

**BEFORE THE STATE ETHICS COMMISSION
STATE OF GEORGIA**

IN THE MATTER OF:

CASE NO.: 25-0060-C

**GEORGIA REPUBLICAN
ASSEMBLY, INC.**

AND

**GEORGIA REPUBLICAN
ASSEMBLY PAC, LLC.**

*
*
*
*
*
*
*
*
*

FIRST AMENDED COMPLAINT

COMES NOW, the Georgia Ethics Commission (“Commission”) and files this Complaint against the Georgia Republican Assembly, Inc. and the Georgia Republican Assembly PAC, LLC. and asserts the following:

1.

Georgia Republican Assembly, Inc. (“GRA”) registered with the Georgia Secretary of State as a Domestic Non-Profit Corporation on May 29, 2013. Its corporate purpose is advancing the interests of the Republican Party in Georgia, to include supporting Republican political campaigns. GRA has renewed its annual registration with the Georgia Secretary of State in each year since forming in 2013 through present.

2.

GRA was formed without naming corporate board members. In its bylaws, it provides for the election of corporate officers, including Chairman, President, First Vice President, Second Vice President, Third Vice President, Secretary, Assistant Secretary, Treasurer, and two

National Directors, that possess and exercise the GRA Board of Directors' full authority to govern the GRA.

3.

GRA may be served according to law through its current registered agent, Timothy Nathaniel Darnell, at 5200 Dallas Highway, Ste. 200-198, Powder Springs, GA, 30127.

4.

Georgia Republican Assembly PAC, LLC ("GRA-PAC") registered with the Georgia Secretary of State as a Domestic Limited Liability Company on February 3, 2017. Its primary purpose is raising contributions for the purpose of directly and indirectly supporting specific candidates for elected office in Georgia. GRA-PAC has renewed its annual registration with the Georgia Secretary of State in each year since forming in 2017 through present.

5.

GRA-PAC consists of one member, Edwin Brant Frost, V. It may be served according to law through its current registered agent, Edwin B Frost, at 14 Greenville St, Newnan, GA 30263.

6.

The Georgia Campaign Finance Act ("the Act") defines a "connected organization" as any organization, including any business entity, which is not a political action committee but which, directly or indirectly, establishes or administers a political action committee. O.C.G.A. § 21-5-3(6). The Act further requires that the name of each political action committee shall include the name of its connected organization. O.C.G.A. § 21-5-12(a). Naming requirements ensure transparency in the political process so that voters may understand any corporate interests that are backing political action committees or other political activity.

7.

The Act defines a “political action committee” as any committee or group of persons that receives donations during the calendar year from members or supporters and which contributes funds to one or more candidates for public office or those candidates’ campaign committees. O.C.G.A. § 21-5-3(20)(A).

8.

The Act defines an “independent committee” as any committee other than a campaign committee, political party, or political action committee, which receives donations during a calendar year from persons who are members or supporters of the committee and which expends funds for the purpose of affecting the outcome of an election for any elected office or to advocate the election or defeat of any particular candidate in Georgia. O.C.G.A. § 21-5-3(15).

9.

GRA-PAC previously registered as a political action committee with the Commission on January 3, 2022. On information and belief, GRA-PAC also functioned as an independent committee, unregistered with the Commission, by virtue of having raised contributions from members or supporters and having expended funds for the purpose of affecting the outcome of elections in Georgia and for advocating the election or defeat of candidates in Georgia. Thus, the Commission retains jurisdiction over GRA-PAC both as a registered political action committee and as an unregistered independent committee.

10.

On information and belief, GRA serves as a connected organization to GRA-PAC, that is that GRA, directly or indirectly, established or administered GRA-PAC. Thus, the Commission retains jurisdiction over GRA as the connected organization to GRA-PAC.

11.

