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*By abailey at 12:30 pm, Nov 15, 2022*

**From:** [Administrator Public Service Partners](#)  
**To:** [Dominique Dillenseger](#)  
**Subject:** Response to MUR #7678  
**Date:** Monday, November 14, 2022 4:41:12 PM  
**Attachments:** [Response to MUR -7678 2.pdf](#)

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Good Afternoon.

Please see the response to MUR 7678 attached to this email. If you have any further questions please contact me at your convenience.

Keisha Carter



Keisha Carter  
Principal Consultant  
Public Service Partners  
1917 Barrett Knoll Circle, NW  
Kennesaw, GA 30152

Response to MUR #7678

Federal Elections Commission  
Attn: Dominique Dillenseger  
Sent Via electronic mail to [ddillenseger@fec.gov](mailto:ddillenseger@fec.gov)

To All it May Concern:

I am writing this in response to the Certified Mail received at 1917 Barrett Knoll Circle, Kennesaw, GA 30152. The address listed under Public Service Partners was changed in April 2020 to 331 E. Rhinehill Rd. SE, Atlanta, GA 30315 to which no correspondence was received until I was contacted via text to offer an opportunity to respond, confirm my address and submit this response.

Based on the legal analysis I have been accused of knowingly and willfully failing to keep accurate records and file accurate reports. There are many reasons this is not true as stated below, but most importantly during my time as treasurer, all reports were filed accurately and timely with the records that were kept in my capacity with his campaign.

As treasurer of the John Eaves for Congress campaign as stated in the legal analysis, I was responsible for keeping accurate accounting of receipts, disbursements, and cash-on-hand balances. This was done under the guise and supervision of the entire campaign staff and not in avoidance of it. I, along with the candidate and campaign staff filed accurate reports to the commission as required through the October 15, 2019 quarterly report.

I as treasurer continued to keep and file all campaign information, activity, contributions, and disbursements for the campaign. I filed all campaign reports after receiving approval and review from candidate Eaves and staff of contributions, and disbursements during each period, as I have done with every campaign I have participated in.

I, as treasurer, never opened or concealed any account from the candidate nor the campaign at any time while I was acting in this capacity. Candidate Eaves, when he decided to change campaign teams during the campaign, then asked me to add new people to the campaign account. I, as still treasurer, said I would do so, after the new treasurer learned and became abreast of FEC procedure, because as still Treasurer I knew and understood I would be liable for mistakes made if not done correctly.

I offered candidate Eaves, his campaign staff, and his treasurer multiple times to review all financial documents, monies owed and any outstanding invoices that needed to be paid. Candidate Eaves refused to set the meeting, then while continuing to engage in services from my company, invited a former employee to our shared offices at that time, to export and download proprietary information from our company systems so that he could depart without fulfilling obligations and monies owed to the company.

Candidate Eaves attempt to file a police report, in which I spoke with the detective and the case did not move forward, was an attempt to disparage my name and strengthen this frivolous complaint to the Federal Election Commission. Candidate Eaves attempts to use the fact of filing this report as proof of wrong-doing is false and should not be considered in evidence.

Candidate Eaves was offered the opportunity to review and transfer any all information, monies, past invoices and paperwork utilized to file all reports to date and refused on multiple occasions. Candidate Eaves inability to file reports is unsubstantiated, as we departed in November of 2019, in which his reports were filed through September 30<sup>th</sup> 2019. Upon that departure I included with Candidate Eaves my company's final invoice to be paid that included services to date and that was paid from the account and asked where the final amount was to be deposited. He said, at that time, "If I pay this, it will wipe me out." I replied, this is what is owed based on the contract. From that point forward, Candidate Eaves ceased communication and the correspondence was never replied to, to this date.

Candidate Eaves has a known reputation for not completing, filing, or terminating election reports in any campaign that he has ran or been a part of to date. Please see his Chairman of Fulton County compliance (he resigned from office in 2017 and his last filing was in 2017 with an active balance:

blob:<https://fultoncountygaeasyvotecampaignfinance.com/a323ae01-cfbd-47e1-9320-73cd252e3740> ), Candidate for Mayor of Atlanta compliance (2019

blob:<https://atlantacityeasyvotecampaignfinance.com/784087be-2aae-455b-b7f0-793d1e974e34> with an active balance ) and his Candidate for Georgia Secretary of State compliance reports, (2022<https://efile.ethics.ga.gov/#/exploreDetails/JhGJiYiK2nls5JE19-XQ7ZP4048PFnxLXRUfdOLcQk01/21/null/247/2022> ) Here you will see the pattern that emerges with Candidate Eaves of late or non-filing for each and every campaign he has conducted to date.

In 2011, I had to threaten a suit through a final demand letter on Candidate Eaves for nonpayment for compliance and fundraising activities during his 2019 campaign for Chairman of Fulton County Georgia. After agreeing to assist him again in 2014, multiple amendments had to be filed to correct his records because Candidate Eaves has a reputation throughout Georgia of non-filing and non-payment to staff and vendors, as to why I asked for it to be paid for us to close our relationship out amicably. Instead, Candidate Eaves chose to engage in deception when I was not in the office to avoid having to pay on the 45 day breach of contract.

