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FEDERAL ELECTION COMMISSION

MAY 26, 2020 2:26 PM

OFFICE OF GENERAL COUNSEL

Tuesday, May 26, 2020

Mathilde Carpet

MUR 7740

Athens GA 30605

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

**RE: Possible Violation of Federal Election Law by Teresa Tomlinson for Senate
 and Undivided Purpose**

Dear Office of the General Counsel of the Federal Elections Commission,

I write to you today to request your full attention and review of what I believe to be serious, ethically questionable conduct and possibly unlawful coordination between the "Teresa Tomlinson for Senate" campaign and "Undivided Purpose," a super-PAC which is making expenditures in support of her bid.

"Teresa Tomlinson for Senate" is the registered campaign committee of former Columbus, GA mayor Teresa Tomlinson. The committee filed its paperwork as an exploratory committee on April 5, 2019, and then amended that filing as a campaign committee on April 30, 2019.

On March 23, 2020, "Undivided Purpose" filed paperwork as an outside committee supporting the "Teresa Tomlinson for Senate" campaign. Later, on May 13th, 2020, "Undivided Purpose" filed a required spending disclosure that listed one \$10,000 independent expenditure¹ to "Mad River Communications" for digital advertising on behalf of "Teresa Pike Tomlinson," whose candidate committee is "Teresa Tomlinson for Senate."

"Mad River Communications" is a digital consulting firm that shares an address and a principal with "Trippi, Norton, Rossmessl Campaigns" (formerly known as "Joe Trippi & Associates,"²) the same firm and principal that "Teresa Tomlinson for Senate" currently employs.³

In addition, according to a fundraising contribution page⁴, "Undivided Purpose" uses the same fundraising consulting firm, "Berger Hirschberg Strategies," that the "Teresa Tomlinson for Senate" campaign also currently employs and has made several expenditures to this date.⁵

¹ Filing FEC-1405505, Federal Election Commission, May 18, 2020, <https://docquery.fec.gov/cgi-bin/forms/C00742809/1405505/sc>

² "Interview: Joe Trippi," *PR Week*, December 14, 2006, <https://www.prweek.com/article/1259508/interview-joe-trippi>

³ Disbursements, Federal Election Commission, "Teresa Tomlinson for Senate" to "Joe Trippi and Associates," https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00701383&recipient_name=trippi&two_year_transaction_period=2020&min_date=01%2F01%2F2019&max_date=12%2F31%2F2020

⁴ "Undivided Purpose ActBlue Contribution Page" (See attachment #1)

⁵ Disbursements, Federal Election Commission, "Teresa Tomlinson for Senate" to "Berger Hirschberg Strategies," https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00701383&recipient_name=berger+

Given the similarities in consulting firms and principals between the campaign, "Teresa Tomlinson for Senate," and the independent expenditure, "Undivided Purpose," I believe the FEC must conduct an immediate and comprehensive review to ensure no coordination has taken place between the "Teresa Tomlinson for Senate" campaign and the pro-Tomlinson "Undivided Purpose" super PAC. Such coordination would violate 52 U.S.C. § 30101,⁶ which explicitly states that an "independent expenditure," is one that is "not made in concert or cooperation with or at the request or suggestion of such candidate, the candidate's authorized political committee, or their agents, or a political party committee or its agents."

Any such coordination or involvement between the two camps would also violate 52 U.S.C. § 30104,⁷ which states that when independent expenditures are made, the independent group must file a certification, "under penalty of perjury," stating that their expenditure is being made without "cooperation, consultation, or concert, with, or at the request or suggestion of, any candidate or any authorized committee or agent of such committee."

Given these statutory injunctions against coordination between independent expenditure groups and campaign committees, the unusual pattern presented here is suspect, and deserves close examination. I find it warranted to submit this complaint and request for a full review of any such coordination, cooperation, or consultation between the "Teresa Tomlinson for Senate" campaign and the independent expenditure "Undivided Purpose."

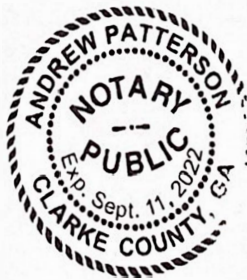
I look forward to your investigation into this serious matter.

Sincerely,

Mathilde Carpet

Mathilde Carpet

Subscribed and sworn to before me
this 27 day of August, 2020.
Notary Public Andrew Patterson



⁶ 52 U.S.C. § 30101, *Independent expenditure*, pg. 9

⁷ 52 U.S.C. § 30104, Title 52. Voting and elections § 30104, pgs. 26-27

ATTACHMENT 1

ActBlue Fundraising Page for Undivided Purpose



Donate to Undivided Purpose

Help us support Mayor Teresa Tomlinson in her bid to win the Georgia senate race!

Should you have additional questions, please don't hesitate to reach out to Daniel Pardee at (530) 574-3974 or Daniel@bhstrategiesllc.com

Choose an amount:

Your contribution will benefit Undivided Purpose.

\$5,000

\$10,000

\$15,000

\$20,000

\$25,000

\$50,000

\$100,000

\$

Make it monthly!