

OFFICE OF
GENERAL COUNSEL

John Eaves for Congress

OFFICE OF
GENERAL COUNSEL

2020 JAN 13 PM 2: 18

5051 Peachtree Corners Circle SUITE 1100B PM 2: 17

Peachtree Corners, GA. 30092

January 7, 2020

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

MUR #

7678

Dear General Counsel:

I am a candidate for the U.S. Congress District 7 (Ga). I wish to file a complaint against Keisha Carter, who was hired by the John Eaves for Congress Campaign as a Finance Director (consultant) on March 30, 2019. I terminated the consultancy with Ms. Carter on November 30, 2019, based on improprieties that she committed while serving as my Finance Director.

I request that the Federal Election Commission review this matter and take the appropriate and necessary actions against Ms. Carter. The reasons for the complaint are cited below and outlined in the Atlanta Police Department Offense Report (see enclosed).

1. Ms. Carter accompanied John Eaves to complete paperwork to open an account with Wells Fargo for the John Eaves Campaign on March 10, 2019. This account was to be the official depository of funds raised by the John Eaves for Congress Campaign.
2. Ms. Carter, however, opened and maintained an unauthorized "holding account" at Ameris Bank that was the depository of funds generated by the John Eaves for Congress Campaign via payments made on the campaign website and processed by Anedot credit card processing company
3. Ms. Carter co-mingled another candidate's campaign funds with the John Eaves for Congress Campaign funds in the unauthorized "holding account" at Ameris Bank
4. Ms. Carter has possibly embezzled funds by allegedly spending John Eaves for Congress Campaign funds in the "holding account" for personal purposes
5. Ms. Carter has purposely and knowingly completed and filed erroneous quarterly financial disclosure reports on behalf of the John Eaves for Congress Campaign to the FEC
6. Ms. Carter has transferred John Eaves for Congress Campaign funds between unauthorized "holding accounts" at Ameris Bank and Wells Fargo Bank

7. Ms. Carter has not returned or transferred John Eaves for Congress Campaign funds as of today into the official campaign bank account, which I consider theft of funds

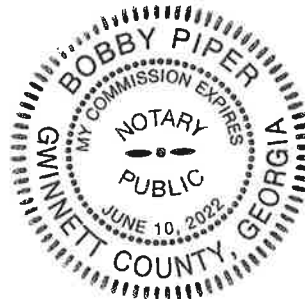
I wish to affirm that the above details are to my best ability accurate and truthful, and I request that you perform an investigation. Feel free to contact me if you need more information. I can be reached at john@eavesforcongress.com [REDACTED]

Sincerely,



John H. Eaves, PhD
Complainant

Subscribed and sworn to before me on this 10th day of Jan, 2020.



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 Printed Date: 12/19/2019

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ATLANTA POLICE DEPARTMENT
 Offense Report
 INCIDENT NUMBER: 193530669-00

*** THIS REPORT INCLUDES RECORDS STILL IN WORKFLOW ***

----- INCIDENT INFORMATION -----

Report Date: 12/19/2019 Time: 09:29
 Reporting Officer: 3978 (JACKSON)
 Officer Making Rpt: 3978 (JACKSON)
 Occur/Earliest Date / Time: 03/10/2019 09:00
 Location: 505 PRYOR ST SW, ATLANTA
 Latest Poss Date / Time: 12/17/2019 09:00
 Assoc Offense #:
 RD: 303 Beat: 303 Shift: D
 Zone: 03
 Damaged Amount: Stolen Amount: Stolen Amount:
 Disposition: Dispo Date:

----- OFFENSES -----

Offense: 2799A (EMBZ-OTHER OVER \$10,000)
 GCIC: 2799 Att/Comp: UCR: 1200 Vacant Prop: 0

----- VICTIM -----

Victim #1
 Name: JOHN EAVES FOR CONGRESS
 Juvenile?: NO
 Home Address: 510 GUTHERINDGE COURT, 1210, PEACHTREE CORNERS, GA 30092
 SSN: DOB: Sex: Race:
 Hgt: Wgt: Hair: Eye:
 Driver's License: State:
 Employer:
 Emp Address:

--- Home Contact ---
 CELL # (404) 909-3249

----- OTHER INVOLVED PARTIES -----

Reporting Party #2
 Name: EAVES, JOHN H.
 Juvenile?: NO
 Home Address: 510 GUTHERINDGE COURT, 1210, PEACHTREE CORNERS, GA 30092
 SSN: DOB: 10/31/1961 Sex: M Race: W
 Hgt: Wgt: Hair: Eye:
 Driver's License: State:
 Employer:

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ATLANTA POLICE DEPARTMENT
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Emp Address:

--- Home Contact ---
 CELL # [REDACTED]

----- SUSPECT -----

Suspect #1

Date and Time Last Updated: 12/19/2019 10:53:40 AM Officer Signed ID: 3978

Name: CARTER, KEISHA

Juvenile ?: NO

Home Address: 505 PRYOR ST SW, ATLANTA, GA 30312

SSN: DOB: 06/10/1979

Sex: F

Race: B

Hgt: Wgt:

Hair:

Eye:

Driver's License: State:

Employer:

Emp Address:

--- Home Contact ---
 CELL # [REDACTED]

INCIDENT NARRATIVE

I, Inv. Robert Jackson #3978, received a phone call from the victim, John Eaves, advised that he was running for the 7th Congressional Seat and had set up a fund raising account with Razor Solutions to manage his fund raising and the campaign account. Mr. Eaves stated he believed that the person he setup to manage his fund raising and act as treasurer had stolen money from the campaign.

Mr. Eaves advised that on 3/8/19 that he, in company with suspect Keisha Carter - owner of Razor Solutions, had opened an account named "John Eaves for Congress" at a Wells Fargo located in Downtown Atlanta for his campaign funds to be deposited into and bills to be paid out of. On 3/10/19 he signed a contract with Razor Solutions/ Ms. Carter at the business address of 505 Pryor St. SW Atlanta, GA, Fulton County, to manage his fund raising and act as treasurer. During the course of several months he began to receive contact from various vendors that they were not getting paid or were being paid late. Mr. Eaves began checking the Wells Fargo account and found that monies that he knew had been contributed were not being shown in the Wells Fargo account that he and Ms. Carter had set up for that purpose. He stated that he contact Ms. Carter and that she advised that she had been holding money contributed to the campaign in a "holding account", of which he states he was not aware of, and then would transfer funds from that account to the Wells Fargo campaign

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account as needed. Mr. Eaves stated Ms. Carter advised that she did this all the time for other campaigns she managed or worked with all the time. Mr. Eaves stated he requested full disclosure of all transactions in and out of the "holding account", it's account # and bank of issuance to be able to be accountable and to account for all donations & funds.

I met with Mr. Eaves at the Atlanta Public Safety Headquarters and discussed the matter in further detail. Mr. Eaves was advised that there may or may not be a criminal case in this matter. I would need additional information from him and to investigate the matter further before I could state with any certainty that there was or was not a crime committed. I was provided by Mr. Eaves a synopsis of events (time line), points of contact list, copy of an email string that Mr. Eaves had with Ms. Carter over the campaign funds, copy of the contract he made with Public Service Partners WIN3 (Razor Solutions) copies of the Wells Fargo bank statements starting March, 2019 when it was opened through October, 2019 and the three quarterly "Report of Receipts & Disbursements" filed by Ms. Carter with the FEC per campaign law requirements.

I will contact the FEC (Federal Election Commission) for clarification on accounts and other rules/laws as well as contact banks and card processors for detailed records of transactions for determination if any crimes were committed.

The investigation continues.

OFFENSE REPORT REVIEWED BY JACKSON, R J ON 12/19/2019 10:53:40 AM

OFFENSE REPORT APPROVED BY



K.P.

