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July 11, 2019

Federal Election Commission
Office of Complaints Examination
and Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

RE: MUR 7605

Dear Ms. Dennis:

In response to the letter and Complaint received on or about June 13, 2019, Judson Hill for Congress, Inc. responds as follows:

- 1) The corporation Judson Hill for Congress, Inc. was organized on December 12, 2016 under the laws of the State of Georgia and formally dissolved with the Georgia Secretary of States after the defeat in the Special Election Primary, once the last campaign financial disclosure was filed with the FEC and the campaign bank account was reconciled and closed about two years ago. A final campaign corporation report was filed with the FEC the end of October 2017. At that time, the campaign ceased to exist. The candidate was never a shareholder, member, director or officer of the corporation nor did he ever have access of any kind to the campaign bank account, campaign or campaign bank records, nor was he involved in recording financial accounts or preparation of any campaign disclosures. To best assure compliance, those activities were out sourced to Professional Data Services, Inc. that collected, recorded and prepared all campaign contributions, receipts and expenses, and thereafter timely filed all required campaign financial documents with the Federal Elections Commission.
- 2) To my knowledge as Treasurer of the campaign corporation, supplemented by our other team members, at the time the contribution in question was received by the campaign committee, the committee was provided the required contributor information as reflected on page 8 of the relevant campaign disclosure filed September 2017. The campaign corporation justifiably relied on the information provided to its representatives related to the contribution in question and had no reason to question any information provided to it.
- 3) Nobody affiliated with the campaign has personal knowledge of the allegations stated in the complaint against Mr. Price. The allegations imply that there may be an internal family issue that forms the basis for the complainant's allegations. No one related to the campaign or the campaign corporation has any knowledge, direct or indirect, of any of those allegations.

For the reasons stated above, no action should be taken against Judson Hill for Congress, Inc. or any individuals associated or affiliated with the corporation and any inquiry, should one exist, into the corporation or any affiliated individuals serving in their official or individual capacity should be dismissed or closed.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 11, 2019.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'CD Clayton', is written over a horizontal line.

Chris D. Clayton, Treasurer
Of Dissolved Entity, Judson Hill for Congress, Inc.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MAY 10 2019

Judson Hill for Congress, Inc.
Chris D. Clayton, Treasurer
P.O. Box 71493
Marietta, GA 30007

RE: MUR 7605

Dear Mr. Clayton:

The Federal Election Commission received a complaint that indicates Judson Hill for Congress, Inc., and you in your official capacity as treasurer may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 7605. Please refer to this number in all future correspondence.

The Act affords you the opportunity to demonstrate in writing that no action should be taken against Judson Hill for Congress Inc., and you in your official capacity as treasure in this matter. If you wish to file a response, you may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Where appropriate, statements should be submitted under oath by persons with relevant knowledge. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and § 30109(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share information on a confidential basis with other law enforcement agencies.¹

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission. Please note that you have a legal obligation to preserve all documents, records and materials relating to the subject matter of the complaint until such time as you are notified that the Commission has closed its file in this matter. See 18 U.S.C. § 1519.

¹ The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).

Any correspondence sent to the Commission, such as a response, must be addressed to **one** of the following (note, if submitting via email this Office will provide an electronic receipt by email):

Mail

OR

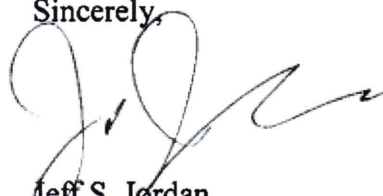
Email

Federal Election Commission
Office of Complaints Examination
and Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

CELA@fec.gov

If you have any questions, please contact Christal Dennis at (202) 694-1650 or toll free at 1-800-424-9530. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jeff S. Jordan
Assistant General Counsel
Complaints Examination &
Legal Administration

Enclosures:

1. Complaint
2. Procedures
3. Designation of Counsel Statement