State Ethics Commission

200 Piedmont Avenue SE | Suite 1416, West Tower | Atlanta, Georgia 30334 | 404-463-1980 | www.ethics.ga.gov

COMPLAINT FORM

Alleging a Violation of the Georgia Government Transparency and Campaign Finance Act

JURISDICTION: This office has jurisdiction ONLY in matters involving financial disclosure, campaign finance, and lobbyist disclosure. O.C.G.A. §45-1-6 covers state vendor disclosure law as outlined in the Campaign Finance Act in O.C.G.A. Title 21-5 et seq and O.C.G.A. §45-1-6 covering state vendor disclosure law. Please ensure that your complaint is within the Commission's jurisdiction.

Mail or hand delivery original signed/notarized form and attachments to above address. I. PERSON BRINGING COMPLAINT = COMPLAINANT: Name: **Address:** City: State: **County:** Zip: **Telephone:** E-mail (optional): II. PARTY AGAINST WHOM COMPLAINT IS BROUGHT = RESPONDENT: Name: **Address:** City: State: **County:** Zip: **Telephone:** Title of office held or sought: (if applicable) **III. STATEMENT OF FACTS:** State the actions of the Respondent upon which your complaint is based along with an ALLEGATION that such facts constitute one or more violations of the Georgia Government Transparency and Campaign Finance Act. See JURISDICTION above. Include relevant dates and the names and addresses of other persons who you believe have knowledge of the facts and attach any documentation/evidence that support the facts alleged in this complaint. Please see § 21-5-6.23 regarding attorneys' fees. (If continued on other side or additional paper, please check here IV. VERIFICATION BY OATH OR AFFIRMATION - ORIGINAL NOTARY & SIGNATURES REQUIRED STATE OF COUNTY OF I, the undersigned Complainant, being duly sworn, depose (affirm) and say that the information in this Complaint is true and correct to the best of my knowledge and belief. Notary Stamp/Crimp: Sworn to and subscribed before me SIGNATURE AND STATEMENT OF COMPLAINANT: οn ☐ I AM, ☐ I AM NOT, in filing this complaint acting as an agent, paid or otherwise, for any other person. Signature of Notary Public My Commission Expires: DATE:

PENALTIES: False Swearing: A person to whom a lawful oath or affirmation has been administered or who executes a document knowing that it purports to be an acknowledgment of a lawful oath or affirmation commits the offense of false swearing when, in any matter or thing other than a judicial proceeding, he knowingly and willfully makes a false statement under Code Section 16-10-71. A person convicted of the offense of false swearing shall be punished by a fine of not more than \$1,000.00 or by imprisonment for not less than one nor more than five years, or both.

Complaint Form (Continued)

6.) Respondent solicited, accepted, and received twenty-nine campaign contributions on the following dates before filing his Declaration of Intent To Seek Campaign Contributions, which was filed on May 11, 2011.

Date of Contribution	Contributor	Don	ation Amount
3/30/2021	National Landscape LLC	\$	1,000.00
4/5/2021	Jay Gemes	\$	200.00
4/7/2021	Erik Mueller	\$	500.00
4/8/2021	Roger Wise	\$	200.00
4/12/2021	Robert and Karen Christanell	\$	500.00
4/12/2021	John Schult	\$	20.00
4/14/2021	Joel Evans	\$	250.00
4/16/2021	Rod Miller	\$	100.00
4/20/2021	Steven Kramer	\$	500.00
4/22/2021	Kim Swindall	\$	1,000.00
4/23/2021	Trudy Bradley	\$	200.00
4/24/2021	David and Nancy Leloup	\$	1,500.00
4/24/2021	Frank Fitzgerald	\$	250.00
4/27/2021	Edward and Mary Jo Malowney	\$	1,000.00
4/27/2021	James and Sandra Hamby	\$	200.00
4/28/2021	Thomas Polizzi	\$	50.00
4/28/2021	Paul Romano	\$	25.00
4/28/2021	Richard Zahnow	\$	50.00
4/29/2021	Joesph Macrina	\$	250.00
4/30/2021	Charles and Victoria Beam	\$	500.00
4/30/2021	Michelle Sarkisian	\$	50.00
4/30/2021	Jon Davis	\$	500.00
4/30/2021	Molly Swindall	\$	5.00
4/30/2021	Stephanie Beard	\$	50.00
4/30/2021	Robert Frame	\$	500.00
4/30/2021	Tom Rouse	\$	750.00
5/3/2021	James Gottschalk	\$	100.00
5/4/2021	Mervin Brown	\$	250.00
5/5/2021	Lawrence Okeson	\$	100.00
	Diversion From Council Race to Mayor	\$	2,955.29
	TOTAL	\$	13,555.29

- 7.) Respondent failed to file CCDR Reports for Johns Creek City Council Post 3 for the following periods:
- a. April 2021
- b. June 2021
- c. September 2021
- d. October 2021
- e. December 2021
- f. June 2022
- g. December 2022
- h. June 2023
- i. December 2023
- j. June 2024
- k. December 2024
- l. January 2025
- m. April 2025
- n. June 2025
- 8.) Respondent failed to file the required yearly Personal Financial Disclosure Statement for the year 2021.
- 9.) Respondent failed to comply with section three of identification of disclosing of general description of property of Direct Ownership Interests in Real Property for the following years for property referred to as the "Fulton, GA The Gathering.":
- a. 2023
- b. 2024
- c. 2025
- 10.) Respondent failed to file Personal Financial Disclosure Statement by the required deadline for the following years:
- a. 2020
- b. 2022
- c. 2023