

COPY

12 October, 2009

Office of General Counsel
Federal Election Commission
999 E Street
NW Washington, D.C. 20463

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2009 OCT 18 PM 12:59

2009 OCT 20 P 2:31

OFFICE OF GENERAL
COUNSEL
TRANSFUND PAC

Subject: 2008 ELECTION FINANCE COMPLAINT

SENSITIVE

1: Complainant name and address: William James Scoggin

MUR # 6221

Lemoore, CA. 93245

2: **Complaint #1: IN 2008, TRANSFUND PAC CLAIMED MULTI CANDIDATE STATUS WITHOUT MEETING FULL QUALIFICATION**

a. Transfund PAC is a Leadership PAC affiliated with Rep. Kilpatrick (D-MI). A thorough review of FEC - Transfund PAC public access correspondence shows Transfund PAC improperly amended their status to a multi campaign PAC in July 2008.

b. Transfund PAC amended status to 'multi candidate' effective 01 July 2008, indicating their 51st person contributed on 6-30-08. A review of all individual person contributors reported on schedule A indicates that isn't the case.

c. A review of 'persons' (includes individuals and groups) shows Transfund PAC received one contribution on 6-30-08 from Clear Channel PAC. In order for this to qualify as the 51st person, 50 persons would have been required to contribute on or before that date. However, a review of attachment (a) identifies a total of 50 persons (including Kilpatrick as the first donor) covering the entire 2008 election cycle. Clear Channel PAC was in fact the 47th donor. Transfund PAC never attained 51 persons at any point during the cycle, and thus never qualified for multi-candidate status.

d. Furthermore, please note that two persons (Gildon / Robinson) contributed a total of six times and were counted as six persons. To claim 51 persons for eligibility purposes, Transfund counted Gildon and Robinson's individual contributions as six 'persons' for the 2008 cycle. This error can be duplicated from Schedule A by counting each itemized contribution as a person. Multiple donors should only count as one person. According to Title 11 covering Federal Elections (§ 100.10 Person (2 U.S.C. 431(11))) "Person means an individual, partnership, committee, association, corporation, labor organization, and any other organization, or group of persons."

e. Refer to attachments (a) and (b).

3: **Complaint #2: TRANSFUND PAC EXCEEDED CONTRIBUTION LIMITS TO FEDERAL CANDIDATES**

10044272293

12 October, 2009

a. As a non-multi candidate who sought to improperly amend their status, Transfund PAC exceeded the legal limit for campaign contributions as reported on Schedule B.

b. On July 16th 2008, Transfund PAC made two contributions to KILPATRICK FOR CONGRESS in the amount of \$5000 each for two separate elections, totaling \$10,000. As a non-multi candidate PAC, this exceeded the legal limit by \$5400.

c. On 09-30-08, Transfund PAC made one contribution to DAN SEALS FOR CONGRESS in the amount of \$2000 and again on 10-31-08 in the amount of \$1000, totaling \$3000. Both contributions were made to one 'General Election' in the same cycle, exceeding the legal limit by \$700.00

d. Refer to attachments (c) and (d).

4: Complaint #3: ARTHUR BLACKWELL'S 2008 ELECTION CONTRIBUTIONS TO REP. KILPATRICK EXCEED INDIVIDUAL CONTRIBUTION LIMITS

a. According to FEC limits placed on individual contributions, "A contribution earmarked for a candidate through a political committee counts against the original contributor's limit for that candidate. In certain circumstances, the contribution may also count against the contributor's limit to the PAC. 11 CFR 110.6. See also 11 CFR 110.1(h)."

b. Summary of Blackwell's individual contributions to a single candidate:

(1): \$5000 to the Kilpatrick Leadership PAC on 01/26/07

(2): \$500 to Kilpatrick on 11/2/07

(3): \$1000 to Kilpatrick on 6-30-08

c. Amount contributed to a single candidate exceeds the individual limit by \$1500.

d. Refer to attachments (a) and (e).

Sincerely,


William James Scoggin

Lemoore, CA

10044272296

NOTIFICATION OF MULTICANDIDATE STATUS

(See reverse side for instructions)
 This form should be filed after the Committee qualifies as a multicandidate committee.

1. (a) NAME OF COMMITTEE IN FULL TransFund PAC		2. FEC IDENTIFICATION NUMBER C00430888
(b) Number and Street Address 400 S. Capitol St., SW Suite 404		
(c) City, State and ZIP Code Washington DC 20008		3. TYPE OF COMMITTEE (check one) <input type="checkbox"/> STATE PARTY <input checked="" type="checkbox"/> OTHER

I certify that one of the following situations is correct (complete line 4 or 5):

4. **STATUS BY AFFILIATION:** The committee submitted its Statement of Organization (FEC FORM 1) on 07/14/2008 and simultaneously qualified as a multicandidate committee through its affiliation with:

Committee Name: TransFund PAC
 FEC Identification Number: C00430888

5. **STATUS BY QUALIFICATION:**

(a) **candidates:** The committee has made contributions to the five (5) federal candidates listed below (ONLY state party committees may leave this blank.):

