

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

IN THE MATTER OF:

**GEORGIA REPUBLICAN
ASSEMBLY (GRA) PAC**

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CASE NO.: 25-0060-C

COMPLAINT

COMES NOW, the Georgia Ethics Commission (hereinafter "Commission") and files this Complaint against the Georgia Republican Assembly (GRA) PAC (hereinafter "Respondent") and asserts the following:

1.

Respondent organized as a domestic limited liability company with the Georgia Secretary of State on February 3, 2017. The entity was organized by Edwin Brant Frost, V. See Exhibit 1.

2.

Respondent can be served according to law by way of its registered agent Edwin B Frost, 14 Greenville St, Newnan, GA 30263.

3.

The Campaign Finance Act ("the Act") defines a political action committee as "any committee...which receives donations during a calendar year from persons who are members or supporters of the committee and which contributes funds to one or more candidates [or campaign committees for candidates] for public office." O.C.G.A. § 21-5-3(20)(A).

4.

The Act further 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 either for the purpose of affecting the outcome of an election or to advocate the election or defeat of any particular candidate.” O.C.G.A. § 21-5-3(15).

5.

Respondent previously registered as a political action committee with the Commission on January 3, 2022, and has annually renewed this registration through present.

6.

Respondent has never registered as an independent committee with the Commission.

7.

The Commission retains jurisdiction over Respondent both as an entity that raises funds for the purpose of making contributions directly to candidates or campaign committees and as an entity that raises funds, independent of candidates or campaign committees, and expends those funds advocating for the election or defeat of particular candidates for office in Georgia.

8.

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).

9.

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. The entity must register both as a political action committee and an independent committee and meet the disclosure filing requirements for both categories.

10.

Respondent 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 between the period of October 11, 2021 through March 6, 2024.

11.

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).

12.

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

1. Respondent failed to file its October 19, 2021 disclosure report.

2. Respondent failed to file its December 31, 2021 disclosure report.
3. Respondent failed to file its March 1, 2022 disclosure report.
4. Respondent failed to file its April 1, 2022 disclosure report.
5. Respondent failed to file its May 10, 2022 disclosure report.
6. Respondent failed to file its June 30, 2022 disclosure report.
7. Respondent failed to file its September 1, 2022 disclosure report.
8. Respondent failed to file its October 1, 2022 disclosure report.
9. Respondent failed to file its October 25, 2022 disclosure report.
10. Respondent failed to file its December 31, 2022 disclosure report.
11. Respondent failed to file its March 1, 2023 disclosure report.
12. Respondent failed to file its April 1, 2023 disclosure report.
13. Respondent failed to file its May 9, 2023 disclosure report.
14. Respondent failed to file its June 30, 2023 disclosure report.
15. Respondent failed to file its September 1, 2023 disclosure report.
16. Respondent failed to file its October 1, 2023 disclosure report.
17. Respondent failed to file its October 24, 2023 disclosure report.
18. Respondent failed to file its December 31, 2023 disclosure report.
19. Respondent failed to file its March 1, 2024 disclosure report.
20. Respondent failed to file its April 1, 2024 disclosure report.
21. Respondent failed to file its May 21, 2024 disclosure report.
22. Respondent failed to file its June 30, 2024 disclosure report.
23. Respondent failed to file its December 31, 2024 disclosure report.
24. Respondent failed to file its June 30, 2025 disclosure report.

13.

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).

14.

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. Respondent failed to report and itemize an independent expenditure to Minuteman Press on or about October 11, 2021, in the amount of \$437.82.
2. Respondent failed to report and itemize an independent expenditure to The Print Source on or about October 13, 2021, in the amount of \$1,880.01.
3. Respondent failed to report and itemize an independent expenditure to The Print Source on or about October 14, 2021, in the amount of \$131.60.
4. Respondent failed to report and itemize an independent expenditure to CallHub on or about November 1, 2021, in the amount of \$500.00.
5. Respondent failed to report and itemize an independent expenditure to Mobilize the Message, LLC on or about November 4, 2021, in the amount of \$21,800.00.
6. Respondent failed to report and itemize an independent expenditure to Minuteman Press on or about March 31, 2022, in the amount of \$908.96.
7. Respondent 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.
8. Respondent failed to report and itemize an independent expenditure to Minuteman Press on or about April 21, 2022, in the amount of \$11,250.00.
9. Respondent 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.
10. Respondent 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.
11. Respondent 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.

