



FEDERAL ELECTION COMMISSION
Washington, DC 20463

January 6, 2023

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Hansel J. McCadams, Esq.
Hawley & McCadams PLLC
308 West Washington Street
Paris, TN 38242

RE: MUR 7429
Flinn for Congress f/k/a
Friends of George Flinn

Dear Mr. McCadams:

This is in reference to the complaint you filed with the Federal Election Commission on July 16, 2018, concerning Flinn for Congress f/k/a Friends of George Flinn and its treasurer (the "Committee" or "respondent"). On May 26, 2022, the Commission found that there was reason to believe the Committee violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i), provisions of the Federal Election Campaign Act of 1971, as amended, and the Commission's regulations. On January 4, 2023, the Commission accepted a conciliation agreement signed by the respondent, and closed the file in this matter.

Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). A copy of the conciliation agreement and the Factual and Legal Analysis, which more fully explain the Commission's findings in this matter, are enclosed for your information.

If you have any questions, please contact me at (202) 694-1505 or cgallagher@fec.gov.

Sincerely,

A handwritten signature in cursive script that reads "Christine C. Gallagher".

Christine C. Gallagher
Attorney

Enclosures
Conciliation Agreement
Factual and Legal Analysis

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 7429
Flinn for Congress f/k/a)	
Friends of George Flinn and Lonnie Treadaway)	
in his official capacity as treasurer)	

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint. The Federal Election Commission found reason to believe that Flinn for Congress f/k/a Friends of George Flinn and Lonnie Treadaway in his official capacity as treasurer (the “Committee” or “Respondent”) violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i) by failing to properly report the purpose of certain disbursements.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i).
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondent enters voluntarily into this agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
 1. Flinn for Congress f/k/a Friends of George Flinn is a political committee within the meaning of 52 U.S.C. § 30101(4)(A). The Committee was George Flinn’s principal campaign committee for his 2018 campaign for Tennessee’s 8th Congressional District.

2. Lonnie Treadaway is the Committee's treasurer.

3. The Act and Commission's regulations require that authorized candidate committees, including principal campaign committees, disclose the total amount of all disbursements, and disbursements in certain categories, including "expenditures made to meet the candidate or committee operating expenses." 52 U.S.C. § 30104(b)(4)(A); 11 C.F.R. § 104.3(b)(2)(i). Authorized committees are further required to identify the name and address of each person to whom an expenditure is made aggregating in excess of \$200 during the election cycle to meet an operating expense, together with the date, amount, and purpose of such operating expenditure. 52 U.S.C. § 30104(b)(5)(A), (6)(A); 11 C.F.R. §§ 104.3(b)(4)(i), 104.9(a).

4. The Commission's regulations define "purpose" as a "brief statement or description of why the disbursement was made." 11 C.F.R. §§ 104.3(b)(3)(i)(A), (b)(4)(i)(A), 104.9(a). The Commission has provided guidance that "the 'purpose of disbursement' entry, when considered along with the identity of the disbursement recipient, must be sufficiently specific to make the purpose of the disbursement clear." *See* Statement of Policy: "Purpose of Disbursement" Entries for Filings with the Commission, 72 Fed. Reg. 887 (Jan. 9, 2007) (citing 11 C.F.R. §§ 104.3(b)(3)(i)(B), (4)(i)(A)). The Commission has determined that the description of purpose should be sufficient to allow "a person not associated with the committee [to] easily discern why the disbursement was made when reading the name of the recipient and the purpose." Purpose Statement of Policy, 72 Fed. Reg. at 888.

5. The Committee's disclosure reports from the 2018 election cycle in their entirety show that it disclosed \$3,074,148 in disbursements to Caissa Public Strategies for "campaign management" or "campaign management expenses." The chart below itemizes the

Committee's disbursements to Cassia Public Strategies as set forth in its reports filed with the Commission.