	Name	Office Sought	State/District	Date
(i)	Andre Carson	House	IN 07	04/10/2008
(ii)	Laura Richardson	House	CA 37	07/22/2007
(iii)	Al Wynn	House	MD 04	02/08/2008
(iv)	Hank Johnson	House	GA 04	12/21/2007
(v)	Mark Schauer	House	MI 07	11/16/2007

(b) **Contributors:** The committee received a contribution from its 51st contributor on: 02/20/2008

(c) **Registration:** The committee has been registered for at least 6 months. FEC FORM 1 was submitted on: 02/22/2007

(d) **Qualification:** The committee met the above requirements on: 07/01/2008

I certify that I have completed this Statement and to the best of my knowledge and belief it is true, correct, and complete.

TYPE OR PRINT NAME OF TREASURER Rad Kasir	SIGNATURE OF TREASURER Electronically Filed by Rad Kasir	DATE 07/14/2008
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Text

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

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For further information contact:
 Federal Election Commission, Washington, DC 20463
 Toll-free 800-424-9590
 Local 202-694-1100

FEC FORM 1 M
 Revised 1/2001

ATTACHMENT (b)

10044272297

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 8 / 10

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30a

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in Full)
TransFund PAC

A. Full Name (Last, First, Middle Initial)
DONALD CRAVINS JR FOR CONGRESS

Mailing Address PO BOX 2807

City OPELOUSAS State LA Zip Code 70570

Purpose of Disbursement Campaign Contribution
Candidate Name Donald Cravins

Office Sought: House Senate President
Disbursement For: 2008
 Primary General Other (specify) ▾

State: LA District: 07

Transaction ID: D337770
Date of Disbursement 09 / 30 / 2008

Amount of Each Disbursement this Period
2000.00

B. Full Name (Last, First, Middle Initial)
KILPATRICK FOR UNITED STATES CONGRESS

Mailing Address PO BOX 32175

City DETROIT State MI Zip Code 48232

Purpose of Disbursement Campaign Contribution
Candidate Name Carolyn Kilpatrick

Office Sought: House Senate President
Disbursement For: 2008
 Primary General Other (specify) ▾

State: MI District: 13

Transaction ID: D337770
Date of Disbursement 07 / 16 / 2008

Amount of Each Disbursement this Period
5000.00

C. Full Name (Last, First, Middle Initial)
KILPATRICK FOR UNITED STATES CONGRESS

Mailing Address PO BOX 32175

City DETROIT State MI Zip Code 48232

Purpose of Disbursement Campaign Contribution
Candidate Name Carolyn Kilpatrick

Office Sought: House Senate President
Disbursement For: 2008
Primary General Other (specify) ▾

State: MI District: 13

Transaction ID: D337771
Date of Disbursement 07 / 16 / 2008

Amount of Each Disbursement this Period
5000.00

SUBTOTAL of Disbursements This Page (optional) 12000.00

TOTAL This Period (last page this line number only)

PERMANENT

10044272298

ATTACHMENT (C)

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 8/10

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 29a	<input type="checkbox"/> 29b	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (in Full)
TransFund PAC

A. Full Name (Last, First, Middle Initial)
CONGRESSIONAL BLACK CAUCUS POLITICAL ACTION COMMIT

Transaction ID: D337778
Date of Disbursement
08 / 30 / 2008

Mailing Address 227 Massachusetts Ave NE

City Washington State DC Zip Code 20002

Purpose of Disbursement Contribution

Candidate Name CONGRESSIONAL BLACK CAUCUS POLITICAL ACTION COMMIT Category/ Type

Office Sought: House Senate President Disbursement For: Primary General Other (specify) State: District:

Amount of Each Disbursement this Period
2500.00

B. Full Name (Last, First, Middle Initial)
CONGRESSIONAL BLACK CAUCUS POLITICAL ACTION COMMIT

Transaction ID: D337781
Date of Disbursement
08 / 30 / 2008

Mailing Address 227 Massachusetts Ave NE

City Washington State DC Zip Code 20002

Purpose of Disbursement Contribution

Candidate Name CONGRESSIONAL BLACK CAUCUS POLITICAL ACTION COMMIT Category/ Type

Office Sought: House Senate President Disbursement For: Primary General Other (specify) State: District:

Amount of Each Disbursement this Period
2500.00

C. Full Name (Last, First, Middle Initial)
DAN SEALS FOR CONGRESS

Transaction ID: D337780
Date of Disbursement
08 / 30 / 2008

Mailing Address P.O. Box 584

City Wilmette State IL Zip Code 60091

Purpose of Disbursement Campaign Contribution

Candidate Name Dan Seals Category/ Type

Office Sought: House Senate President Disbursement For: 2008 Primary General Other (specify) State: IL District: 10

Amount of Each Disbursement this Period
2000.00

SUBTOTAL of Disbursements This Page (optional) **7000.00**

TOTAL This Period (last page this line number only)

10044272299

ATTACHMENT (d-1 of 2)

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 6/7

<input type="checkbox"/> 21a	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 29a	<input type="checkbox"/> 29b	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (in Full)
TransFund PAC

10044272300

A.

