

COMPLAINT BEFORE THE FEDERAL ELECTION COMMISSION

FEDERAL ELECTION COMMISSION

1050 First Street, N.E.

Washington, D.C. 20463

In the Matter of:

Hudson for Alabama (FEC Committee ID: C00906453)

Lori Beth Raymond, Treasurer, Hudson for Alabama, in her official capacity as treasurer

Jared Hudson, Candidate for U.S. Senate, Alabama

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COMPLAINT

1. Dale Shelton Deas, Jr, MD ("Complainant") brings this Complaint before the Federal Election Commission ("FEC" or "Commission") pursuant to 52 U.S.C. § 30109(a)(1) and 11 C.F.R. § 111.4, seeking an immediate investigation and enforcement action against Hudson for Alabama, Lori Beth Raymond (Treasurer), and Jared Hudson (Candidate) for direct and serious violations of the Federal Election Campaign Act ("FECA"), 52 U.S.C. § 30101 *et seq.*, and Federal Election Commission regulations at 11 C.F.R. Part 110.
 2. This Complaint concerns an apparent scheme by Hudson for Alabama to solicit, accept, and redesignate individual contributions in a coordinated manner that exploits per-election contribution limits by designating funds to a "runoff" election that had not been called and could not have been called at the time the contributions were made and redesignated, thereby inflating the committee's reported fundraising totals and cash-on-hand figures in violation of federal campaign finance law.
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COMPLAINANT

3. Complainant is Dale Shelton Deas, Jr., MD, an individual residing at 308 Old Mill Ln, Hoover, AL, 35244, who believes that the violations described herein have occurred or are occurring.
 4. Statements in this Complaint based on personal knowledge are so identified. Statements based on information and belief are identified as such, with the sources of information stated, as required under 11 C.F.R. § 111.4(c)-(d).
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RESPONDENTS

5. Hudson for Alabama is the principal campaign committee authorized by Jared Hudson for the 2026 United States Senate election in the State of Alabama, registered with the Federal Election Commission under Committee ID C00906453, with a mailing address of 505 20th Street North, Suite 1220, Birmingham, AL 35203.
 6. Lori Beth Raymond is, and was at all relevant times, the treasurer of Hudson for Alabama. Under the FECA, the treasurer of a political committee is responsible for filing accurate disclosure reports and ensuring compliance with contribution limits. 52 U.S.C. § 30104(a). A political committee treasurer is personally liable for failures to comply with the Act.
 7. Jared Hudson is a candidate for United States Senate in Alabama for the 2026 election cycle, and is the authorizing candidate for Hudson for Alabama.
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JURISDICTION

8. The Commission has jurisdiction over this matter pursuant to 52 U.S.C. § 30109(a)(1), which authorizes any person who believes a violation of the FECA has occurred to file a complaint with the Commission. The violations described herein concern federal contribution limits under 52 U.S.C. § 30116, contribution designations and redesignations under 11 C.F.R. § 110.1(b), and reporting requirements under 52 U.S.C. § 30104.
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RELEVANT LEGAL FRAMEWORK

A. Contribution Limits Per Election

9. Under FECA and FEC regulations, no individual may make contributions to any candidate and their authorized political committees with respect to any election for federal office that, in the aggregate, exceed the applicable limit. 52 U.S.C. § 30116(a)(1)(A); 11 C.F.R. § 110.1(b)(1). For the 2025–2026 election cycle, the individual contribution limit is \$3,500 per election.
10. The limits on contributions to candidates apply separately to each federal election in which the candidate participates. A primary, general, runoff, and special election are each considered a separate election with a separate limit. 11 C.F.R. § 100.2.

B. Redesignation of Contributions

11. A redesignation occurs when the contributor instructs the candidate committee in writing to use the excessive portion of a contribution for a different election than the one for which it was originally intended. 11 C.F.R. § 110.1(b)(5).
12. The redesignation process serves a specific remedial purpose: it allows a committee to remedy an excessive contribution by applying the excess amount to a different election for which the contributor has not yet reached the limit. When requesting a redesignation, the committee must inform the contributor that they may, alternatively, request a refund of the excessive amount. 11 C.F.R. § 110.1(b)(5)(ii)(1).

13. The contributor must provide the committee with a signed redesignation within 60 days of the treasurer's receipt of the initial contribution. 11 C.F.R. § 110.1(b)(5)(ii)(2).

C. Contributions for Elections Not Yet Held

14. Under FEC Advisory Opinion 2009-15, the Commission concluded that under certain limited circumstances, an authorized committee may accept contributions that may be used in a special or emergency election or runoff, even though an election has not been scheduled and may not occur. However, this advisory opinion addressed contingent elections in special or emergency contexts, not the systematic, pre-planned redesignation of contributions to a runoff election in a regular election cycle before any primary has even been held.

D. Alabama 2026 Election Calendar

15. The Alabama Republican primary for the 2026 United States Senate election is scheduled for May 19, 2026. A primary runoff, if necessary (i.e., if no candidate receives a majority of votes), is scheduled for June 16, 2026. The general election is scheduled for November 3, 2026.