The Act requires any independent committee which accepts contributions or makes expenditures for the purpose of affecting the outcome of an election or advocates the election or defeat of any candidate **to register with the Commission prior to accepting contributions or making expenditures.** O.C.G.A. § 21-5-34(f)(1).

12.

The Commission further clarified registration and reporting requirements for entities that engage in both direct funding to candidates (political action committees) and indirect support of candidates or campaign committees (independent committees) with the issuance of Advisory Opinion 2015-02. Specifically, entities engaged in both forms of political activity must register separately as a political action committee and an independent committee and meet the disclosure filing requirements for both categories.

13.

GRA-PAC violated O.C.G.A. § 21-5-34(f)(1) by failing to register as an independent committee prior to accepting contributions or making independent expenditures for the purpose of affecting the outcome of an election. On information and belief, Respondent engaged in making independent expenditures for the purpose of affecting the outcome of elections in Georgia from August 6, 2020, through present.

14.

The Act requires independent committees to file disclosure reports on the first day of each of the two calendar months preceding any such election, two weeks prior to the date of such election, a final report prior to December 31 of the election year, and supplemental reports on June 30 and December 31 of each year that such independent committee continues to accept contributions or make expenditures O.C.G.A. § 21-5-34(f)(1)(A)-(C).

15.

On information and belief, GRA-PAC violated O.C.G.A. § 21-5-34(f)(1)(A)-(C) by failing to file the following disclosure reports:

1. GRA-PAC failed to file its September 1, 2020 disclosure report. Said report became due in advance of the November 3, 2020 general election.
2. GRA-PAC failed to file its October 1, 2020 disclosure report. Said report became due in advance of the November 3, 2020 general election.
3. GRA-PAC failed to file its October 20, 2020 disclosure report. Said report became due in advance of the November 3, 2020 general election.
4. GRA-PAC failed to file its December 31, 2020 supplemental report.
5. GRA-PAC failed to file its June 30, 2021 supplemental report.
6. GRA-PAC failed to file its October 19, 2021 disclosure report. Said report became due in advance of the November 2, 2021 general election.
7. GRA-PAC failed to file its December 31, 2021 supplemental report.
8. GRA-PAC failed to file its April 1, 2022 disclosure report. Said report became due in advance of the May 24, 2022 primary election.
9. GRA-PAC failed to file its May 10, 2022 disclosure report. Said report became due in advance of the May 24, 2022 primary election.
10. GRA-PAC failed to file its June 30, 2022 supplemental report.
11. GRA-PAC failed to file its December 31, 2022 supplemental report.

12. GRA-PAC failed to file its February 14, 2023 disclosure report. Said report became due in advance of the February 28, 2023 special general runoff election.
13. GRA-PAC failed to file its April 1, 2023 disclosure report. Said report became due in advance of the May 23, 2023 primary election.
14. GRA-PAC failed to file its May 9, 2023 disclosure report. Said report became due in advance of the May 23, 2023 primary election.
15. GRA-PAC failed to file its June 30, 2023 supplemental report.
16. GRA-PAC failed to file its December 31, 2023 supplemental report.
17. GRA-PAC failed to file its April 1, 2024 disclosure report. Said report became due in advance of the May 21, 2024 primary election.
18. GRA-PAC failed to file its May 7, 2024 disclosure report. Said report became due in advance of the May 21, 2024 primary election.
19. GRA-PAC failed to file its June 30, 2024 supplemental report.
20. GRA-PAC failed to file its December 31, 2024 supplemental report.
21. GRA-PAC failed to file its June 30, 2025 supplemental report.

16.

The Act requires reports filed by independent committees to list, as to any expenditure of more than \$100.00, the name, mailing address, occupation, and employer of the recipient and the amount, date, and general purpose thereof, including the name of the candidate or candidates, if any, on behalf of whom, or in support of or in opposition to whom, the expenditure was made.

O.C.G.A. § 21-5-34(f)(2)(B).

17.

