

## Details

**When Sonny Perdue was nominated to be the U.S. Secretary of Agriculture, he and his wife had two trusts. They were co-trustees and the sole beneficiaries of one of the trusts, and his wife was “the trustee and one of the beneficiaries” of the other trust. Sonny Perdue said if confirmed he would revoke these trusts and transfer all of the assets into new trusts that will not benefit him or his wife. He also said he would not serve as a trustee. Sonny Perdue did close the two trusts that existed when he was nominated and created two new trusts, but one of the new trusts benefited him by recently providing him almost \$140,000 in income, and he is a co-trustee of the other trust.**

Perdue Inc. is a trucking company that Sonny Perdue and his wife, Mary, started in 1993 as a “small short hauling operation to assist farmers,” but as the company has moved into other industries it stopped focusing on agriculture. The Federal Motor Carrier Safety Administration now lists Perdue Inc. as a “general freight” company. It does not list it as a carrier of logs, fresh produce, livestock, grain, feed, hay, meat, dry bulk commodities, refrigerated food, paper products and/or agricultural/farm supplies.

Sonny Perdue is also the sole owner of Perdue Properties LLC and Perdue Real Estate Holdings LLLP, which are “empty” companies that have “never held any assets nor engaged in any business.”

Sonny Perdue created the Perdue Family Revocable Management Trust in 2010. He and his wife were “co-trustees and sole beneficiaries of the Perdue Family Revocable Management Trust.” This trust owned 100 percent of the voting stock of Perdue Business Holdings Inc. and 100 percent of Perdue Management Holdings LLC, which was a “dormant” holding company with “no assets or holdings.” He shut down the Perdue Family Revocable Management Trust in July 2017.

Sonny Perdue, at roughly the same time, created the Perdue Family Wealth Preservation Trust. Sonny Perdue’s wife was “the trustee and one of the beneficiaries of the Perdue Family Wealth Preservation Trust,” which owned “FALF and 100% of the non-voting stock in Perdue Business Holdings Inc.” FALF “is a holding company for Soque River Conservation LLC.”

Perdue Business Holdings Inc., in 2017, owned:

- Legacy 13:22 LLC, which was a holding company for TW Rocky Mount Real Estate LLC and TWAS Rocky Mount LLC.
- Perdue Consulting Group LLC, which was not operating and had no clients at the time.
- Benton Global LLC, which was a trucking company that was not operating at the time.
- Benton Logistics LLC, which was a trucking company that was not operating at the time.
- AGrowStar.
- Perdue, Inc.
- Houston Fertilizer and Grain.
- ProAg Products LLC, which was “a grain market trading business.”
- StarPort Logistics LLC.

Perdue Business Holdings Inc. also owned 25 percent of Perdue Partners LLC, which was a “dormant” consulting company. (*The Atlanta Journal-Constitution*, 11/14/10, Sonny Perdue, 2017 and 2019 U.S. Office of Government Ethics Forms 278e, the Federal Motor Carrier Safety Administration Snapshot for USDOT Number [523668](#), LexisNexis Business Reports, and Letter to the U.S. Department of Agriculture Designated Agency Ethics Official, [03/07/17](#))

Donald Trump, on January 19, 2017, “formally announced” that he had “chosen former Georgia governor Sonny Perdue to be his secretary of agriculture.” (*The Washington Post*, [01/19/17](#))

Sonny Perdue wrote on March 7, 2017, “upon confirmation, I will resign from...Perdue Management Holdings LLC...and Perdue Business Holdings, Inc.” He continued, within 90 days of “confirmation, I will cause” the Perdue Family Revocable Management Trust and the Perdue Family Wealth Preservation Trust “to be restructured such that I will revoke the Perdue Family Revocable Management Trust and transfer all of its stock in Perdue Business Holdings, Inc. into a new, irrevocable trust (‘New Family Management Trust’) that will not benefit me or my spouse. Neither I nor my wife will serve as trustee of the New Family Management Trust.”

