

Before the State Ethics Commission  
State of Georgia

Complaint against Governor Sonny Perdue, John Watson, James N.  
Ayers and Perdue PAC

**1. Name and address of person filing the complaint.**

Bobby Kahn  
25 Whitlock Place SW  
Suite 201  
Marietta, GA 30064

**2. Name and address of the party against whom the complaint is filed.**

Governor Sonny Perdue  
State Capitol  
Atlanta, GA 30334

John Watson  
Chairman  
Perdue PAC  
3110 Maple Drive  
Atlanta, GA 30305

James N. Ayers  
Treasurer  
Perdue PAC  
3110 Maple Drive  
Atlanta, GA 30305

Perdue PAC  
3110 Maple Drive  
Atlanta, GA 30305

**3. Clear and concise statement of the facts upon which the complaint is based along with an allegation that such facts constitute one or more violations of law.**

"Perdue PAC is a political organization registered as a § 527 organization with the I.R.S. and as a political action committee with the Georgia State Ethics

Commission.” (Fact Sheet: Perdue PAC event supporting Governor Sonny Perdue, attached as Exhibit A).

According to the website of the State Ethics Commission, Perdue PAC registered on April 12, 2007, and filed its mid-year report on July 7, 2007. According to the State Ethics Commission website, no year-end report was filed pursuant to the Ethics in Government Act. The Ethics Commission confirms that no report has been received in its office. (Affidavit of Christopher Huttman, attached as Exhibit B).

The year-end report should reflect contributions received for the period July 1, 2007, through December 31, 2007. A search of expenditures from other entities to Perdue PAC reveals the following contributions to Perdue PAC:

12/20/07	AirTran Airways	\$10,000
12/14/07	Survey and Mapping PAC	\$1,000
12/31/07	Donald M Leeburn, Jr.	\$25,000

Printout of website search, attached as Exhibit C. Perdue PAC may have received additional contributions, either from persons or entities not subject to disclosure, or contributors who share Governor Perdue’s disregard for campaign finance laws, and have not filed the required disclosures.

Unfortunately, Governor Perdue and his associates have a long history of contempt for the Ethics in Government Act. Governor Perdue is the first Governor in the history of Georgia to have been convicted of violating the Ethics in Government Act. Evidently, the fine was not a sufficient deterrent, as he is back before the Commission again. His Chief Operating Officer is before this Commission, having failed to disclose more than 60 stock holdings that were required to be disclosed by the Ethics in Government Act. A fine of at least \$15,000 is in order, using the standard of \$250 per omission.

#### **4. General reference to applicable law.**

O.C.G.A § 21-5-34 requires periodic filing of disclosure reports by PACs.

#### **5. Any further information supporting the allegations in the complaint, including the names and addresses of all persons with firsthand knowledge of the facts in the complaint and any documentary evidence supporting the complaint.**


Affidavit of Christopher Huttman, Exhibit B. Mr. Huttman checked the records and found that no disclosure had been filed on the date required by law, or since that date.

Copy of first page of Perdue PAC website is attached as Exhibit D.  
([www.PerduePAC.com](http://www.PerduePAC.com))

**6. Sworn verification and signature of the complainant.**

I solemnly swear that the information provided by me in this complaint is true and accurate to the best of my knowledge.

This 21 day of February, 2008.

  
\_\_\_\_\_  
Bobby Kahn

Sworn to and subscribed before me, a notary public in the State of Georgia, this 21 day of February, 2008.

  
\_\_\_\_\_  
Donna McGinnis



# PERDUE

## **Fact sheet: Perdue PAC event supporting Governor Sonny Perdue**

**Who:** Georgia Governor Sonny Perdue and First Lady Mary Perdue

**What:** Reception and Dinner supporting PERDUE PAC

**When:** January 7<sup>th</sup>, 6pm Reception; Event Chairs, Co-chairs and Hosts are invited to dinner immediately following

**Where:** 103 West, 103 West Paces Ferry Road, Atlanta, GA. 30305

**Event Chairs: Raise/Donate \$25,000**

**Event Co-chairs: Raise/Donate \$15,000**

**Hosts: \$10,000**

**Reception: \$5,000**

### **What is Perdue PAC?**

Perdue PAC is a political organization registered as a § 527 organization with the I.R.S. and as a political action committee with the Georgia State Ethics Commission.

