State Board of Elections
Campaign Finance Division
Memorandum to File

To	File
From	Jane E. Steffens
Date	04/28/2017
Name of Committee	NC Heritage PAC

The following reports were audited:

- 2016 Organizational
- 2016 First, Second, Third and Fourth Quarters

The following issues were found:

- The PAC received multiple in kind contributions from NC Division, Sons of Confederate Veterans, listed as a non-profit group. In order to receive contributions from a non-profit group, that group must meet all criteria set out in G.S. 163-278.19(f) (see attached) – *the Non-profit group has provided a letter, advising that they do meet all criteria as set out in that statute, and so the in kind contributions are considered permissible.*

The following contacts were made with the Committee:

- 03/17/2017 – telephone call made to Michael Flinchum, treasurer
- 03/17/2017 – email sent to Michael Flinchum, treasurer
- 04/28/2017 – letter received from non-profit entity (attached)

Statement of Conclusion

The review of this committee's reports is complete through the 2016 Fourth Quarter Report.

oc. 4-28-17 jes

G.S. 163-278.19(f)

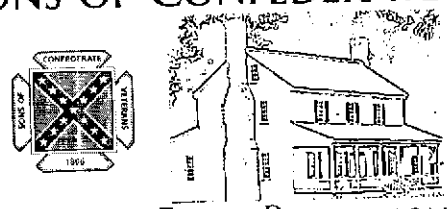
(f) This section does not prohibit a contribution by an [a] person or entity that:

(1) Has as an express purpose promoting social, educational, or political ideas and not to generate business income;

(2) Does not have shareholders or other persons which have an economic interest in its assets and earnings; and

(3) Was not established by a business corporation, by an insurance company, by a business entity, including, but not limited to, those chartered under Chapter 55, Chapter 55A, Chapter 55B, or Chapter 58 of the General Statutes, by a professional association, or by a labor union and does not receive substantial revenue from such entities. Substantial revenue is rebuttably presumed to be more than ten percent (10%) of total revenues in a calendar year.

North Carolina Division
Sons of Confederate Veterans



Historic Oak Grove Plantation, Headquarters
8640 Burnett Road, Godwin, North Carolina

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Campaign Finance Office
NC State Board of Elections

R. Kevin Stone
Commander

Ronald L. Perdue
Lt. Commander

Ronnie S. Roach
Chief of Staff

J. Daniel Bollick
Adjutant

Michael C. Hardy
Historian

Rev. Dr. Herman White
Chaplain

Joey Dickerson
Sergeant-at-Arms

Andrew Johnson
2nd Lt. Commander

Douglas Nash
Public Affairs

Frank Powell
Parliamentarian

Dr. John Booker
Surgeon

Sean K. Lloyd
Judge Advocate

Jake R. Sullivan
Heritage Officer

Samuel T. Currin
Legislative Affairs

Dr. Boyd Cathey
Aide-de-Camp

Greg Parrott
Webmaster

Rev. Kip Vinson
Education

Homer Robbins
Color Sergeant

Bruce Cloninger
Genealogist

Krystal Stone
Aide-de-Camp

Laura Stallard
Shirley White
Matrons of Honor

March 17, 2017

VIA U.S. MAIL

Ms. Jane E. Steffens, Field Auditor
State Board of Elections – Campaign Finance
P.O. Box 27255
Raleigh, NC 27611-7255

Dear Ms. Steffens:

I am writing on behalf of the North Carolina Division, Sons of Confederate Veterans to confirm that our organization, a North Carolina non-profit corporation, meets the criteria prescribed by N.C.G.S. §163-278.19(f).

Accordingly, the North Carolina Division, Sons of Confederate Veterans has an express purpose promoting social and educational ideas and not to generate business income. We do not have shareholders or other persons, which have an economic interest in our assets and earnings. Our organization was not established by a business corporation, by an insurance company, by a business entity (including, but not limited to, those chartered under Chapters 55, 55A, 55B, or 58 of the General Statutes), by a professional association, or by a labor union and we do not receive any revenue from such entities.

In relation to our in-kind contributions to the NC Heritage PAC, I trust the above is sufficient to illustrate our compliance with state campaign finance law and regulations.

Please do not hesitate to let me know if you have any questions or require further information. I can be reached by phone at (919) 721-1231 or email at scvmechcav@hotmail.com.

Best regards,

R. Kevin Stone
Commander