Perdue continued, within 90 days of “confirmation, the appointment committee for the Perdue Family Wealth Preservation Trust will appoint all of its stock in Perdue Business Holdings, Inc. to a new, irrevocable trust (‘New Wealth Preservation Trust’) that will not benefit me or my spouse. Neither I nor my wife will serve as trustee of the New Wealth Preservation Trust, and the trust document for the New Wealth Preservation Trust will expressly prohibit its appointment committee from appointing trust assets to me or my spouse.” (Letter to the U.S. Department of Agriculture Designated Agency Ethics Official, [03/07/17](#))

Sonny Perdue replaced the Perdue Family Revocable Management Trust and Perdue Family Wealth Preservation Trust with the FALF Management Trust and the FALF Preservation Trust.

Despite writing that he would not “serve as trustee of the New Family Management Trust,” he became a co-trustee of the FALF Management Trust in November 2018. The FALF Management Trust became the owner of Perdue Management Holdings LLC. Perdue Management Holdings LLC was still a “dormant” holding company with “no assets or holdings.”

Sonny Perdue also created the FALF Preservation Trust. Despite writing that the new preservation trust “will not benefit me or my spouse,” he received \$138,179 in income from the FALF Preservation Trust, according to a form he filed with U.S. Office of Government Ethics in 2019.

The FALF Preservation Trust owns FALF, LLC, which “is a holding company for Soque River Conservation LLC,” and “100% of the non-voting stock in Perdue Business Holdings Inc.” Perdue Business Holdings Inc. still owns:

- Legacy 13:22 LLC, which is still a holding company for TW Rocky Mount Real Estate LLC and TWAS Rocky Mount LLC.
- Perdue Consulting Group LLC, which is still dormant.
- Perdue, Inc.
- Houston Fertilizer and Grain.

- StarPort Logistics LLC, which he describes on financial disclosures as “an operating logistics company.” It owns a 2006 Van’s RV-7/7A, which is a two-seat, single engine, fixed wing kit plane, and a 2019 Van’s RV-10, which is a four-seat, single engine, fixed wing kit plane.

Perdue Business Holdings Inc. now also owns through Legacy 13:22 LLC:

- TW Apex Real Estate LLC.
- TWAS Apex LLC.
- TWAS Camden LLC.
- TW Camden Real Estate LLC.
- TW Pinehurst Real Estate LLC.
- TWAS Pinehurst LLC.
- Perdue Partners LLC, which is still a “dormant” entity.

Perdue Business Holdings Inc. no longer owns:

- Benton Global LLC.
- Benton Logistics LLC.
- ProAg Products LLC, which was administratively dissolved in August 2019.
- AGrowStar, which was sold in December 2017. (Sonny Perdue, 2019 U.S. Office of Government Ethics Form 278e, Georgia Corporation Commission Records for [ProAg Products LLC](#), Federal Aviation Administration Registry Records for [N7429S](#) and [972PG](#), and FlightAware Records for [N7429S](#) and [N972PG](#))

**“As part of an agreement struck with the Office of Government Ethics” while being considered for U.S. Secretary of Agriculture by the U.S. Senate, Sonny Perdue agreed to “put his assets into a blind trust.” He did not do so.**

A blind trust is “a valuable tool for public officials to prevent a conflict of interest or the appearance of a conflict of interest.”