Report and Date of Disbursement	Payee	Disbursement Description	Amount
Amend. 2018 Apr Qtr Feb. 1, 2018	Caissa Public Strategies	Campaign Management	\$197,350
Amend. 2018 Apr Qtr Feb. 21, 2018	Caissa Public Strategies	Campaign Management	\$654,000
Amend. 2018 Apr Qtr Feb. 22, 2018	Caissa Public Strategies	Campaign Management Expenses	\$12,000
Amend. 2018 July Qtr May 2, 2018	Caissa Public Strategies	Campaign Management	\$147,762
Amend. 2018 July Qtr June 5, 2018	Caissa Public Strategies	Campaign Management	\$442,488
Amend. 2018 July Qtr June 12, 2018	Caissa Public Strategies	Campaign Management	\$199,702
Amend. 2018 July Qtr June 22, 2018	Caissa Public Strategies	Campaign Management	\$30,846
Amend. 2018 12 Day Pre-Primary July 3, 2018	Caissa Public Strategies	Campaign Management	\$1,000,000
Termination July 19, 2018	Caissa Public Strategies	Campaign Management	\$390,000
		TOTAL	\$3,074,148

6. The Committee made a \$12,000 payment to Renasant Bank for poll workers, which the Committee disclosed in its reports filed with the Commission as a disbursement to Caissa for "campaign management expenses." Given that the purpose of the disbursement was poll work rather than campaign management, the purpose of the disbursement was incorrectly described.

7. During 2018, the Committee spent millions of dollars airing fifteen television advertisements and produced campaign signs in connection with Flinn's campaign for Congress. Given that the Committee's 2018 disclosure reports do not disclose any disbursements for advertising, disbursements for advertising have been inadequately or incorrectly described as "campaign management."

8. In response to the Commission's reason-to-believe finding, Respondent amended its 2018 disclosure reports to properly disclose the purpose of disbursements made to Caissa Public Strategies.

V. Respondent failed to properly disclose the purpose of certain disbursements on its 2018 disclosure reports filed with the Commission in violation of 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i).

VI. Respondent will take the following actions:

1. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Thirty-Six Thousand dollars (\$36,000), pursuant to 52 U.S.C. § 30109(a)(5)(A).

2. In ordinary circumstances, the Commission would seek a higher civil penalty based on the violations outlined in the Agreement. The Commission is taking into account, however, the Committee's limited cash-on-hand; that it has outstanding debts and obligations; and that according to the Committee, it has a limited ability to raise additional funds.

3. Respondent will cease and desist from violating 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i).

VII. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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Conciliation Agreement
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IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lisa J. Stevenson
Acting General Counsel

BY: Charles Kitcher
Charles Kitcher
Associate General Counsel for Enforcement

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Charles Kitcher
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Date

FOR THE RESPONDENT:



Lonnie Treadaway
Treasurer, Flinn for Congress formerly known as
Friends of George Flinn

11-30-22

Date

FEDERAL ELECTION COMMISSION**FACTUAL AND LEGAL ANALYSIS**

RESPONDENT: Flinn for Congress f/k/a Friends of George Flinn **MUR 7429**
Lonnie Treadaway in his official capacity as treasurer

I. INTRODUCTION

This matter was generated by a complaint filed with the Federal Election Commission pursuant to 52 U.S.C. § 30109(a)(1) alleging that Flinn for Congress f/k/a Friends of George Flinn and Lonnie Treadaway in his official capacity as treasurer (the “Committee”) disclosed inadequate or incomplete purposes of \$974,350 in disbursements to vendors for “campaign management” and “accounting” in its 2018 April Quarterly Report in violation of the Federal Election Campaign Act of 1971, as amended (the “Act”).¹ The Committee denies the allegation.

Based on the allegations of the complaint, the response, and the available information, the Commission finds reason to believe that Flinn for Congress f/k/a Friends of George Flinn and Lonnie Treadaway in his official capacity as treasurer violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i) by failing to properly report the purpose of certain disbursements.