12. Respondent failed to report and itemize an independent expenditure to The Print Source on or about April 29, 2022, in the amount of \$1,179.30.
13. Respondent 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.
14. Respondent failed to report and itemize an independent expenditure to Minuteman Press on or about May 6, 2022, in the amount of \$353.30.
15. Respondent failed to report and itemize an independent expenditure to CallHub on or about May 10, 2022, in the amount of \$350.00.
16. Respondent failed to report and itemize an independent expenditure to The Print Source on or about May 11, 2022, in the amount of \$21,679.69.
17. Respondent failed to report and itemize an independent expenditure to American Campaign Services on or about May 16, 2022, in the amount of \$35,400.00.
18. Respondent failed to report and itemize an independent expenditure to RumbleUp on or about May 24, 2022, in the amount of \$5,098.00.
19. Respondent 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.
20. Respondent failed to report and itemize an independent expenditure to RumbleUp on or about June 21, 2022, in the amount of \$1,377.00.
21. Respondent failed to report and itemize an independent expenditure to The Print Source on or about June 22, 2022, in the amount of \$5,738.91.
22. Respondent failed to report and itemize an independent expenditure to The Stoneridge Group on or about June 22, 2022, in the amount of \$10,000.00.
23. Respondent failed to report and itemize an independent expenditure to RumbleUp on or about November 9, 2022, in the amount of \$421.32.
24. Respondent failed to report and itemize an independent expenditure to Imperial Independent Media, LLC on or about January 9, 2023, in the amount of \$2,940.00.
25. Respondent failed to report and itemize an independent expenditure to The Print Source on or about January 10, 2023, in the amount of \$5,159.81.

26. Respondent failed to report and itemize an independent expenditure to RumbleUp on or about January 11, 2023, in the amount of \$581.00.
27. Respondent failed to report and itemize an independent expenditure to The Print Source on or about January 13, 2023, in the amount of \$2,708.38.
28. Respondent failed to report and itemize an independent expenditure to The Print Source on or about January 16, 2023, in the amount of \$2,708.38.
29. Respondent failed to report and itemize an independent expenditure to RumbleUp on or about January 17, 2023, in the amount of \$583.00.
30. Respondent 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.
31. Respondent 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.
32. Respondent failed to report and itemize an independent expenditure to The Print Source on or about February 16, 2023, in the amount of \$5,516.90.
33. Respondent 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.
34. Respondent failed to report and itemize an independent expenditure to Minuteman Press on or about March 9, 2023, in the amount of \$3,758.52.
35. Respondent failed to report and itemize an independent expenditure to RumbleUp on or about June 30, 2023, in the amount of \$895.00.
36. Respondent failed to report and itemize an independent expenditure to Landmark Communications on or about March 6, 2024, in the amount of \$5,000.00.

See Exhibit 2.

WHEREFORE, Commission staff pray as follows:

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

Respectfully submitted, this is the 30th day of July, 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

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STATE OF GEORGIA**

IN THE MATTER OF:

**GEORGIA REPUBLICAN
ASSEMBLY (GRA) PAC**

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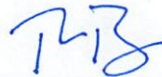
CASE NO.: 25-0060-C

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:

Edwin B Frost
Georgia Republican Assembly (GRA) PAC
14 Greenville St
Newnan, GA 30263

This 30th day of July, 2025.



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

EXHIBIT 1

GEORGIA SECRETARY OF STATE FILINGS

STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

CERTIFICATE OF ORGANIZATION

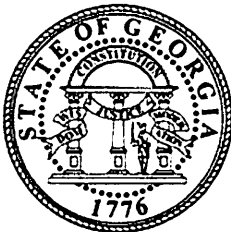
I, Brian P. Kemp, the Secretary of State and the Corporation Commissioner of the State of Georgia, hereby certify under the seal of my office that

Georgia Republican Assembly PAC, LLC

a Domestic Limited Liability Company

has been duly organized under the laws of the State of Georgia on **02/03/2017** by the filing of articles of organization in the Office of the Secretary of State and by the paying of fees as provided by Title 14 of the Official Code of Georgia Annotated.