A blind trust keeps a “certain kind of information – like asset makeup and management – secret from trust beneficiaries. With a blind trust, the beneficiaries do not know the assets held in trust and they have no power to participate in the management or distribution of those assets. The control of the blind trust is held by a trustee (or trustees) who typically has complete discretion over the trust management.” (*Forbes*, [01/12/17](#))

“As part of an agreement struck with the Office of Government Ethics” while being considered for U.S. Secretary of Agriculture by the U.S. Senate, Sonny Perdue agreed to “put his assets into a blind trust in order to avoid any real or perceived conflict of interest, according to an official with President Donald Trump’s transition team who was not authorized to speak on the record.” (*The Atlanta Journal-Constitution*, [03/12/17](#))

However, Sonny Perdue lists the assets of the FALF Management Trust and the FALF Preservation Trust on his financial disclosures. (Sonny Perdue, 2019 U.S. Office of Government Ethics Form 278e)

**Instead of separating himself from Houston Fertilizer & Grain and Perdue Business Holdings Inc., Sonny Perdue made his children and their spouses officers of these businesses.**

Daniel Perdue, Lara Perdue, and George Perdue IV are children of Sonny Perdue. Daniel's wife is Jessica Perdue. Michael Ghioto is married to Lara Perdue. (Governor Sonny Perdue, Press Releases, [12/11/05](#) and [07/19/10](#), and *Baptist Press*, [04/28/17](#))

Sonny Perdue, in 2016, was the CEO and CFO of Houston Fertilizer & Grain. In 2017 and 2018, Jessica Perdue was the Secretary, Daniel Perdue was the CEO, and Michael Ghioto was the CFO. In 2019, Jessica Perdue was still the Secretary, Daniel Perdue was still the CEO, and George Perdue IV replaced Michael Ghioto as CFO. Today, Jessica Perdue is still the Secretary, Daniel Perdue is still the CEO, and George Perdue IV is still the CFO. (Georgia Corporation Commission Records for [Houston Fertilizer & Grain](#))

Sonny Perdue, in 2016, was the CEO, CFO, and Secretary of Perdue Business Holdings Inc. In 2017, Daniel Perdue was the CFO, Michael Ghioto was the CEO, and George Perdue IV was the Secretary. In 2018, Daniel Perdue was the CEO, Michael Ghioto was the CFO, and George Perdue IV was the Secretary. In 2019, Daniel Perdue was the CEO and CFO, and George Perdue IV was the Secretary. Today, Daniel Perdue is still the CEO and CFO, and George Perdue IV is still the Secretary. (Georgia Corporation Commission Records for [Perdue Business Holdings Inc.](#))

**Sonny Perdue recently received \$138,179 in income from Soque River Conservation LLC from the “sale of conservation mitigation bank credits” that were “created under a formal agreement” with and regulated by the U.S. Army Corp of Engineers (USACE). Sonny Perdue has advocated for policies that would increase the value of Soque River Conservation LLC mitigation bank credits. Soque River Conservation LLC, in 2018, asked USACE to change its mix of mitigation bank credits in a way that would increase their value by an estimated \$2.9 million. USACE, which works closely with the U.S. Department of Agriculture on various issues, including “wetlands creation, restoration and enhancement,” made the change to increase the value of the Soque River Conservation LLC mitigation bank credits.**

Sonny Perdue, since becoming the U.S. Secretary of Agriculture in 2017, created the FALF Preservation Trust, which recently received \$138,179 in income, according to a form he filed with the U.S. Office of Government Ethics in 2019. The \$138,179 in income is from Soque River Conservation LLC, which “is owned by FALF LLC.” FALF LLC “is a single member Limited Liability Company owned by [the] FALF Preservation Trust.” (Sonny Perdue, 2019 U.S. Office of Government Ethics Form 278e)

Soque River Conservation LLC, which was previously owned by the Perdue Family Wealth Preservation Trust through FALF, LLC, receives income from the “sale of conservation mitigation bank credits” to offset adverse environmental impacts by development. (Sonny Perdue, 2017 U.S. Office of Government Ethics Form 278e, and *Soque River Watershed Association News*, [09/17/14](#))

“Private and public projects often cause adverse impacts to aquatic and biological resources even after implementing the best avoidance and minimization practices available. These...impacts typically require compensatory mitigation to ensure that the ecological losses are offset and do not result in a net loss of natural resources. A mitigation bank is a resource area that has been restored, established, enhanced, or in some circumstances, preserved for the purpose of providing compensation for these unavoidable impacts permitted under the Clean Water Act, Endangered Species Act, or a similar state or local regulation.