II. FACTUAL AND LEGAL ANALYSIS**A. Factual Background**

George Flinn was a 2018 Republican primary candidate in Tennessee’s 8th Congressional District.² The Committee’s 2018 April Quarterly Report discloses four disbursements: three to Caissa Public Strategy, LLC (“Caissa”) in the amounts of \$197,350 and \$654,000 for “campaign

¹ Compl. at 1 (July 9, 2018). Since the filing of the Complaint, the name of the Committee changed from “Friends of George Flinn” to “Flinn for Congress.” Flinn for Congress, Amended Statement of Organization at 1 (Apr. 27, 2022). The Committee’s current treasurer is Lonnie Treadaway. Flinn for Congress, Amended Statement of Organization at 1 (June 7, 2022). At the time of the events in this matter, Sondra Annette Grills was the Committee’s treasurer. Friends of George Flinn, Amended Statement of Organization at 1 (Feb. 2, 2018).

² Flinn lost the primary election on August 2, 2018.

1 management,” and \$12,000 for “campaign management expenses;”³ and one to Watkins
2 Uiberall, PLLC (“Watkins”) in the amount of \$3,000 for “accounting.”⁴ Based on this
3 information, the Complaint alleges that the Committee was “effectively hiding the nature of its
4 true expenses.”⁵

5 In response, the Committee denies that it was attempting to hide expenses.⁶ The
6 Committee asserts that it hired one vendor, Caissa, as a “full-service communications firm” to
7 “manage all aspects of running the campaign,” including “determin[ing] the target audience,
8 messaging, marketing elements, and timeline.”⁷ The Committee further asserts that it hired
9 another vendor, Watkins, to do the accounting work.⁸ According to the Committee, its \$12,000
10 payment to Caissa was for “poll workers,” and it provides a copy of the check drawn on the
11 Committee’s bank account dated February 22, 2018, payable to “Renasant Bank” in that amount
12 with the notation “cash” written in the bottom left hand corner; on the same date, the Committee
13 disclosed a \$12,000 disbursement to Caissa for “campaign management expenses.”⁹ In addition,
14 the Committee provides a copy of an invoice from Watkins in the amount of \$3,000 for “2018

³ The Complaint incorrectly alleges that the \$12,000 disbursement was disclosed as \$120,000 in the Committee’s report. *See* Compl. at 1; Resp. at 1 (Aug. 7, 2018); Friends of George Flinn, Amended 2018 April Quarterly Report at 7 (July 3, 2018).

⁴ Friends of George Flinn, Amended 2018 April Quarterly Report at 8 (July 3, 2018).

⁵ Compl. at 1.

⁶ Resp. at 1.

⁷ *Id.*

⁸ *Id.*

⁹ *Id.* at Attach. 1; Friends of George Flinn, Amended 2018 April Quarterly Report at 7 (July 3, 2018).

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1 January and February Accounting Fees,” and the check payment.¹⁰ Last, the Committee
 2 provides copies of two invoices from Caissa, for “Campaign Marketing and Outreach” for the
 3 months of January and February 2018 in the amounts of \$197,350 and \$654,000, respectively,
 4 along with copies of the check payments.¹¹ None of the invoices provide further details of the
 5 services provided.

6 The Committee’s disclosure reports from the 2018 election cycle in their entirety show
 7 that it disclosed approximately \$3,000,000 in disbursements to Caissa for “campaign
 8 management” or “campaign management expenses,” and \$10,500 in disbursements to Watkins
 9 for “accounting.” The Committee disclosed no disbursements to any other person. The chart
 10 below itemizes the Committee’s disbursements as set forth in its reports filed with the
 11 Commission.¹²

Report and Date of Disbursement	Payee	Disbursement Description	Amount
Amend. 2018 Apr Qtr Feb. 1, 2018	Caissa Public Strategies	Campaign Management	\$197,350
Amend. 2018 Apr Qtr Feb. 21, 2018	Caissa Public Strategies	Campaign Management	\$654,000
Amend. 2018 Apr Qtr Feb. 22, 2018	Caissa Public Strategies	Campaign Management Expenses	\$12,000
Amend. 2018 Apr Qtr March 15, 2018	Watkins Uiberall	Accounting	\$3,000

¹⁰ *Id.* at Attach. 2-3.

¹¹ *Id.* at Attach. 4-7.

