

from the Newton County line, 6.1 miles from the Rockdale, and therefore 6.1 miles away from DeKalb County.

The billboard was clearly not aimed to reach DeKalb County residents. The obvious purpose of the billboard was and is to create name recognition with a sign of approval for Tom Brown, directed at tens of thousands of Newton and Rockdale County motorists traversing I-20 westbound toward DeKalb County and the City of Atlanta daily from on or about October 21, 2013 through on or about January 1, 2014.

On or about January 2014, the message on the electronic billboard changed from displaying the name "Tom Brown" with the box check marked, into a full-blown Tom Brown For Congress flashing billboard.

The disclosure report that Thomas Brown filed with the FEC dated Jan. 1, 2014, and the amended report filed Jan. 2, 2014, makes no mention of either an expenditure for this campaign billboard, or an in-kind donation of the campaign billboard. The failure to disclose is a violation of FEC rules. Neither sign displayed the required disclaimer as required by FEC for paid advertising. Therefore, if an independent committee is responsible, they too are in violation of the rules.

As evidence that the billboard was up as of October 21, 2013, in furtherance of Thomas Brown's campaign for Congress is an entry made on that date via the Facebook Page of Tom Brown campaign supporter Sherri Washington, who wrote:

"My good friend Thomas Brown will announce this week that he will be a candidate for United States Congress. This is a sign that was donated by an anonymous contributor. On behalf of the exploratory committee for Tom Brown for Congress we say thank you!! ---with Thomas Brown." **(Attachment 9)**

Lamar Advertising, one of the largest billboard advertising companies in the Metro Atlanta area has a digital billboard located on Interstate 20 just 1.2 miles west of Exit 82 and about 2 miles from the billboard donated to former Sheriff Tom Brown. The Lamar billboard is available to political campaigns at the rate of \$2,500 per month (with a 10% discount, making it \$2,250 per month) for six spots every minute with a guarantee of 1,332, ten second spots per day.

If Lamar is charging Fair Market Value, the nearby billboard purportedly donated to former Sheriff Tom Brown which has been in place at least since mid-October of 2013 could represent a minimal value of \$11,225. Since there is no disclosure by the Tom Brown for Congress Campaign of any payments for the billboard and his own supporter says, it is from an "Anonymous Donor" it can be assumed that this is either a gift from an individual or a business.

With the billboard flashing Tom Brown's name from October-December, and flashing Tom Brown for Congress from January through the date of this complaint for a total of 5+ months, the in kind contribution of said billboard at the fair market rate would represent a minimal value of \$11, 225.00 which far exceeds the maximum allowable contribution that an individual could make to a candidate, and constitutes a violation under federal law. If the billboard is owned by a corporation or business,