There are two types of mitigation banks, wetland or stream banks, which offer credits to offset losses to aquatic resources.”

“Impacts to aquatic resources are regulated and approved by the USACE and USEPA.”

“Mitigation banks are created under a formal agreement with these regulatory agencies, who must review and approve the ecological assessment techniques to certify that the credits offered provide the required ecological functions to offset impacts.” ([The Westervelt Ecological Services Internet Site](#))

As credits are sold to offset development impacts, “they are subtracted from the bank until all the available credits are purchased.” The price of each credit is “negotiated between the buyer and seller.” ([The U.S. Department of Agriculture’s Conservation Compliance and Wetland Mitigation Banking Internet Site](#))

“Building a reservoir is destructive, flooding acres of wetlands and stream beds. Federal law requires that if wetlands and stream beds are harmed, the damage must be offset by construction of replacement wetlands and the repair of damaged streams in the same watershed. That’s where wetlands mitigation banks come in. Mitigation bankers buy agricultural property that includes drained, nonfunctional wetlands and damaged stream beds. They restore the wetlands, plant native vegetation and repair the streams’ natural functions. In return, the federal government grants the mitigation bank what are known as wetland or stream mitigation credits. If a developer needs to destroy wetlands, he can turn to a mitigation bank and purchase credits to offset the damage. For example, a mitigation bank that restores a one-acre wetland in North Georgia can generate wetlands credits worth \$100,000 to a developer.”

Sonny Perdue has “advocated construction and expansion of reservoirs in North Georgia to ‘drought-proof’ metro Atlanta.” (*The Atlanta Journal-Constitution*, 12/17/10)

He backed legislation that included provisions to “set up a joint House and Senate committee to find new sources of water, including building new reservoirs or expanding existing ones.” (*The Atlanta Journal-Constitution*, 02/04/10)

“On July 9, 2009, Perdue and a partner, Aaron McWhorter, bought a 157-acre parcel of agricultural property in Habersham County along the Soque River for \$3.7 million, according to the Habersham County Tax Assessors Office. On Oct. 20, 2010, the U.S. Army Corps of Engineers issued a request for public comment on a proposal by the McWhorter-Perdue partnership to convert the Soque River property into a wetlands mitigation bank. Based on

conservative estimates by industry experts [at the time], the bank could eventually generate more than \$6 million in credits.”

“A boom in reservoir construction could” increase the value of Sonny Perdue’s Soque River mitigation bank, “because under federal regulation, mitigation credits must be generated in the same watershed in which they are used.” (*The Atlanta Journal-Constitution*, 12/17/10)

By 2014, the conversion of the McWhorter-Perdue land from a “sod farm along the Soque River in Clarkesville...into a Mitigation Bank” was underway. (*Soque River Watershed Association News*, [09/17/14](#), and *The Northeast Georgian*, 09/20/14)

The McWhorter-Perdue Soque River Conservation LLC land is in the Savannah District. Soque River Conservation LLC, in 2018, asked USACE to increase its wetland credits by 59.12 to 330.71, and decrease its stream credits by 616.01 to 73,873.70. USACE approved the change.

A 2015 University of Georgia study estimated that stream credits in the Savannah District are worth \$75 per credit and wetland credits are worth \$7,500 per credit. Assuming the estimates from the University of Georgia are accurate, the change approved by USACE increased the value of the Soque River Conservation LLC mitigation bank from approximately \$7.6 million to approximately \$8.0 million.