¹² *See* Friends of George Flinn, Amended 2018 April Quarterly Report at 7, 8 (July 3, 2018); Friends of George Flinn, Amended 2018 July Quarterly Report 7-9 (Sept. 14, 2018); Friends of George Flinn, Amended 2018 12 Day Pre-Primary Report at 6 (Sept. 14, 2018); Friends of George Flinn, Termination Report at 6 (Sept. 14, 2018). CELA sent a letter to the Committee denying its request for termination pending the outcome of this matter. *See* Letter from Kathryn Ross, CELA, to Sondra Annette Grills, Treasurer, Friends of George Flinn (Nov. 15, 2018).

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Amend. 2018 July Qtr May 2, 2018	Caissa Public Strategies	Campaign Management	\$147,762
Amend. 2018 July Qtr May 24, 2018	Watkins Uiberall	Accounting	\$3,000
Amend. 2018 July Qtr May 24, 2018	Watkins Uiberall	Accounting	\$1,500
Amend. 2018 July Qtr June 9, 2018	Watkins Uiberall	Accounting	\$1,500
Amend. 2018 July Qtr June 5, 2018	Caissa Public Strategies	Campaign Management	\$442,488
Amend. 2018 July Qtr June 12, 2018	Caissa Public Strategies	Campaign Management	\$199,702
Amend. 2018 July Qtr June 22, 2018	Caissa Public Strategies	Campaign Management	\$30,846
Amend. 2018 12 Day Pre-Primary July 3, 2018	Caissa Public Strategies	Campaign Management	\$1,000,000
Termination July 19, 2018	Caissa Public Strategies	Campaign Management	\$390,000
Termination Aug. 8, 2018	Watkins Uiberall	Accounting	\$1,500

1 According to news reports, beginning in June 2018, the Committee spent millions of
2 dollars airing television commercials on broadcast and cable stations in West Tennessee.¹³ The
3 Committee’s Facebook and Twitter pages indicate that, between January 19 and July 29, 2018, it

¹³ Michael Collins and Daniel Connolly, *President Donald Trump Backs US Rep. David Kustoff in Republican Primary for Congress*, MEMPHIS COMMERCIAL APPEAL (July 27, 2018), <https://www.commercialappeal.com/story/news/politics/2018/07/27/trump-endorses-tennessee-congressman-david-kustoff-re-election/852253002/> (“Flinn has already spent \$2.7 million of his own money on the race, with much of that going toward TV ads that attack Kustoff’s conservative credentials.”); *Flinn Launches New TV Ad Focused on Kustoff Voting With Pelosi 227 Times*, THE TENNESSEE STAR (June 13, 2018), <http://tennesseestar.com/2018/06/13/flinn-launches-new-tv-ad-focused-on-kustoff-voting-with-nancy-pelosi-227-times/>; Daniel Connolly, *Flinn’s Willingness to Spend His Own Millions Makes for Competitive Race vs. Kustoff in District 8*, MEMPHIS COMMERCIAL APPEAL (July 24, 2018), <https://www.commercialappeal.com/story/news/2018/07/24/district-8-congress-tn-tennessee-politics-david-kustoff-george-flinn/769863002/>; *Dr. George Flinn Will Challenge Congressman David Kustoff for Congressional Rematch*, VOLUNTEER STATE REPORT (Jan. 2018), <http://ecmsuite.fec.gov/ecmprd/llisapi.dll/fetch/2000/23676/367992/367912/4830676/4831406/5085888/Flinn-challenge-kustoff-congress-%281%29.pdf?nodeid=5086522&vernum=-2>; *US Congressional Candidate Dr. George Flinn Makes Stop in West Tennessee*, WBBJ 7 Eyewitness News Staff (July 26, 2018), <https://www.wbbjtv.com/2018/07/26/u-s-congressional-candidate-dr-george-flinn-makes-stop-in-west-tennessee/>.

1 aired fifteen television advertisements and produced campaign signs in connection with Flinn’s
2 campaign for Congress.¹⁴ The Committee’s 2018 disclosure reports do not disclose any
3 disbursements for advertising.

