

RAD REFERRAL #: A15-01

DATE: March 18, 2015

ANALYST: Carolina Mongeon

REPORTS ANALYSIS DIVISION AUDIT REFERRAL

I. CANDIDATE: David Perdue
CANDIDATE ID NUMBER: S4GA11285
STATE/DISTRICT: GA

II. PRINCIPAL CAMPAIGN COMMITTEE: Perdue for Senate
C00547570
Paul Kilgore, Treasurer (1/12/15 - Present)
James F. Braswell, Treasurer (7/24/13 - 1/11/15)
3110 Maple Drive NE
Suite 400
Atlanta, GA 30305-2650

OTHER AUTHORIZED COMMITTEE(S): Conservative Action Fund
Cassidy Perdue Sullivan Tillis Victory Fund (CPST Victory Fund)
Founders Senate Candidate Committee
Senate Battleground Fund¹

III. REGISTRATION DATE: July 24, 2013
DATE OF CANDIDACY: August 22, 2013

IV. ELECTION RESULTS: Won the 2014 General Election by 7.68%

V. TOTAL POINTS ASSESSED:

VI. SUMMARY OF AUDIT POINTS BY STANDARD:

Standard	#	Description
Standard	5	Excessive, Prohibited and Other Impermissible Contributions and Transfers
Standard	7	Failure to Provide Schedules
Standard	8	Failure to Properly Itemize Contributions from Individuals
Standard	11	Failure to Properly Itemize Disbursements
	TOTAL	

¹ The Committee disclosed transfers from Cassidy Perdue Sullivan Tillis Victory Fund (CPST Victory Fund), Founders Senate Candidate Committee, and Senate Battleground Fund on the 2014 October Quarterly Report, covering 7/3/14-9/30/14. However, the Committee did not disclose these joint fundraising representatives on its Statement of Organization (FEC Form 1) until the 12/4/14 Amended Form 1.

VII. NOTICES SENT TO AND RESPONSES RECEIVED FROM THE COMMITTEE:

See attached O-Index for the Committee.

VIII. PROBLEMS FOR WHICH AUDIT POINTS WERE ASSESSED:

A. Standard 5 – Excessive, Prohibited and Other Impermissible Contributions/Transfers:

Report Type	Violation (Description)
2014 Q3	Schedule A of the Committee's report disclosed the receipt of excessive contributions totaling \$177,505.63 or 3.75% of the Committee's total contributions (Line 11(e), Column A of the Detailed Summary Page). These contributions were received from sixty-eight (68) individuals and one (1) qualified multicandidate committee.
2014 12G	Schedule A of the Committee's report disclosed the receipt of excessive and prohibited contributions totaling \$29,850.00 or 2.07% of the total contributions (Line 11(e), Column A of the Detailed Summary Page). These contributions were received from thirteen (13) individuals and one (1) non-federal committee.
2014 30G	<p>The Committee's report contained excessive and prohibited contributions totaling \$78,600.00 or 4.85% of the total contributions (Line 11(e), Column A of the Detailed Summary Page), as detailed below:</p> <p>Schedule A of the Committee's report disclosed the receipt of excessive and prohibited contributions totaling \$76,600.00 or 4.72% of the total contributions (Line 11(e), Column A of the Detailed Summary Page). These contributions were received from twenty-seven (27) individuals, one (1) LLC, and two (2) qualified multicandidate committees.</p> <p>Schedule A of the Committee's report disclosed the receipt of a contribution from an individual with a foreign address totaling \$2,000.00 or 0.12% of the Committee's total contributions (Line 11(e), Column A of the Detailed Summary Page). This contribution was received from one (1) individual.</p>

B. Standard 7 - Failure to Provide Supporting Schedules:

Report Type	Violation (Description)	P
2014 12R ²	The Committee failed to file the required 48-Hour Notices from May 1, 2014 through May 17, 2014 for contributions totaling \$4,000.00 from three (3) individuals.	
2014 Q3	The Committee failed to file the required 48-Hour Notices from July 3, 2014 through July 19, 2014 for contributions totaling \$6,152.50 from three (3) individuals.	
2014 30G	<p>The Committee failed to provide supporting schedules totaling \$57,200.00, as detailed below:</p> <p>The Committee filed 48-Hour Notices during the October 16, 2014 through November 1, 2014 period for contributions totaling \$7,200.00 from three (3) individuals that were not disclosed on Schedule A.</p> <p>Schedule B of the Committee's report disclosed a loan repayment totaling \$50,000.00. However, Schedule C did not disclose any loan repayments, resulting in a missing schedule of \$50,000.00.</p>	