16. As of the date the contributions at issue were made, September 30, 2025, no primary had been held, no runoff had been triggered, and no runoff could have been triggered, as the primary election was still approximately eight months away.

FACTUAL ALLEGATIONS

The following factual allegations are based on information and belief, derived from federal campaign finance records filed with the Federal Election Commission by Hudson for Alabama and publicly available at FEC.gov. Specific FEC Transaction IDs are cited for each transaction described below.

A. The Anderson Family Contributions — September 30, 2025

17. On September 30, 2025, eight (8) members of the Anderson family each made a contribution of \$10,500 to Hudson for Alabama. The contributors and their respective Transaction IDs are:

Contributor	Amount	Transaction ID
Charles C. Anderson Sr.	\$10,500	SA11A.3474

Susan T. Anderson	\$10,500	SA11A.3470
Terry Anderson	\$10,500	SA11A.3488
Amber Anderson	\$10,500	SA11A.3498
Molly R. Anderson	\$10,500	<i>[See FEC filings]</i>
Harold Anderson	\$10,500	<i>[See FEC filings]</i>
Charles Anderson Jr.	\$10,500	<i>[See FEC filings]</i>
Clyde Anderson	\$10,500	<i>[See FEC filings]</i>
Total	\$84,000	

18.

All eight contributions were made on the same date, for the same amount, in what appears to be a coordinated action.

19. On the same day, September 30, 2025, each of these \$10,500 contributions was immediately redesignated by the committee. Of each \$10,500 contribution, \$3,500 was retained for the primary election, \$3,500 was redesignated to a "General" election, and \$3,500 was redesignated to a "Runoff" election. For example, with respect to the contribution of Charles C. Anderson Sr.:

- Original contribution of \$10,500 (Transaction ID: SA11A.3474)
- Redesignation of \$3,500 to Runoff (Transaction ID: SA11A.3491)
- Redesignation of \$3,500 to General (Transaction ID: SA11A.3493)

20. This identical redesignation pattern was applied to every one of the eight Anderson family contributions on the same day.

B. Jimmy Dunne III Contribution — June 19, 2025

21. On June 19, 2025, Jimmy Dunne III, of North Palm Beach, Florida, contributed \$10,500 to Hudson for Alabama (Transaction ID: SA11A.199).
22. On the same day, the contribution was redesignated:
 - Redesignation of \$3,500 to Runoff (Transaction ID: SA11A.336)
 - Redesignation of \$3,500 to General (Transaction ID: SA11A.338)

C. Tom Werner Contribution — June 30, 2025

23. On June 30, 2025, Tom Werner, of Pacific Palisades, California, contributed \$7,000 to Hudson for Alabama (Transaction ID: SA11A.474).
24. On August 29, 2025, \$3,500 of this contribution was redesignated to a Runoff election (Transaction ID: SA11A.2588).

D. Pattern of Systematic Redesignation to Runoff Election

25. The contributions described above demonstrate a consistent, systematic practice by Hudson for Alabama of accepting contributions in amounts of \$10,500 (the maximum permissible across three elections: primary, general, and runoff at \$3,500 each) and immediately redesignating portions to a "Runoff" election and a "General" election on the same day or shortly after the contribution was received.
26. For the 2025–2026 cycle, the individual contribution limit is \$3,500 per election. If primary, general, and runoff are each treated as separate elections, an individual could theoretically contribute \$10,500 total ($\$3,500 \times 3$ elections).
27. However, a runoff election in Alabama is triggered only if no candidate receives a majority of votes in the primary. As of September 30, 2025, and as of the date of this Complaint, no primary election had been held; therefore, no runoff had been called and no runoff was certain to occur.

VIOLATIONS OF LAW

COUNT I: Solicitation and Acceptance of Contributions for a Non-Existent Election, in Violation of 52 U.S.C. § 30116(a)(1)(A) and 11 C.F.R. § 110.1(b)

28. While AO 2009-15 permits, under certain limited circumstances, contributions to be accepted for elections that have not yet been scheduled, the facts here present a distinguishable case. The redesignations at issue were not remedial corrections of inadvertent excessive contributions. Rather, they were pre-planned, systematic, and identical across multiple contributors, indicating that the contributions were solicited from the outset at the \$10,500 level with the intent to designate funds across three separate elections, including a runoff election that had not been called and was entirely speculative.
29. The simultaneous, same-day redesignation of every Anderson family contribution, all eight contributions for identical amounts on the same date with identical redesignation structures on the same date, demonstrates that the redesignations were pre-arranged rather than responsive to any excessive contribution situation. The purpose of the redesignation

process under 11 C.F.R. § 110.1(b)(5) is to remedy excessive contributions, not to serve as a vehicle for soliciting and structuring contributions at three times the per-election limit in the first instance.