WITNESS my hand and official seal in the City of Atlanta
and the State of Georgia on 03/07/2017



Brian P. Kemp
Secretary of State

ARTICLES OF ORGANIZATION

Electronically Filed

Secretary of State

Filing Date: 2/2/2017 11:56:51 AM

BUSINESS INFORMATION

| | |
|----------------|--------------------------------------|
| CONTROL NUMBER | 17025151 |
| BUSINESS NAME | Georgia Republican Assembly PAC, LLC |
| BUSINESS TYPE | Domestic Limited Liability Company |
| EFFECTIVE DATE | 02/03/2017 |

PRINCIPAL OFFICE ADDRESS

| | |
|---------|--|
| ADDRESS | 14 Greenville St, Newnan, GA, 30263, USA |
|---------|--|

REGISTERED AGENT'S NAME AND ADDRESS

| | |
|----------------|---|
| NAME | ADDRESS |
| Jason Shepherd | 1468 Benjamin Ct SW, Cobb, Marietta, GA, 30064, USA |

ORGANIZER(S)

| | | |
|----------------------|-----------|--|
| NAME | TITLE | ADDRESS |
| Edwin Brant Frost, V | ORGANIZER | 14 Greenville Street, Newnan, GA, 30263, USA |

OPTIONAL PROVISIONS

N/A

AUTHORIZER INFORMATION

| | |
|----------------------|----------------------|
| AUTHORIZER SIGNATURE | Edwin Brant Frost, V |
| AUTHORIZER TITLE | Organizer |

STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

Annual Registration

Electronically Filed

Secretary of State

Filing Date: 01/19/2023 14:56:15

BUSINESS INFORMATION

BUSINESS NAME : Georgia Republican Assembly PAC, LLC
CONTROL NUMBER : 17025151
BUSINESS TYPE : Domestic Limited Liability Company
ANNUAL REGISTRATION PERIOD : 2023, 2024, 2025

BUSINESS INFORMATION CURRENTLY ON FILE

PRINCIPAL OFFICE ADDRESS : 14 Greenville St, Newnan, GA, 30263, USA
REGISTERED AGENT NAME : Jason Shepherd
REGISTERED OFFICE ADDRESS : 1468 Benjamin Ct SW, Marietta, GA, 30064, USA
REGISTERED OFFICE COUNTY : Cobb

UPDATES TO ABOVE BUSINESS INFORMATION

PRINCIPAL OFFICE ADDRESS : 14 Greenville St, Newnan, GA, 30263-3026, USA
REGISTERED AGENT NAME : Edwin B Frost
REGISTERED OFFICE ADDRESS : 14 Greenville St, Newnan, GA, 30263-3026, USA
REGISTERED OFFICE COUNTY : Coweta

AUTHORIZER INFORMATION

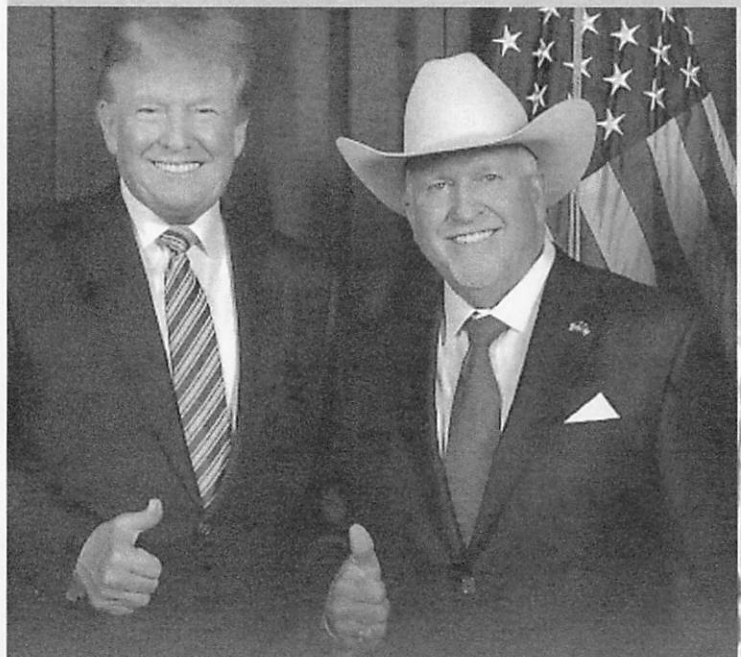
AUTHORIZER SIGNATURE : Edwin Frost
AUTHORIZER TITLE : Registered Agent

EXHIBIT 2

SAMPLE INDEPENDENT EXPENDITURES

GENE KING FOR COUNTY COMMISSIONER - DISTRICT 1

BUSINESSMAN - AMERICA FIRST FIGHTER - COMMUNITY LEADER



I ask for your vote to be your next county commissioner

Remember

GENE KING

County Commissioner - District 1!