C. Standard 8 - Failure to Properly Itemize Contributions from Individuals:

Report Type	Violation (Description)
2014 Q3	The Committee failed to provide the adequate identification for 610 of 2718, or 22.44%, of the contributions from individuals that require itemization.
2014 12G	The Committee failed to provide the adequate identification for 213 of 712, or 29.92%, of the contributions from individuals that require itemization.

² The committee was required to file a 2014 12 Day Pre-Runoff Report. The committee filed this report, with the correct coverage dates, but labeled it a 2014 12 Day Pre-Primary Report. This report is referenced in the referral as the 12R to distinguish it from the regularly filed 12P.

D. Standard 11 – Failure to Properly Itemize Disbursements:

Report Type	Violation (Description)
2014 Q3	<p>The Committee's report failed to properly itemize disbursements totaling \$77,741.93, as detailed below:</p> <p>The Committee failed to provide an adequate purpose for disbursements to eleven (11) vendors and twenty-seven (27) individuals totaling \$77,041.93.</p> <p>The Committee failed to provide original vendor information for a travel reimbursement to one (1) individual for \$700.00.</p>
2014 30G	<p>The Committee's report failed to properly itemize disbursements totaling \$63,800.37, as detailed below:</p> <p>The Committee failed to provide an adequate purpose for disbursements to three (3) vendors and one (1) individual totaling \$23,310.07.</p> <p>The Committee failed to provide original vendor information for staff reimbursements to three (3) individuals totaling \$8,381.42.</p> <p>The Committee failed to provide original vendor information for travel reimbursements to six (6) individuals totaling \$32,108.88.</p>

XI. MATTERS REQUIRING REFERRAL TO OGC/ADRO:

A. OGC –

Excessive, Prohibited and Other Impermissible Contributions or Transfers (Standard 5)

The Committee can be referred to the Office of General Counsel (OGC) for the apparent receipt of excessive and impermissible contributions totaling \$203,250.00 and 1.65% of the Committee's total contributions during the 2014 election cycle.

B. ADRO –

**Excessive, Prohibited and Other Impermissible Contributions or Transfers
(Standard 5)**

The Committee can be referred to the Alternative Dispute Resolution Office (ADRO) for the apparent receipt of excessive and impermissible contributions totaling \$300,955.63 and 2.44% of the Committee's total contributions during the 2014 election cycle.

Failure to Provide Supporting Schedules (Standard 7)³

The Committee can be referred to ADRO for amending its 2014 October Quarterly Report to disclose additional newly incurred debts totaling \$81,262.46.

The Committee can be referred to OGC for amending its 2014 30 Day Post-General Report to disclose additional newly incurred debts totaling \$288,896.95.

X. OTHER COMMISSION ACTIONS DURING THE 2011-2012 AND 2013-2014 ELECTION CYCLES:

None.

XI. OTHER RELEVANT INFORMATION:

The Committee filed amendments to the 2014 October Quarterly, 12 Day Pre-General, and 30 Day Post-General Reports on March 2, 2015. RAD will review these amendments after their coding is completed and update the Audit Division on any further RFAIs sent. Limited review of the amendments to the 2014 October Quarterly and 30 Day Post-General Reports revealed potential violations under Standard 7 (Failure to Provide Missing Schedules), for which RFAIs were sent to the Committee on March 11, 2015, with the response due dates of April 15, 2015. These potential violations are not included in this referral.

The Committee reported receipt of contributions designated for the 2014 General Runoff Election, which did not occur, on the Amended 2014 12 Day Pre-General and 30 Day Post-General Reports. The permissible timeframe for remedying these contributions falls during the coverage period of the 2014 Year-End Report; thus the review of the 2014 Year-End Report will include possible citation for any remaining funds designated to the 2014 General Runoff Election.