30. By systematically soliciting contributions of \$10,500 and immediately parking \$3,500 per contributor in a "Runoff" election account, Hudson for Alabama has accepted contributions that, as a practical matter, inflate the committee's reported cash-on-hand and total fundraising figures on its FEC reports, while the funds attributed to the runoff election serve no legitimate campaign purpose unless and until a runoff is actually triggered.
31. This practice violates the spirit and purpose of the contribution limits established by 52 U.S.C. § 30116 and the redesignation provisions of 11 C.F.R. § 110.1(b)(5), which are intended to remedy genuinely excessive contributions, not to engineer maximum contributions from the outset by exploiting speculative future elections.

COUNT II: Misleading FEC Reports in Violation of 52 U.S.C. § 30104

32. Under 52 U.S.C. § 30104, political committees are required to file reports that accurately disclose their receipts, including the amounts and designations of contributions received.
33. By reporting each Anderson family member's contribution as "\$10,500" and simultaneously redesignating portions to a Runoff and General election, Hudson for Alabama creates the public appearance that it has received \$84,000 in individual contributions from the Anderson family, an amount that would substantially boost the committee's apparent fundraising success and cash-on-hand totals in its FEC filings.
34. In reality, only \$28,000 of the Anderson family contributions (the primary-designated portion) is usable for the upcoming primary election. An additional \$28,000 is designated for a general election the candidate may not reach. And \$28,000 is designated for a runoff election that, as of the date of this Complaint, may never occur.
35. This reporting structure, while technically disclosing the redesignations within the filings, creates a misleading impression of the committee's actual financial strength for the election at hand and may constitute a scheme to inflate fundraising totals in violation of the purposes of the FECA's disclosure requirements.

COUNT III: Treasurer Liability

36. Lori Beth Raymond, as treasurer of Hudson for Alabama, is responsible for ensuring the committee's compliance with the FECA's contribution limits and reporting requirements. 52 U.S.C. § 30104(a).
 37. The systematic nature of the redesignation practice described herein, uniformly applied across numerous contributors, on the same dates, for identical amounts, and to the same speculative future elections, demonstrates, at a minimum, a knowing acceptance of contributions structured to exploit the per-election contribution limits by relying on an election (the runoff) that had not been triggered and was not certain to occur.
 38. The Treasurer is personally liable for the committee's failures to comply with the Act.
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RELIEF REQUESTED

WHEREFORE, Complainant respectfully requests that the Federal Election Commission:

1. Find reason to believe that Hudson for Alabama, Lori Beth Raymond (Treasurer), and Jared Hudson (Candidate) violated 52 U.S.C. § 30116(a)(1)(A) and 11 C.F.R. § 110.1(b) by soliciting, accepting, and structuring contributions through a pre-planned redesignation scheme that exploits the per-election contribution limit by designating funds to a runoff election that had not been called and was not certain to occur;
2. Find reason to believe that Hudson for Alabama and Lori Beth Raymond violated 52 U.S.C. § 30104 by filing reports that, while technically disclosing redesignations, create a misleading impression of the committee's fundraising totals and financial strength;
3. Conduct a full investigation into the contribution and redesignation practices of Hudson for Alabama, including whether contributors were solicited from the outset to contribute at the \$10,500 level with the pre-arranged understanding that portions would be designated to a general election and a runoff election;
4. Determine whether the redesignation practice described herein constitutes an impermissible scheme to circumvent the per-election contribution limits of 52 U.S.C. § 30116;
5. Order Hudson for Alabama to refund or return the portions of contributions designated to the "Runoff" election to the extent those redesignations were not genuine, remedial corrections of excessive contributions but were instead pre-planned from the outset;
6. Impose appropriate sanctions, including civil penalties, for any violations found; and
7. Take such further action as may be appropriate, including referral to the Department of Justice if the violations are determined to be knowing and willful. 52 U.S.C. §§ 30109(a)(5)(C), (d)(1).

SUPPORTING DOCUMENTATION

The following publicly available records support the factual allegations in this Complaint and are available for verification at FEC.gov under the committee name "HUDSON FOR ALABAMA" (FEC Committee ID: C00906453):

- FEC Schedule A filings for Hudson for Alabama, including but not limited to Transaction IDs: SA11A.3474, SA11A.3470, SA11A.3488, SA11A.3498, SA11A.3491, SA11A.3493, SA11A.199, SA11A.336, SA11A.338, SA11A.474, SA11A.2588
 - FEC quarterly reports filed by Hudson for Alabama for the periods covering the contributions described herein
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VERIFICATION

I, Dale Shelton Deas, Jr., MD, hereby verify under penalty of perjury pursuant to 18 U.S.C. § 1001 and 28 U.S.C. § 1746 that the statements made in this Complaint are true and correct to the best of my knowledge, and that statements made on information and belief are believed to be true, with the sources of such information identified herein.

Dated: 03/13/2026

Signature: Dale Shelton Deas Jr. MD

Printed Name: Dale Shelton Deas, Jr., MD

Address: 308 Old Mill Ln, Hoover, AL, 35244

Subscribed and sworn to before me this 16th day of March, 2026

Robert K. Glass

Notary Public

My Commission Expires: 07-16-2026

[NOTARY SEAL]