Full Name (Last, First, Middle Initial) DAN SEALS FOR CONGRESS	Transaction ID: D060833 Date of Disbursement 10 / 31 / 2008
Mailing Address P.O. Box 584	Amount of Each Disbursement this Period 1000.00
City Wilmotte State IL Zip Code 60081	
Purpose of Disbursement Contribution	
Candidate Name Dan Seals Category/Type	
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: IL District: 10	Disbursement For: 2008 <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify) <input type="checkbox"/>

B.

Full Name (Last, First, Middle Initial) DAVID SCOTT FOR CONGRESS	Transaction ID: D060914 Date of Disbursement 10 / 20 / 2008
Mailing Address P.O. BOX 900821	Amount of Each Disbursement this Period 2000.00
City RIVERDALE State GA Zip Code 30298	
Purpose of Disbursement Contribution	
Candidate Name David Scott Category/Type	
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: GA District: 13	Disbursement For: 2008 <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify) <input type="checkbox"/>

C.

Full Name (Last, First, Middle Initial) PETERS FOR CONGRESS	Transaction ID: D060940 Date of Disbursement 10 / 27 / 2008
Mailing Address PO BOX 226	Amount of Each Disbursement this Period 2000.00
City BLOOMFIELD HILLS State MI Zip Code 48303	
Purpose of Disbursement Contribution	
Candidate Name Gary Peters Category/Type	
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: MI District: 09	Disbursement For: 2008 <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify) <input type="checkbox"/>

SUBTOTAL of Disbursements This Page (optional)	5000.00
TOTAL This Period (last page this line number only)	5000.00

ATTACHMENT (d-2 of 2)

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) or each category of the Detailed Summary Page	FOR LINE NUMBER: PAGE 7/18	
	<input checked="" type="checkbox"/> 11a <input type="checkbox"/> 11b <input type="checkbox"/> 11c <input type="checkbox"/> 12 <input type="checkbox"/> 13 <input type="checkbox"/> 14 <input type="checkbox"/> 15 <input type="checkbox"/> 16 <input type="checkbox"/> 17	

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NAME OF COMMITTEE (in Full)
TransFund PAC

Full Name (Last, First, Middle Initial) A. Arthur England		Date of Receipt M M / D D / Y Y Y Y 01 / 26 / 2007	
Mailing Address Doway Development Co., LLC 718 Griswold St. 1805		Transaction ID: C9224463	
City Detroit	State MI	Zip Code 48226	Amount of Each Receipt this Period 8000.00
FEC ID number of contributing federal political committee. C			
Name of Employer Doway Development Co.		Occupation CEO	
Receipt For: Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) <input type="checkbox"/>		Aggregate Year-to-Date <input type="checkbox"/> 5000.00	

Full Name (Last, First, Middle Initial) B. R. J. J. Burrot		Date of Receipt M M / D D / Y Y Y Y 01 / 19 / 2007	
Mailing Address 91490 Coachlight Ln		Transaction ID: C9224447	
City Bingham Farms	State MI	Zip Code 48025-4104	Amount of Each Receipt this Period 500.00
FEC ID number of contributing federal political committee. C			
Name of Employer Symson, Inc.		Occupation Consultant	
Receipt For: Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) <input type="checkbox"/>		Aggregate Year-to-Date <input type="checkbox"/> 500.00	

Full Name (Last, First, Middle Initial) C. Teds F. Bula-Dudley		Date of Receipt M M / D D / Y Y Y Y 01 / 19 / 2007	
Mailing Address 19184 Breton Dr.		Transaction ID: C9224451	
City Detroit	State MI	Zip Code 48226	Amount of Each Receipt this Period 5000.00
FEC ID number of contributing federal political committee. C			
Name of Employer Ronald Dudley		Occupation CEO	
Receipt For: Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) <input type="checkbox"/>		Aggregate Year-to-Date <input type="checkbox"/> 5000.00	

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ATTACHMENT (e-1)



SEARCH RESULTS

Search Criteria:

Donor name: Blackwell, Arthur

Cycle(s) selected: 2008

[Start another search](#)

• [Sort by Name](#)

[Sort by Date \(Descending\)](#)

[Sort by Amount](#)

[Sort](#)

2 records found in 0.010 seconds.

Total for this search: \$1,500

1

BLACKWELL, ARTHUR DETROIT, MI 48202	GREEKTOWN CASINO LLC/INVESTOR	8/30/08	\$1,000	Kilpatrick, Carolyn Cheeks (D)
BLACKWELL, ARTHUR DETROIT, MI 48202	GREEKTOWN CASINO LLC/INVESTOR	11/2/07	\$500	Kilpatrick, Carolyn Cheeks (D)

1

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ATTACHMENT (e)

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