PAID FOR BY GRA-PAC

I am Gene King, your America First Republican candidate for County Commissioner.

We, as a community of like minds, can work together to make our District the best area in the county to reside, work, and attend church and school while enjoying our families and friends. In the many years, I've lived in Meriwether, I have seen many changes. I have served as a community leader and worked to bring development and good jobs to our county and I would like to continue that service and aid in leading our county to an even better place.

I am concerned about our roads, our commutes to and from work, and of course..our taxes. Together, we can manage our growth and preserve our county's quality of life that we all love. As a businessman, I will bring a businessman's instinct for getting the best bang for the taxpayers' buck.

With your help, we can make the next 4 years successful for all our people. I promise to be the voice for you and to act according to what you want and need.

Your vote will give us the opportunity to make that happen.

Early Voting begins on May 2nd
at

**137 S Court Square,
Greenville, GA 30222**

Election Day is May 24

FusionPro

FIGHT FAKE NEWS

PROTECT THE CHILDREN



COWETA TRUE CONSERVATIVES
FOR BOARD OF EDUCATION

★★★★ **BRITTON** ★★★★★
GAMBARDELLA
MENK ★★★★★ **SMITH**



VOTE **MAY 24**

EARLY VOTING ENDS MAY 20

PAID FOR BY GRA PAC



DRAIN THE SWAMP

LOWER SCHOOL TAX, STOP CRT



#BGMS

BRITTON-GAMBARDELLA-MENK-SMITH

PAID FOR BY GRA PAC

VOTE **MAY 24**



ELECT TRUE CONSERVATIVES FOR COWETA BOE
BRITTON-GAMBARDELLA-MENK-SMITH

VOTE
MAY 24

PAID FOR BY GRA PAC



*CHARLICE WAS ONE OF PRESIDENT TRUMP'S
EARLIEST SUPPORTERS AND HAS STOOD BY HIM EVER SINCE.*

ENDORSED BY THE GRA!

Learn more at www.GeorgiaRA.com



**THE GEORGIA REPUBLICAN ASSEMBLY PAC (GRA-PAC) IS
PROUD TO SUPPORT CHARLICE FOR HER FANTASTIC VOTING RECORD,
COURAGE AND COMMITMENT TO WALKING THE WALK,
NOT JUST TALKING THE TALK IN THE HALLS OF GOVERNMENT.**

**CHARLICE IS TOUGH AS NAILS WITH A BACKBONE
OF IRON WHO TELLS IT LIKE IT IS.**

**RE-ELECT
REPRESENTATIVE
CHARLICE BYRD**

Early Voting begins on May 2

Early Voting Locations

65 Literary Lane, Newnan GA 30265 | 22 East Broad Street, Newnan GA 30263

A Conservative Platform for Coweta Schools

Stop Critical Race Theory (CRT)
Remove Obscene Age-Inappropriate
materials from school media centers
Pro-School Choice and Pro-Parents Rights
Pro-Abstinence Sex Education
Pro-Tax Cuts / Senior Tax Exemptions
Pro-Traditional Morals Values

Cory Gambardella
At-Large



Linda Menk
District 4



Election Day is May 24!

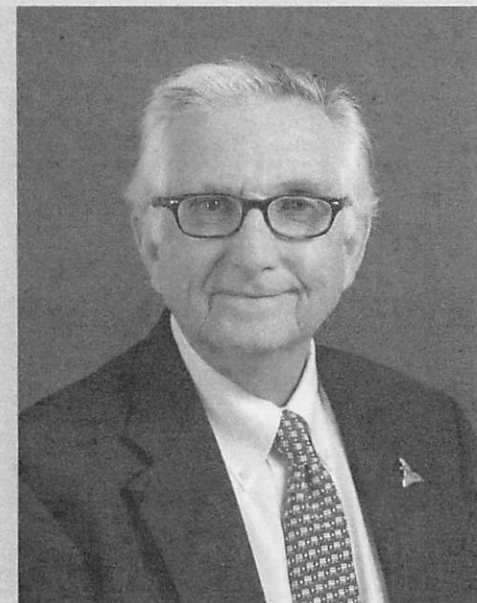
PAID FOR BY GRA-PAC

DON'T LET DALE WASHBURN GET AWAY WITH A VOTING RECORD LIKE THIS

VOTE HIM OUT ON MAY 24TH

Representative Dale Washburn supports legislation - HB 932 that would have allowed refugees, some Afghan migrants, and immigrants with a special visa to access the much lower in-state tuition rate in our taxpayer-funded public colleges as soon as they migrated to Georgia. Americans who moved here from other states would still have been required to wait a year to qualify for the lower in-state rate.