³ RFAIs were sent to the Committee on 3/11/15, referencing the increased activity on the Amended 2014 October Quarterly and 30 Day Post-General Reports.

Cmte. Type: S (SENATE) Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE)										Filing Frequency: QUARTERLY FILER							
Form	Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Dsb	End Cash	Debts	Loans	Debts & Loans	
MS-T				2/16/2015	167	15020107190											
MS-T				2/18/2015	46	15020107431	10/5/2014	11/24/2014									
F1			A	1/12/2015	7	15020032977											
F2			N	1/12/2015	3	15020032872											
F6			N	2/18/2015	15	15020107505											
F6			N	2/18/2015	28	15020107477											
F2			A	2/24/2015	4	15020107695											
Totals										\$0				\$0			

Cmte. ID: C00547570 Cmte. Name: PERDUE FOR SENATE										Filing Frequency: QUARTERLY FILER							
Treasurer Name: PAUL KILLGORE Address: 3110 MAPLE DRIVE NE SUITE 400, ATLANTA, GA 30305-2650																	
Form	Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Dsb	End Cash	Debts	Loans	Debts & Loans	
MS-T				9/27/2013	6	13020461845											
MS-T				9/27/2013	7	13020413178											
MS-J				9/22/2014	5	14031291197											
MS-T				10/3/2014	4	14020741306											
MS-T				10/6/2014	4	14020740988											
RO1			N	8/26/2013	2	13330037961											
RQ2	Q3		N	2/3/2014	3	14330042825	5/14/2013	9/30/2013	2/3/2014								
RQ2	Q1		N	5/28/2014	2	14330052977	1/1/2014	3/1/2014	5/28/2014								
RQ2	12P	N		8/29/2014	3	14330060291	5/1/2014	7/2/2014	8/29/2014								
RO2	Q3	N	N	1/1/2015	14	15330071776	7/3/2014	9/30/2014	1/1/2015								
RO2	Q3	A	A	3/11/2015	2	15330078389	7/3/2014	9/30/2014	3/1/2015								
RO2	12G	N	N	1/1/2015	9	15330071721	10/1/2014	10/1/2014	1/1/2015								
RQ2	39G	N	N	1/1/2015	13	15330072145	10/6/2014	11/24/2014	1/5/2015								
RQ2	30G	A	A	3/1/2015	2	15330078387	10/6/2014	11/24/2014	3/1/2015								
F3	Q3	N	10/10/2013	345	13020502605	5/14/2013	9/30/2013			\$0	\$1,810,972		\$486,033	\$1,344,938		\$500,000	\$500,000
F3	Q3	A	3/10/2014	423	14020163918	3/1/2013	9/30/2013			\$0	\$1,811,116		\$457,769	\$1,353,346		\$1,000,000	\$500,000
F3	Q3	A	7/1/2014	424	14020443390	10/1/2013	12/31/2013			\$1,353,346			\$335,470	\$1,759,382		\$750,000	\$250,000
F3	YE	N	1/30/2014	242	14020100817	10/1/2013	12/31/2013			\$1,355,506			\$335,470	\$1,763,542		\$1,000,000	\$1,000,000
F3	YE	A	4/10/2014	303	14020181257	10/1/2013	12/31/2013			\$1,353,346			\$743,506			\$2,000,000	\$1,000,000
F3	YE	A	7/1/2014	304	14020443390	10/1/2013	12/31/2013			\$1,353,346			\$741,506			\$1,750,000	
F3	Q1	N	4/15/2014	483	14020424655	1/1/2014	3/1/2013			\$1,761,382			\$823,573	\$1,634,859		\$750,000	\$750,000
F3	Q1	A	7/1/2014	485	14020424216	1/1/2014	3/1/2013			\$1,759,382			\$573,573	\$1,634,542		\$1,500,000	\$750,000
F3	12P	N	5/5/2014	258	14020343492	4/1/2014	4/30/2014			\$700,096			\$1,219,267	\$1,452,088		\$467,275	\$750,000
F3	12P	A	5/23/2014	257	14020403009	4/1/2014	4/30/2014			\$700,096			\$1,214,067	\$1,452,088		\$462,076	\$750,000
F3	12P	A	7/1/2014	257	14020442709	4/1/2014	4/30/2014			\$698,096			\$1,213,567	\$1,452,088		\$459,575	\$750,000
F3	12P	N	7/7/2014	491	14020450228	5/1/2014	7/2/2014			\$459,575			\$1,474,815	\$1,150,850		\$783,540	\$1,250,000
F3	Q3	N	10/15/2014	125	14021080466	7/3/2014	9/30/2014			\$733,540			\$4,830,891	\$2,961,848		\$2,652,583	\$500,000
F3	Q3	A	3/2/2015	1262	15020109908	7/3/2014	9/30/2014			\$783,540			\$4,830,891	\$2,961,848		\$2,652,583	\$581,262
F3	12G	N	10/23/2014	325	14021742888	10/1/2014	10/15/2014			\$2,652,583			\$1,456,836	\$3,440,076		\$150,000	\$150,000
F3	12G	A	3/2/2015	330	15020108918	10/1/2014	10/15/2014			\$2,652,583			\$1,456,836	\$3,440,076		\$81,262	\$700,000