Every filing Candidates Eaves has done before and after my involvement ceased, has been late, fined, and is incomplete. I cannot be held accountable for non-filings he has with the Federal Elections Commission because he has shown a pattern of fact of doing this in every campaign he has ever operated.

My insistence of training and talking with the new treasurer was because of this fact and although Candidate Eaves was moving on with another team, I could still be held accountable for my role in the campaign as the assigned treasurer.

The operation of multiple campaign accounts by my firm, is not in contradiction with the Police report filed by Candidate Eaves as my company does more than 25 local, state and federal campaigns every year. As well as PAC and non-connected accounts, to which we open and operate multiple accounts for every cycle. Candidate Eaves has tried to make it seem through filing a police report, that he was not aware nor received multiple checks and transactions to vendors from this account, as to him asking me to pay multiple vendors throughout the campaign. There was no way for me to do so without having access to an account, as to which he knew I had none to the new one he set up and did not follow through on providing access.

To date, outside of the correspondence by the Federal Elections Commission I have not been made aware of the candidate or his committee requesting anything since our last conversation in November 2019. I made several requests to meet at the bank, sit down with the treasurer and review any and all documentation in the transition before he stopped responding, which was denied. Instead, Candidate Eaves attempted to steal proprietary information, file a false report to the police and the Federal Elections Commission.

The Commission also states that because he filed a sworn statement and hired a lawyer his credibility is further solidified. To this date, I have not been contacted by any attorney, no suit has been filed and the case to my knowledge has not moved forward in the last 3 years. I have not hired an attorney to address this matter, but I have consulted legal counsel as to my response, the commissions response, and my right to further sue Candidate Eaves for breach of the original contract, monies owed up to 45 calendar days from his termination of contract and any civil suits that may need to arise from these frivolous and false accusations.

As stated, I do have a lot of experience with Federal, State and local campaigns. Which should further substantiate why I would not engage in any activities that could jeopardize my livelihood for a campaign that I was only a part of for 8 months. I kept all records for which I filed timely reports and offered those records to Candidate Eaves and his campaign. All of Candidate Eaves reports have been filed late, and unbalanced since we have no longer been involved, which would have nothing to do my involvement in 2019.

As of this date, Candidate Eaves has continued to file reports late and has multiple filings that have not been completed even to the Federal Elections Commission, while still holding open multiple filings that have not been completed to 3 local and state entities in Georgia. As of this correspondence his last report for the FEC October quarterly was filed on November 1<sup>st</sup>.

Based on the information provided in this document, it did not consider Candidate Eaves record of inconsistencies he has made for more than 10 years in running for office, while it used for my basis of knowledge and fact for doing this work for 18 years as to reason to find me in violation. The only common denominator in Candidate Eaves lack of filing, and keeping maintaining accurate records is Candidate Eaves.

This investigation assumed through Candidate Eaves statements that they were true and that I withheld documentation to be filed. There was only a month and 10 days into which the campaign was in the next disclosure period after my departure in November 2019. I offered to Candidate Eaves, his campaign, his shortly hired campaign manager any and all documentation, Candidate Eaves refused to set a time to do so in an effort to not pay or for me not to receive compensation owed for services.

Candidate Eaves lack of filing during that time was not due to our ongoing dispute but his willingness to continue doing what he has always done, not file or file late his contribution disclosure reports.

Based on my prior experience with Candidate Eaves and my knowledge of FEC policy, is why I asked for the new treasurer to participate in FEC Webinars. That is a sound and credible basis based on historical knowledge and reference of Candidate Eaves. I did not withhold any information as all was shared with candidate Eaves at every filing period, every invoice was sent to him for approval and all contributions were recorded in the online contribution method and on all FEC documentation for filing. He had and should still have all of this information in his possession.

I did not knowingly or willfully violate 52 U.S.C. 30102(c) and (h) and 30104(b) by failing to keep accurate records and file accurate reports as all were filed with the FEC on behalf of the committee through October 15<sup>th</sup> quarterly report of 2019.

I am asking that this complaint be dismissed as Candidate Eaves has knowingly and willfully not been honest about his time with my services in this complaint. Based on the trail of unfiled reports and unsubstantiated accusations lauded at me without basis of fact outside of Candidate Eaves willingness to not fulfill his obligation to me as a vendor or his campaign by filling reports timely even after this analysis was sent.

I ask that this complaint be dismissed because I did file all reports until the time of separation and Candidate Eaves had access to all records to file subsequent reports to the commission on time, which he has not done so as well.

I ask that this complaint be dismissed because the finding in the analysis are not based on fact or even circumstantial evidence but based on the word of Candidate Eaves which has a substantiated history of not being true and has utilized his position as candidate and elected official to circumvent responsibility to the authorities he is responsible to report to in a timely manner.

Thank you for your time in allowing me to complete this rebuttal to the legal analysis. I am available for further questions and discussion at your convenience.

Keisha A Carter

Public Service Partners

[Keisha@publicservicepartners.com](mailto:Keisha@publicservicepartners.com)

