

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:	William Perry, Georgia Ethics Watchdogs				
Address:	250 Little Street, A-207				
City:	Athens	State:	GA	County:	Clarke
Zip:	30605				
Telephone:	(678) 358-6966	E-mail (optional):	watchdogwilliam@gmail.com		

II. PARTY AGAINST WHOM COMPLAINT IS BROUGHT = RESPONDENT:

Name:	Maryline Blackburn, Smyrna City Council Ward 3				
Address:	1034 Huntington Trace SE				
City:	Smyrna	State:	GA	County:	Cobb
Zip:	30082				
Telephone:	(678) 707-0065				
Title of office held or sought: <small>(if applicable)</small>	Smyrna City Council Ward 3				

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.

See attached.

(If continued on other side or additional paper, please check here)

IV. VERIFICATION BY OATH OR AFFIRMATION – ORIGINAL NOTARY & SIGNATURES REQUIRED

STATE OF Georgia COUNTY OF Athens-Clarke

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.

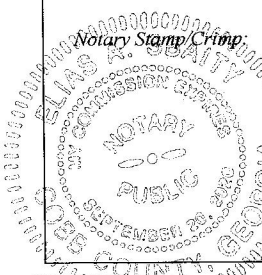
Sworn to and subscribed before me on October 24, 2019

[Signature of Notary Public]
 Signature of Notary Public

My Commission Expires: 9/20/2020

SIGNATURE AND STATEMENT OF COMPLAINANT:
 I AM, I AM NOT, in filing this complaint acting as an agent, paid or otherwise, for any other person.

[Signature of William Perry]
 DATE: 10/24/2019



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.



**Georgia Government Transparency and Campaign Finance Commission
Ethics Complaint – Statement of Facts – Maryline Blackburn, 10/24/2019
Submitted by William Perry, Georgia Ethics Watchdogs**

Part Three: Statement of Facts

I believe that Smyrna City Councilmember for Ward 3, Maryline Blackburn violated the Georgia Ethics in Government Act by:

- 1) Failing to disclose in-kind and/or expenses for her campaign office located on Concord Road on her campaign disclosure reports, and,
- 2) Exceeding in-kind contribution amounts for that office space if it was indeed an in-kind contribution, and,
- 3) Repeatedly omitting address and employer information on several campaign reports for donors, only reporting a name and dollar amount, and,
- 4) Seemingly failing to file several campaign finance disclosure reports.

I have included several Personal Financial Disclosure Statements as well as Campaign Contribution Disclosure Reports for examples, which also include the list of the campaign office. Also enclosed is a screenshot identifying the Concord Road office as the “campaign headquarters”.