F3	30G	N	12/4/2014	641	14021421651	10/16/2014	11/24/2014	\$669,343	\$1,875,826	\$2,329,210	\$215,958	\$400,000	\$400,000	\$400,000
F3	30G	A	3/2/2015	660	15020085098	10/16/2014	11/24/2014	\$669,343	\$1,903,945	\$2,338,803	\$234,484	\$370,159	\$1,150,000	\$1,120,159
F3	YE	N	11/31/2015	97	15020085098	11/25/2014	12/31/2014	\$215,958	\$236,717	\$424,918	\$22,757	-	-	\$400,000
F6		N	5/2/2014	5	14020341249									
F6		N	5/15/2014	5	14020360008									
F6		N	5/14/2014	5	14020354323									
F6		N	7/17/2014	7	14020363010									
F6		N	7/17/2014	5	14020363031									
F6		N	7/18/2014	6	14020360938									
F6		N	10/20/2014	7	14021041523									
F6		N	10/20/2014	5	14021062456									
F6		N	10/24/2014	28	14021202991									
F6		N	10/30/2014	18	14021212792									
F6		N	10/27/2014	21	14021210220									
F6		N	10/28/2014	4	14021210820									
F6		N	10/28/2014	7	14021210877									
F6		N	10/27/2014	7	14021210530									
F6		N	5/9/2014	6	14020353419									
F6		N	5/6/2014	7	14020342538									
F6		N	7/7/2014	5	14020442022									
F6		N	7/10/2014	10	14020451452									
F1		N	7/24/2013	7	13020364504									
F2		N	8/22/2013	4	13020383918									
F6		N	10/22/2014	15	14021112419									
F6		N	11/3/2014	4	14021213731									
F6		N	11/3/2014	15	14021213750									
F1		A	12/4/2014	10	14021422451									
Totals								\$14,242,966	\$14,196,681					

Form	Tp	Rpt	Tp	All	Recpt	Dr	End Cvg Dr	Ltr Cvg Dr	Begin Cash	Recpts	Disp	End Cash	Debits	Loans	Debits & Loans
O-Index (2011-2012)															

Cmtc. ID: C00547570 Cmtc. Name: PERDUE FOR SENATE
 Treasurer Name: PAUL KILGORE Address: 3110 MAPLE DRIVE NE SUITE 400, ATLANTA, GA 30305-2650
 Cmtc. Type: S (SENATE) Cmtc. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER
 Form Tp Rpt Tp All Recpt Dr End Cvg Dr Ltr Cvg Dr Begin Cash Recpts Disp End Cash Debits Loans Debits & Loans
 No records were found for this cycle.