### **What are the funds used for?**

The funds are used to support the political activities of Georgia Governor Sonny Perdue and elect like-minded conservative, principled candidates within the State and across the country

### **What are the contribution limits?**

There are no contribution limits to Perdue PAC. Perdue PAC may accept unlimited corporate and personal contributions.

### **Where do I call to pledge support or ask questions?**

Please send your pledge to Jamie Ayers at [jamieayers@gmail.com](mailto:jamieayers@gmail.com) or call 478-952-7764 no later than Friday, December 14<sup>th</sup>, 2007.

**Paid for by Perdue PAC \* Your contribution is not tax deductible under Federal or State Law \* 3110 Maple Drive, Atlanta, GA. 30305 \* 770-220-0210 \* [www.perduepac.com](http://www.perduepac.com)**

**Exhibit A**

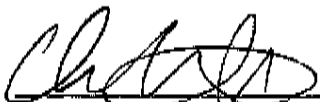
**Exhibit B**

**State of Georgia  
County of Cobb**

My name is Christopher Glynn Huttman. I am over the age of eighteen, suffer no legal disabilities, have personal knowledge of the facts set forth below, and am competent to testify. I state as follows:

On February 20, 2008, at approximately 1:30 PM, I entered into the offices of the State Ethics Commission in Suite 1416 of the West Tower of 200 Piedmont Avenue, Atlanta, GA 30334 to request a printed copy of a number of December, 2007 campaign finance disclosures, including Perdue PAC.

The commission had no record, electronic or paper, of receipt of the December 2007 report for Perdue PAC.

  
\_\_\_\_\_  
Signature of affiant

Christopher Glynn Huttman  
Name of affiant

5300 Peachtree Rd Unit 3301  
Address, line 1

Chamblee, GA 30341  
Address, line 2

Subscribed and sworn to before me, this 20<sup>th</sup> day of February 20 08.

  
\_\_\_\_\_  
Signature of Notary

Donna McGinnis  
NOTARY PUBLIC



My commission expires: \_\_\_\_\_



SEC MAIN | CAMPAIGN REPORTS | PERSONAL FINANCE | LOBBYIST REPORTS | LATE/NON-FILERS  
 BY NAME | BY OFFICE | BY CONTRIBUTIONS | BY EXPENDITURES | REPORT LOG | SUMMARY

**CAMPAIGN REPORTS - EXPENDITURE SEARCH RESULTS**

**CLICK HERE TO EXPORT THE RESULT TO EXCEL**

**Exhibit C**

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Filer	Recipient	Date / Type	Occupation and/or Employer	Purpose	Item Amount	Amount
NC2006000298 AirTran Airways, Inc	Perdue PAC 3110 Maple Drive Atlanta, GA 30305	12/20/2007 Expenditure		Perdue PAC event supporting Gov. Sonny Perdue	\$0.00	\$10,000.00
NC2006000065 Surveying & Mapping Political Action Committee	Perdue PAC 3110 Maple Drive Atlanta, GA 30305	12/14/2007 Expenditure		Contribution	\$0.00	\$1,000.00
NC2006000413 Donald M Leebern Jr	Perdue PAC 3110 Maple Drive Atlanta, GA 30305	12/31/2007 Expenditure		Contribution	\$0.00	\$25,000.00

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# PERDUE PAC

  
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Official Website of Georgia's  
Governor Sonny Perdue

Republican Governors Association

Georgia Republican Party

## Latest News

Governor Perdue Announces Water Talks Extended  
2/15/2008

Governor Perdue Announces IE2 Partnership  
Legislation 2/13/2008

Governor Perdue Announces Filing of the Landowners  
Protection Act 2/12/2008

Governor Perdue Signs Water Plan into Law 2/6/2008

Legislation Introduced to Eliminate State Portion of  
Property Tax 1/31/2008

Governor Announces Healthcare Reform to Insure More  
Georgians 1/30/2008

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## Blog

Welcome! 7/11/2007

Paid for by Perdue PAC

## Exhibit D