(404) 200-1111
info@lamarlawoffices.com
lamarlawoffices.com

Keisha Carter
Razor Solutions 309 Smokerise Street
Marietta, GA. 30067

Re: Demand of Transfer of John Eaves for Congress Campaign Funds,

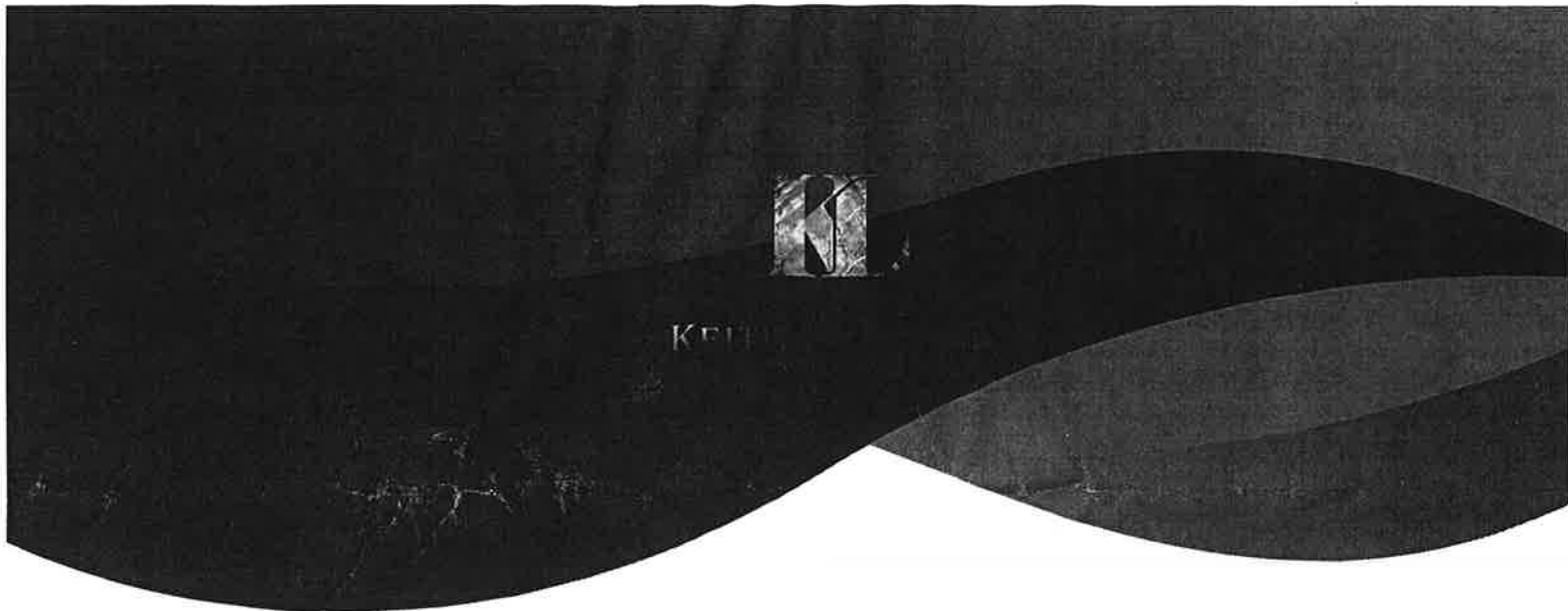
December 23, 2019

Dear, Mrs. Carter

Since being hired as a campaign consultant by the John Eaves for Congress Campaign on March 10, 2019, you have maintained possession of campaign funds in an unauthorized "holding account" with Fidelity Bank (Ameris Bank) and Wells Fargo. Despite repeated written requests by email to have these funds transferred into the official John Eaves for Congress campaign account at Wells Fargo, you have not complied as of date.

Please be advised that my client, John Eaves for Congress Campaign, considers this noncompliance as a potential act of embezzlement and theft of funds. The John Eaves for Congress Campaign demands that all monies be transferred into the John Eaves for Congress Campaign by Tuesday, December 24, 2019 11:59 PM. Additionally, as stated in his November 21, 2019 email, the John Eaves for Congress Campaign demands that you provide the following:

1. Date that this unauthorized account was opened and under what name.
2. A detailed reporting of transactions from March 10, 2019 through December 19, 2019 that includes deposits made via credit card and debit card from the John Eaves for Congress website via Anedot into the unauthorized account with Ameris Bank.
3. A detailed reporting of checks deposited for the John Eaves for Congress campaign from March 10, 2019 through December 19, 2019 into the unauthorized account.



4. A detailed reporting of expenses paid from the unauthorized account for the John Eaves for Congress Campaign with the appropriate receipts.

Failure to comply with the above instructions will show malice intent on your part, leaving us no choice but to contact and involve Law Enforcement.

The written reports should be mailed to:

John Eaves for Congress Campaign
5051 Peachtree Corners Circle
Norcross, GA. 30092

Sincerely,

Keith Lamar Jr.

The Law Office of Keith Lamar Jr.
3355 Lenox Road NE Suite 1000 Atlanta, GA 30326 (404) 250-3275
Lamarlawoffices.com