**Response Codes, Due Dates, and Receipt Dates for
Perdue for Senate¹
(C00547570)**

Standard 5

Report	Response Code	Description	Due Date	Response Date
2014 Q3	IR	Receipt of Contribution from Persons/Individuals > \$2,600 and/or Qualified Multi-Candidate Committee > \$5,000 (A5-04)	2/17/2015	2/16/2015
2014 12G	IR	Receipt of Contribution from Persons/Individuals > \$2,600 and/or Qualified Multi-Candidate Committee > \$5,000 (A5-04)	2/17/2015	2/16/2015
2014 30G	IR	Receipt of Contribution from Persons/Individuals > \$2,600 and/or Qualified Multi-Candidate Committee > \$5,000 (A5-04)	2/19/2015	2/18/2015
		Contribution from an Individual with a Foreign Address (A5-24)		

Standard 7

Report	Response Code	Description	Due Date	Response Date
2014 12R ²	IR	Failure to File 48-Hour Notice (A7-24)	10/3/2014	10/3/2014
2014 Q3	IR	Failure to File 48-Hour Notice (A7-24)	2/17/2015	2/16/2015
2014 30G	IR	48-Hour Notices Filed, But Not on Schedule A (plural) (A7-26)	2/19/2015	2/18/2015
		Missing Schedule B/C, Loan Repayment on Schedule C ≠ B (A7-41)		

Standard 8

Report	Response Code	Description	Due Date	Response Date
2014 Q3	IR	Inadequate/Incomplete Contributor Information - Citing Emp/Occ (Best Efforts) (A8-02A)	2/17/2015	2/16/2015
2014 12G	IR	Inadequate/Incomplete Contributor Information - Citing Emp/Occ (Best Efforts) (A8-02A)	2/17/2015	2/16/2015

¹ The 2014 October Quarterly, 12 Day Pre-General, and 30 Day Post-General Reports were amended on March 2, 2015. Responses will be updated once the reports are available for review.

² The committee was required to file a 2014 12 Day Pre-Runoff Report. The committee filed this report, with the correct coverage dates, but labeled it a 2014 12 Day Pre-Primary Report. This report is referenced in the referral as the 12R to distinguish it from the regularly filed 12P.

Standard 11

Report	Response Code	Description	Due Date	Response Date
2014 Q3	IR	Inadequate Purpose (A11-05) Staff Travel Reimbursements on Schedule B and No Corresponding Memos (A11-10)	2/17/2015	2/16/2015
2014 30G	IR	Inadequate Purpose (A11-05) No Memo Entry for Staff Reimbursements (A11-07) Staff Travel Reimbursements on Schedule B and No Corresponding Memos (A11-10)	2/19/2015	2/18/2015

RFAI Response Codes:

IR = Inadequate Response; Remaining Violation Exceeds RFAI Threshold

LAR = Late Adequate Response

LIR = Late Inadequate Response; Remaining Violation Exceeds RFAI Threshold

LIRB = Late Inadequate Response; Remaining Violation is Below RFAI Threshold

NR = No Response

Perdue for Senate (C00547570)

1. List of Pseudonyms: None
2. List of All 48-Hour Notices Filed:

Type	New/ Amended	Date Filed	Image Number
48-Hour Notice	N	05/02/2014	14020341249
48-Hour Notice	N	05/06/2014	14020342538
48-Hour Notice	N	05/09/2014	14020353419
48-Hour Notice	N	05/14/2014	14020354323
48-Hour Notice	N	05/15/2014	14020360008
48-Hour Notice	N	07/07/2014	14020442022
48-Hour Notice	N	07/10/2014	14020451452
48-Hour Notice	N	07/17/2014	14020563010
48-Hour Notice	N	07/17/2014	14020563031
48-Hour Notice	N	07/18/2014	14020590938
48-Hour Notice	N	10/20/2014	14021041523
48-Hour Notice	N	10/20/2014	14021062456
48-Hour Notice	N	10/22/2014	14021112419
48-Hour Notice	N	10/24/2014	14021202991
48-Hour Notice	N	10/27/2014	14021210220
48-Hour Notice	N	10/27/2014	14021210530
48-Hour Notice	N	10/28/2014	14021210820
48-Hour Notice	N	10/28/2014	14021210877
48-Hour Notice	N	10/30/2014	14021212792
48-Hour Notice	N	11/03/2014	14021213731
48-Hour Notice	N	11/03/2014	14021213750
48-Hour Notice	N	02/18/2015	15020107477
48-Hour Notice	N	02/18/2015	15020107505