On information and belief, Respondent violated O.C.G.A. § 21-5-34(f)(2)(B) for failing to report and itemize the following independent expenditures:

1. GRA-PAC failed to report and itemize an independent expenditure to Steadfast USA on or about August 6, 2020, in the amount of \$8,631.26.
2. GRA-PAC failed to report and itemize an independent expenditure to Mobilize the Message LLC on or about October 13, 2021, in the amount of \$10,000.00.
3. GRA-PAC failed to report and itemize an independent expenditure to Mobilize the Message, LLC on or about October 25, 2021, in the amount of \$8,800.00.
4. GRA-PAC failed to report and itemize an independent expenditure to Mobilize the Message, LLC on or about November 4, 2021, in the amount of \$3,000.00.
5. GRA-PAC failed to report and itemize an independent expenditure to Minuteman Press on or about March 31, 2022, in the amount of \$908.96.
6. GRA-PAC failed to report and itemize an independent expenditure to Mobilize the Message, LLC on or about April 15, 2022, in the amount of \$11,250.00.
7. GRA-PAC failed to report and itemize an independent expenditure to Mobilize the Message, LLC on or about April 21, 2022, in the amount of \$11,250.00.
8. GRA-PAC failed to report and itemize an independent expenditure to American Campaign Services on or about April 26, 2022, in the amount of \$9,500.00.
9. GRA-PAC failed to report and itemize an independent expenditure to Southern Pines Strategies on or about April 26, 2022, in the amount of \$5,000.00.
10. GRA-PAC failed to report and itemize an independent expenditure to American Campaign Services on or about April 27, 2022, in the amount of \$5,000.00.
11. GRA-PAC failed to report and itemize an independent expenditure to Print Source on or about April 29, 2022, in the amount of \$1,179.30.
12. GRA-PAC failed to report and itemize an independent expenditure to American Campaign Services on or about April 30, 2022, in the amount of \$5,000.00.
13. GRA-PAC failed to report and itemize an independent expenditure to American Campaign Services on or about May 5, 2022, in the amount of \$7,500.00.
14. GRA-PAC failed to report and itemize an independent expenditure to Print Source on or about May 5, 2022, in the amount of \$7,326.90.

15. GRA-PAC failed to report and itemize an independent expenditure to Print Source on May 5, 2022, in the amount of \$713.69.
16. GRA-PAC failed to report and itemize an independent expenditure to American Campaign Services on or about May 9, 2022, in the amount of \$12,000.00.
17. GRA-PAC failed to report and itemize an independent expenditure to American Campaign Services on or about May 10, 2022, in the amount of \$12,000.00.
18. GRA-PAC failed to report and itemize an independent expenditure to American Campaign Services on or about May 11, 2022, in the amount of \$1,500.00.
19. GRA-PAC failed to report and itemize an independent expenditure to Print Source on or about May 11, 2022, in the amount of \$13,639.10.
20. GRA-PAC failed to report and itemize an independent expenditure to American Campaign Services on or about May 16, 2022, in the amount of \$2,400.00.
21. GRA-PAC failed to report and itemize an independent expenditure to Mobilize the Message, LLC on or about May 31, 2022, in the amount of \$9,000.00.
22. GRA-PAC failed to report and itemize an independent expenditure to The Stoneridge Group on or about June 8, 2022, in the amount of \$5,000.00.
23. GRA-PAC failed to report and itemize an independent expenditure to Print Source on or about June 9, 2022, in the amount of \$5,579.75.
24. GRA-PAC failed to report and itemize an independent expenditure to Print Source on or about June 22, 2022, in the amount of \$159.16.
25. GRA-PAC failed to report and itemize an independent expenditure to The Stoneridge Group on or about June 22, 2022, in the amount of \$5,000.00.
26. GRA-PAC failed to report and itemize an independent expenditure to Print Source on or about January 10, 2023, in the amount of \$5,159.81.
27. GRA-PAC failed to report and itemize an independent expenditure to Print Source on or about January 13, 2023, in the amount of \$2,708.38.
28. GRA-PAC failed to report and itemize an independent expenditure to Print Source on or about January 16, 2023, in the amount of \$2,708.38.