4 **B. Legal Analysis**

5 The Act and Commission’s regulations require that authorized candidate committees
6 disclose the total amount of all disbursements, and disbursements in certain categories, including
7 “expenditures made to meet candidate or committee operating expenses.”¹⁵ Authorized
8 Committees are further required to identify the name and address of each person to whom an
9 expenditure is made aggregating in excess of \$200 during the election cycle to meet an operating
10 expense, together with the date, amount, and purpose of such operating expenditure.¹⁶ The
11 Commission’s regulations define “purpose” as a “brief statement or description of why the
12 disbursement was made.”¹⁷ The regulations list examples of adequate descriptions of the
13 “purpose” of operating expenses, including “dinner expenses, media, salary, polling, travel, party
14 fees, phone banks, travel expenses, travel expense reimbursement, and catering costs.”¹⁸
15 However, examples of inadequate descriptions for the reporting of a disbursement include,

¹⁴ See @GeorgeFlinn, FACEBOOK, www.facebook.com/georgeflinn; @GeorgeFlinn, TWITTER, www.twitter.com/GeorgeFlinn.

¹⁵ 52 U.S.C. § 30104(b)(4)(A); 11 C.F.R. § 104.3(b)(2)(i).

¹⁶ 52 U.S.C. § 30104(b)(5)(A), (6)(A); 11 C.F.R. §§ 104.3(b)(4)(i), 104.9(a).

¹⁷ 11 C.F.R. §§ 104.3(b)(3)(i)(A), (b)(4)(i)(A), 104.9(a).

¹⁸ 11 C.F.R. §§ 104.3(b)(3)(i)(B), 104.3(b)(4)(i)(A); see also FEC, Purposes of Disbursement (last updated Aug. 21, 2018) (“FEC, Purposes of Disbursement”), <https://www.fec.gov/help-candidates-and-committees/purposes-disbursement>.

1 “advance, election day expenses, other expenses, expenses, expense reimbursement,
2 miscellaneous, outside services, get-out-the-vote, and voter registration.”¹⁹

3 In addition to both non-exhaustive lists, the Commission has provided guidance that “the
4 ‘purpose of disbursement’ entry, when considered along with the identity of the disbursement
5 recipient, must be sufficiently specific to make the purpose of the disbursement clear.”²⁰ The
6 Commission has determined that the description of purpose should be sufficient to allow “a
7 person not associated with the committee [to] easily discern why the disbursement was made
8 when reading the name of the recipient and the purpose.”²¹

9 Here, the Committee’s description “accounting” is sufficiently specific to describe its
10 disbursements for the services rendered by Watkins to the Committee.²² However, the
11 Committee’s description of the purpose for \$3 million in disbursements to Caissa Public
12 Strategies during the 2018 cycle for “campaign management,” is not sufficiently specific to
13 make the purpose of the disbursement clear when considered in conjunction with the payee’s
14 identity.²³ For example, the Committee’s \$12,000 payment to Renasant Bank for poll workers,²⁴

¹⁹ 11 C.F.R. §§ 104.3(b)(3)(i)(B), 104.3(b)(4)(i)(A) (emphasis in the original); *see also* FEC, Purposes of Disbursement.

²⁰ *See* Statement of Policy: “Purpose of Disbursement” Entries for Filings with the Commission, 72 Fed. Reg. 887 (Jan. 9, 2007) (“Purpose Statement of Policy”) (citing 11 C.F.R. §§ 104.3(b)(3)(i)(B), (4)(i)(A)).

²¹ Purpose Statement of Policy, 72 Fed. Reg. at 888; *see also* FEC Campaign Guide for Congressional Candidates at 103 (June 2014) (the description of purpose must be sufficiently specific such that it makes clear the reason for the disbursement when considered in conjunction with the payee’s identity).

²² *See* FEC, Purposes of Disbursement (the Commission’s website includes “Accounting/Accounting Services” as a sufficient description of purpose).

²³ *See* Purpose Statement of Policy, 72 Fed. Reg. at 888.

²⁴ *See* Resp. at 1 & Attach. 1.

