

**BEFORE THE
FEDERAL ELECTION COMMISSION**

IN RE)
)
 Tennessee Democratic Party) MUR 7877
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DECLARATION OF CAROL V. ABNEY

1. My name is Carol V. Abney. I am the Treasurer of the Tennessee Democratic Party (“TDP”). I was elected Treasurer in January of 2021. As Treasurer, I am responsible for all financial and compliance activities of the TDP. In addition to my role as Treasurer, I am a Certified Public Accountant.

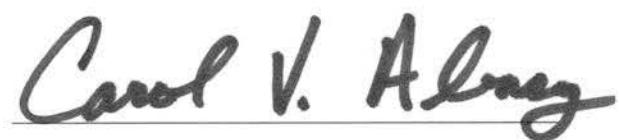
2. It is my understanding that during and after the 2016 election cycle, the TDP has continuously relied upon the service and expertise of outside professional consulting firms in furtherance of its financial and compliance operations. During the 2016 election cycle, it is my understanding that these services were provided by a company called Next Level Partners. It is my understanding that the issues related to this matter were primarily caused by the acts and omissions of this company. In 2017, the TDP dismissed Next Level Partners and retained a new compliance company, Political CFO’s. Political CFO’s has provided continuous service to the TDP since that date. Political CFO’s helped to align the TDP’s compliance practices with FEC standards and is responsible for the following services:

- Maintenance of records of receipts and disbursements as necessary to comply with recordkeeping and reporting requirements under applicable federal and state campaign finance laws;
- reconciliation of bank accounts for purposes of preparing disclosure reports to the Federal Election Commission (the “FEC”) and state authorities;
- preparation of reports required to be filed with the FEC and state authorities;
- Preparation of internal financial statements as may be reasonably requested by Committee;
- Preparation of required amendments to FEC or state report filed during the term of this Agreement;
- Coordination of recordkeeping and data maintenance by Committee finance staff, information technology staff and consultants and software vendors as applicable; and
- Training of Committee Staff in compliance with applicable FEC and state campaign finance rules and recordkeeping requirements.

3. Since my election as Treasurer of the TDP, the TDP has developed and implemented several improved compliance procedures and will continue to institute new oversight procedures as needed, to ensure that reports are filed accurately both from an informational and financial perspective. In addition, the TDP has instituted several procedural safeguards in accordance with recommendations made by the Federal Election Commission related to the best practices of committee management and internal controls. To that end, all wires and checks above \$1,000 require approval by two authorized

signers. Furthermore, the TDP has decentralized accounting functions to ensure that there are multiple checks and balances related to the processing of receipts and disbursements, and requires a monthly review and reconciliation of all bank statements by myself and Political CFO's to ensure accuracy of reporting.

4. I declare under penalty of perjury that the foregoing is true and correct to the best of my present knowledge, information and belief. Dated this 10 day of June, 2021.

A handwritten signature in black ink that reads "Carol V. Abney". The signature is fluid and cursive, with "Carol" and "V." on the first line and "Abney" on the second line.

Carol V. Abney, CPA