29. GRA-PAC failed to report and itemize an independent expenditure to Minuteman Press – Newnan on or about February 1, 2023, in the amount of \$192.54.
30. GRA-PAC failed to report and itemize an independent expenditure to Minuteman Press – Newnan on or about February 3, 2023, in the amount of \$96.43.
31. GRA-PAC failed to report and itemize an independent expenditure to Hazlitt Industries, LLC on or about February 7, 2023, in the amount of \$5,000.00.
32. GRA-PAC failed to report and itemize an independent expenditure to Print Source on or about February 7, 2023, in the amount of \$2,758.43.
33. GRA-PAC failed to report and itemize an independent expenditure to Hazlitt Industries, LLC on or about February 13, 2023, in the amount of \$10,000.00.
34. GRA-PAC failed to report and itemize an independent expenditure to Minuteman Press – Newnan on or about February 13, 2023, in the amount of \$666.44.
35. GRA-PAC failed to report and itemize an independent expenditure to Print Source on or about February 16, 2023, in the amount of \$2,758.47.
36. GRA-PAC failed to report and itemize an independent expenditure to Minuteman Press – Newnan on or about February 20, 2023, in the amount of \$1,300.42.
37. GRA-PAC failed to report and itemize an independent expenditure to Hazlitt Industries, LLC on or about February 28, 2023, in the amount of \$15,000.00.
38. GRA-PAC failed to report and itemize an independent expenditure to Minuteman Press on or about March 9, 2023, in the amount of \$1,502.69.
39. GRA-PAC failed to report and itemize an independent expenditure to Landmark Communications, Inc. on or about March 6, 2024, in the amount of \$4,146.00.
40. GRA-PAC failed to report and itemize an independent expenditure to Minuteman Press – Newnan on or about May 7, 2024, in the amount of \$4,690.98.

See Exhibit 2.

WHEREFORE, Commission staff pray as follows:

- a) That process issue and Respondents be served with a copy of this Complaint.
- b) That, in the event that a violation of the Act is substantiated, Respondents be appropriately sanctioned by the Commission in accordance with O.C.G.A. § 21-5-6(14).
- c) That GRA-PAC register as an Independent Committee and complete all missed disclosure reports as alleged in this complaint.

Respectfully submitted, this is the 1st day of October, 2025.

State Ethics Commission



Timothy Baywal
Staff Attorney
Georgia State Bar No.: 460743

200 Piedmont Ave, SE
Suite 1416 – West Tower
Atlanta, GA 30334
(470) 355-6000
(404) 463-1988 facsimile

**BEFORE THE STATE ETHICS COMMISSION
STATE OF GEORGIA**

IN THE MATTER OF:

*

CASE NO.: 25-0060-C

*

**GEORGIA REPUBLICAN
ASSEMBLY, INC.**

*

*

*

AND

*

*

**GEORGIA REPUBLICAN
ASSEMBLY PAC, LLC.**

*

*

CERTIFICATE OF SERVICE

This will certify that I have, this day, delivered and served a true and exact copy of the foregoing Complaint upon the following by placing a true and exact copy of same in the United States mail with adequate postage affixed thereto and addressed as follows:

Georgia Republican Assembly PAC, LLC
C/O Anthony Sabatini
Attorney for GRA-PAC
1601 E. 1st Ave.
Mount Dora, FL 32757

And

Georgia Republican Assembly, Inc.
C/O Timothy Nathaniel Darnell
5200 Dallas Highway, Ste. 200-198
Powder Springs, GA 30127

This 1st day of October, 2025.



Timothy Baywal
Georgia State Bar No.: 460743
Georgia State Ethics Commission