BEFORE THE STATE ETHICS COMMISSION

STATE OF GEORGIA

In the matter of: Glenn Richardson	Georgia State Ethics Commission Number _____

COMPLAINT

Pursuant to the Ethics in Government Act and the Rules and Regulations of the State Ethics Commission, complainant asks that the State Ethics Commission investigate the following matters.

The name and address of the person or persons filing this complaint:

Bobby Kahn
Democratic Party of Georgia
1100 Spring Street NW
Suite 408
Atlanta, GA 30309

Name and address of the party against whom the Complaint is filed:

Glenn Richardson
P.O. Box 197
Dallas, GA 30132

The factual allegations made in this Complaint pertain to matters that constitute violations of law that are within the jurisdiction of the State Ethics Commission.

Statement of Facts:

Glenn Richardson abused his office by entering into an inappropriate relationship with a lobbyist and acting on behalf of that lobbyist's employer. Rep. Richardson was ethically obligated to serve the interests of the people of the State of Georgia. Instead, he acted in a manner inappropriate to his office. Specifically, Speaker Richardson co-sponsored House Bill 1325 during the 2006 legislative session. That bill would have financed a $300 million pipeline for Atlanta Gas Light. It is common knowledge that Speaker Richardson engaged in a personal relationship with a lobbyist for the utility advocating passage of the bill. This action constituted a clear conflict of interest.

(b) Glenn Richardson filed campaign disclosure statements that failed to comply with the requirements of the Ethics in Government Act and of the Rules and Regulations promulgated by the Ethics Commission. He operated MMV Alliance Fund, P.O. Box 197, Dallas, GA 30132, which repeatedly filed disclosure statements that did not comply with the terms of the Act.

FAILURE TO ITEMIZE

The Rules of the Ethics Commission require that when a campaign "pays for goods and services directly or indirectly by using a credit card merely as a conduit through which funds are paid to an end-recipient, the expenditure must be itemized and the shall be shown on the campaign contribution disclosure report in the time period it is incurred." Rule 189-3-04(1)(a).

The June 30, 2005 Non-election Year Disclosure Report filed by Rep. Richardson on behalf of MMV failed to itemize numerous credit card transactions:

American Express Post Office Box 650448 Dallas, TX 75265	02/01/2005	$1,712.27
American Express Post Office Box 650448 Dallas, TX 75265	04/21/2005	$1,925.75
American Express Post Office Box 650448 Dallas, TX 75265	03/24/2005	$858.50

FAILURE TO IDENTIFY END-RECIPIENT

The Rules of the Ethics Commission require that when a campaign uses a credit card then "[t]he campaign disclosure report shall identify ... each end-recipient ... and shall include the following: ... 4. name of each end-recipient and occupation if an individual; 5. complete mailing address of each end-recipient...." Rule 189-3-04(1)(b). Instead of identifying the end-recipient, and

providing the detail required by the Rule, Richardson's MMV disclosure chose to simply describe the use:

American Express Post Office Box 650448 Dallas, TX 75265	02/01/2005	$1,712.27	Staff conference travel & lodging
American Express Post Office Box 650448 Dallas, TX 75265	04/21/2005	$1,925.75	Event Lodging
American Express Post Office Box 650448 Dallas, TX 75265	03/24/2005	$858.50	Staff Lodging & Travel

In his personal June 30, 2005 Non-election Year Disclosure Report, Richardson named an end-recipient but failed to provide the complete address as required by the rules:

American Express Post Office Box 650448 Dallas, TX 75265	05/31/2005	$1,065.74	For further payment to: Marriott Hotel - Savannah / Lodging, Delta Airlines - Atlanta / irfareReynolds Plantation / Lodging, Hertz Car Rental / Rental Car

FAILURE TO IDENTIFY AMOUNT OF PAYMENTS TO END-RECIPIENT

The Rules of the Ethics Commission require that when a campaign uses a credit card then "[t]he campaign disclosure report shall identify ... each end-recipient ... and shall include the following: ... 6 amount of payment to each end-recipient...." Rule

189-3-04(1)(b). Nothing in the disclosure even hints at the amount of payment by MMV to the end-recipient:

American Express Post Office Box 650448 Dallas, TX 75265	02/01/2005	$1,712.27	Staff conference travel & lodging
American Express Post Office Box 650448 Dallas, TX 75265	04/21/2005	$1,925.75	Event Lodging
American Express Post Office Box 650448 Dallas, TX 75265	03/24/2005	$858.50	Staff Lodging & Travel

Richardson committed the same violation in his personal campaign disclosure report:

American Express Post Office Box 650448 Dallas, TX 75265	05/31/2005	$1,065.74	For further payment to: Marriott Hotel - Savannah / Lodging, Delta Airlines - Atlanta / irfareReynolds Plantation / Lodging, Hertz Car Rental / Rental Car

These are classic deceptions that the detail rules are designed to prevent.

FAILURE TO DESCRIBE GOODS OR SERVICES PROVIDED BY END-RECIPIENT

The Rules of the Ethics Commission require that when a campaign uses a credit card then "[t]he campaign disclosure report

shall identify … each end-recipient … and shall include the following: … 7. description of the goods or services provided by each end-recipient with sufficient detail to identify it as a lawfully authorized use of campaign funds." Rule 189-3-04(1)(b). While the MMV disclosure does hint at the use, nothing provides the detail required of such disclosures:

American Express Post Office Box 650448 Dallas, TX 75265	02/01/2005	$1,712.27	Staff conference travel & lodging
American Express Post Office Box 650448 Dallas, TX 75265	04/21/2005	$1,925.75	Event Lodging
American Express Post Office Box 650448 Dallas, TX 75265	03/24/2005	$858.50	Staff Lodging & Travel

American Express Post Office Box 650448 Dallas, TX 75265	05/31/2005	$1,065.74	For further payment to: Marriott Hotel - Savannah / Lodging, Delta Airlines - Atlanta / irfareReynolds Plantation / Lodging, Hertz Car Rental / Rental Car

Name and address of all other persons who have firsthand knowledge of the facts alleged in the complaint:

Kenneth G. Vinson
P.O. Box 197
Dallas, GA 30132

Glenn Richardson
P.O. Box 197
Dallas, GA 30132

Documentary evidence supporting the facts alleged in the complaint:

A copy of the inaccurate disclosure filed by Glenn Richardson can be found at HYPERLINK "http://www.sos.state.ga.us/cgi-bin/ElectronicFilingResultsBySequenceNo.asp?FileName=17285a5o00000.txt&DateTimeStamp=7/8/2005%204:42:00%20PM" http://www.sos.state.ga.us/cgi-bin/ElectronicFilingResultsBySequenceNo.asp?FileName=17285a5o00000.txt&DateTimeStamp=7/8/2005%204:42:00%20PM

This complaint is made under oath, pursuant to the Rules and Regulations of the State Ethics Commission. Having been duly sworn, I state that the facts and allegations contained in the foregoing Complaint are true to the best of my knowledge and belief.

This ____ day of January 2007

_____
Bobby Kahn

Democratic Party of Georgia
1100 Spring Street NW
Suite 408
Atlanta, GA 30309

Sworn to and subscribed
before me, this _____ day of
January 2007.

_____
Notary Public

My Commission Expires:_____