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1 which the Committee disclosed on its reports filed with the Commission as a disbursement to
2 Caissa for “campaign management expenses,” suggests that the purpose of the disbursement was
3 poll work rather than campaign management. Further, given the information that the
4 Committee aired several television advertisements and produced campaign signs, the
5 disbursements for advertising also appear to have been inadequately or incorrectly described as
6 “campaign management.”²⁵ A person reading the Committee’s disclosure reports would not
7 have discerned that the Committee was disbursing funds for advertising by reading the name of
8 the recipient (*i.e.*, Caissa) together with the reported purpose (*i.e.*, campaign management or
9 campaign management expense).²⁶

10 Further, review of Flinn’s Committee’s disclosure reports in past election cycles in
11 connection with his prior candidacies shows that these past reports disclosed more specific
12 purposes of the Committee’s disbursements to Caissa. During the 2016 election cycle, there are
13 four disbursements to Caissa for “public policy advising” or “public policy & political services”
14 in the total amount of \$163,841, and one disbursement in the amount of \$850,000 for
15 “advertising.”²⁷ In addition, Flinn’s campaign committees during the 2012 and 2014 election

²⁵ See First Gen. Counsel’s Rpt. at n.5, Factual & Legal Analysis at 2-3, MUR 6204/AR 08-02 (Dallas County Republican Party) (finding reason to believe that committee violated, *inter alia*, 52 U.S.C. § 30104(b)(5) (formerly 2 U.S.C. § 434(b)(5)) where committee disclosed an inadequate or incorrect purpose for 50 disbursements totaling \$215,261 and sometimes reported generic purposes such as “professional fees” and “fundraising consultant”); Certification at ¶¶ 3, 7, MUR 6134 (Cranley for Congress) (Nov. 19, 2008) (approving the Report of the Audit Division dated April 23, 2008, as the Factual & Legal Analysis) (sample review projected \$1.4 million in disclosed disbursements lacked required information including, but not limited to, missing or inadequate purposes); Conciliation Agreement at ¶ IV.9, MUR 5635 (Conservative Leadership Political Action Committee, *et al.*); Final Audit Report at 23, Conservative Leadership Political Action Committee (Nov. 29, 2004) (committee failed to disclose a complete or adequate purpose for disbursements totaling \$595,715).

²⁶ See Purpose Statement of Policy, 72 Fed. Reg. at 888.

²⁷ See Friends of George Flinn, 2016 July Quarterly Report at 6 (July 15, 2016); Flinn for Senate, 2015 October Quarterly Report at 1 (Dec. 2, 2015), Flinn for Senate, 2015 Year-End Report at 1 (Jan. 28, 2016), Flinn for Senate, 2016 Termination Report at 1 (March 30, 2016). See also FEC, Purposes of Disbursement.

1 cycles disclosed disbursements to Caissa for “direct mail – Joe Carr piece,” “direct mail –
2 comparison,” “robo call to 700,000 voters,” “direct mail – healthcare,” “direct mail,”
3 “telephone,” “parking,” “advertising” and “signs.”²⁸ This more complete disclosure of
4 disbursements to Caissa for advertising is absent from the Committee’s disclosure of
5 disbursements to Caissa during the 2018 election cycle.

6 Therefore, there is reason to believe Flinn for Congress f/k/a Friends of George Flinn and
7 Lonnie Treadaway in his official capacity as treasurer violated 52 U.S.C. § 30104(b)(5)(A)
8 and 11 C.F. R. § 104.3(b)(4)(i) by failing to properly disclose the purpose of certain disbursements.

²⁸ Flinn for Congress, 2012 Second Amended July Quarterly Report at 15-18, 22, 23 (July 17, 2012), Flinn for Congress, 2012 October Quarterly Report at 13, 15-16 (Oct. 15, 2012), Flinn for Congress, 2012 Amended 12 Day Pre-General Report at 9 (Nov. 6, 2012), Flinn for Congress, 2012 30-Day Post-General Report at 13-15 (Dec. 6, 2012); Flinn for Senate, 2014 October Quarterly Report at 2, 6, 8 (Oct. 14, 2014), Flinn for Senate, 2014 Amended 12-Day Pre-Primary Report at 1 (Dec. 2, 2014).