According to a 2019 Georgia Department of Transportation interoffice memo, in the Savannah District stream credits are worth \$38 per credit and wetland credits are worth \$50,000 per credit. Assuming these estimates are accurate, the change approved by USACE increased the value of the Soque River Conservation LLC mitigation bank by approximately \$2.9 million, from approximately \$16.4 million to approximately \$19.3 million. (USACE SAS-2010-00442, [07/09/18](#), the USACE Regulatory In-Lieu Fee and Bank Information Tracking System, Permit Number [201000442](#), the [2015 University of Georgia Cochran’s Creek Case Study](#), and Georgia Department of Transportation Interoffice Memo, P.I. # [001757](#), Page 60 of 383)

USACE and the U.S. Department of Agriculture’s Natural Resources Conservation Service have “a long-term working relationship to improve the management of water and related natural resources under the missions and authorities of NRCS and USACE.” They “work together” on various issues, including “wetlands creation, restoration and enhancement.” ([The U.S. Department of Agriculture’s Internet Site](#))

**Archer Daniels Midland, approximately one month after Donald Trump announced that he had “chosen former Georgia governor Sonny Perdue to be his secretary of agriculture,” sold six parcels of land in Hampton County, SC, to AGrowStar, which at the time was still owned by Sonny Perdue, for a fraction of what Archer Daniels Midland paid for it in 2010. Such transactions in Hampton County regularly include the name of the seller and transaction price on the county Internet site, but in this case they are listed as “Not Available,” which creates the impression that Archer Daniels Midland and/or AGrowStar are trying to hide the details of the transaction.**

Donald Trump, on January 19, 2017, “formally announced” that he had “chosen former Georgia governor Sonny Perdue to be his secretary of agriculture.” (*The Washington Post*, [01/19/17](#))

# ACCOUNTABLE<sup>US</sup>

Archer Daniels Midland, on February 27, 2017, sold six parcels of land to AGrowStar in Hampton County for \$250,000. Archer Daniels Midland purchased these parcels on December 15, 2010, for \$5,525,855. (Hampton County Land Records, [Book 50, Deed 438](#), and [Book 212, Deed 370](#))

Such transactions in Hampton County typically include the name of the seller and transaction price on the county Internet site, but in this case they are listed as “Not Available.” (Hampton County Parcel Record Cards for Parcel Numbers [049-07-10-003](#), [049-07-18-001](#), [049-07-19-004](#), [049-07-20-001](#), [049-07-20-013](#), and [050-03-01-006](#))

On February 27, 2017, Sonny Perdue still owned AGrowStar. More specifically, Sonny Perdue, before he was the Secretary of Agriculture, was “the managing member of AGrowStar, which purchases and stores corn, wheat and soybeans from farmers, then markets and sells the crops to processors, said Danny Brown, the company’s president. The company has about 3 million bushels of storage capacity at 11 sites in Georgia and South Carolina, Brown said” in 2017. (Various Georgia and South Carolina Property Records, *The Atlanta Journal-Constitution*, [01/20/17](#), and the [AGrowStar Internet Site](#))

“‘We are mainly a corn, wheat and soybean operation,’ Brown said. ‘We’ll certainly handle any type of grain. We’ll handle oats, we’ll handle soybean meal or grain sorghum, but that takes care of 95% of our business.’” (*Progressive Farmer*, [01/18/17](#))

AGrowStar supplies “fertilizer and seed to farmers across the region, and then purchases the grain they produce in order to resell it to larger conglomerates like ConAgra and Archer Daniels Midland.” In other words, AGrowStar is a middleman “in the international commodity foods chain.” (*Modern Farmer*, [01/19/17](#))

“AGrowStar grew out [of] a grain and fertilizer business Perdue’s family built that later bought and merged with a group of grain elevators in 2000 that had been called Milner Grain.” (*Progressive Farmer*, [01/18/17](#))

More specifically, it grew out of Houston Fertilizer & Grain, which was a grain elevator business that Sonny Perdue co-founded in the 1970s. (*The Macon Telegraph*, 01/06/03, and *The Atlanta Journal-Constitution*, 01/18/09)