League.

Mr. Turner then made a request to the gathered crowd for additional cash donations to the Perry County Civil League that would go toward this political purpose. He then passed a "collection plate" for such donations.

An undisclosed amount of money, in addition to the \$15,000 in initial contributions was collected from the crowd to be used to support Perry County Civic League's political activities and, presumably, Mr. Turner, Jr.'s eventual candidacy for the Seventh Congressional District seat.

The apparent violations are as follows:

Coordination between an announced candidate for federal elected office (Mr. Turner, Jr.) and a quasi-political organization (the League) to collect contributions that do not meet the federal statutory definition of a permissible political contribution:

The explicit solicitation of soft-money contributions for an organization likely not qualified or eligible to receive federal election contributions.

Explicit political activities and acceptance of political contributions by a (potentially) non-profit organization;

Explicit political activities related to a federal campaign by an organization not registered with the Federal Election Commission;

Solicitation of political contributions on the premises of a non-profit tax exempt organization, the Marion Baptist Academy; and

Political contributions made by a corporation or similar entity (Mr. Albert Turner's unnamed "lobbying firm", which is not registered either with the Federal Election Commission, nor with the election Commissions of Alabama nor Georgia, the two states where Mr. Turner purports to be a registered lobbyist).

Although Mr. Turner has not yet registered as a candidate for the Seventh Congressional District seat, the Commission has the authority to take enforcement action based on a complaint where it finds reason to believe that a person "has committed, or is about to commit" a violation of the law.

The evidence set forth above makes clear that the overriding purpose of collecting the funds in question was to support the candidacy of Mr. Albert Turner Jr. for Alabama's Seventh Congressional District Seat. I am filing this complaint and requesting an immediate investigation. I can be reached 205 542-0399.

Sincerely,

*Jawanna R Wright*

Subscribed and sworn this 26<sup>th</sup> day of February, 2004.

State of Alabama

Notary Public *A. Dapton P. Bone*

My commission expires: *6-27-05*

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FEDERAL ELECTION COMMISSION  
Washington, DC 20463

**SENSITIVE**

**MEMORANDUM**

**TO:** The Commission

**FROM:** Office of the Commission Secretary 

**DATE:** March 2, 2004

**SUBJECT:** MUR 5419 - Complaint

The attached document is being circulated for your information.

**Attachment**

24.19.023.2919