Washburn joined Democrats in effusively expressing his admiration for the legislation during a committee hearing with *"uh, thank you, Mr. Chairman. I wanna make the praise for this bill bipartisan. Uh, uh, thank you for bringing it. It's an excellent bill, and certainly, in my mind, it is the right thing to do for these people. And the added benefit is, is not only the right thing, it's a good thing for Georgia and it makes sense in many ways.....Yeah. Well, it's an excellent bill, and uh, I hope we get a chance to vote yes on it, uh, soon"* added Washburn.



TAKE ACTION

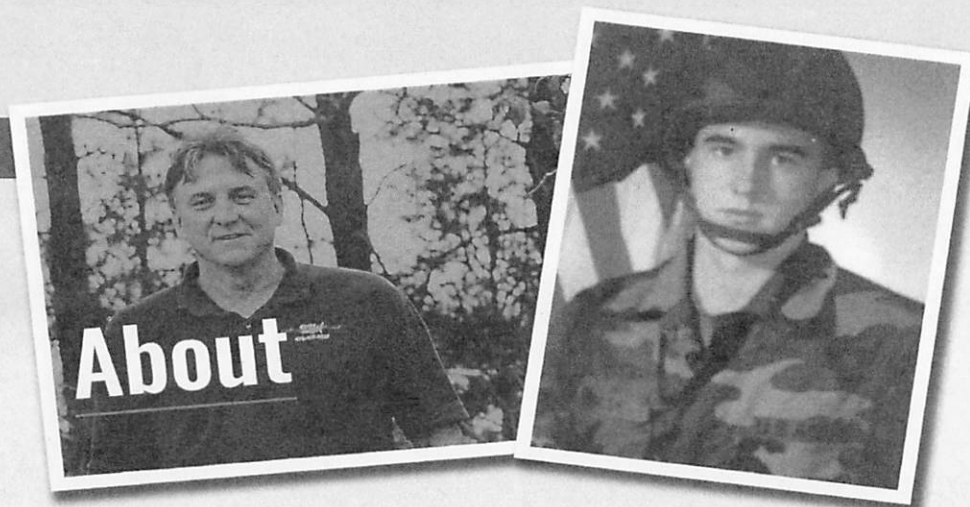
EARLY VOTING BEGINS ON
MAY 2

ELECTION DAY IS MAY 24

PAID FOR BY GRA-PAC - GEORGIA'S #1 GRASSROOTS
CONSERVATIVE PAC - READ MORE AND FIND ALL THE
LINKS AND SOURCES AT GRAPAC.ORG/AMNESTY

PRST STD
POSTAGE
PAID
PERMIT 27
NEWNAN GA

VOTE FOR
CONSERVATIVE FIGHTER
CHARLIE CHASE
JAN. 31ST



VALUES

PRO SECOND AMEUREMENT

PROTECT LOCAL ECONOMY

PROTECTING STUDENTS

SUPPORT LAW & ORDER

Learn more at
GRAPAC.org/Chase

PRST STD
POSTAGE
PAID
PERMIT 27
NEWNAN GA

PAID FOR BY GRA-PAC - GRAPAC.ORG

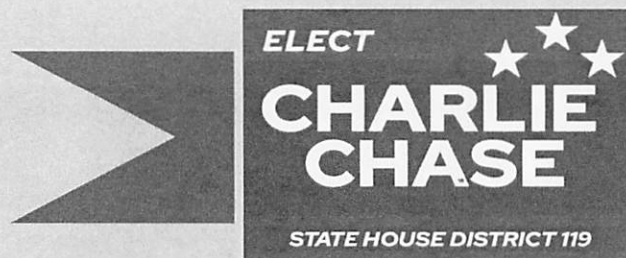
Charlie Chase
Endorsed by the GRA



*Don't trade one corrupt Republican
for another. Vote for an honest
Conservative this **January 31st.***

Meet Charlie Chase:

- ✓ Business Owner
- ✓ Veteran
- ✓ Conservative
- ✓ Real Republican
- ✓ Honest



**VOTE FOR CONSERVATIVE
FIGHTER, CHARLIE CHASE**

GRAPAC.ORG/CHASE

VOTE FOR OUR AMERICA FIRST FIGHTER - REPRESENTATIVE SHERI GILLIGAN

A PROVEN CONSERVATIVE TRACK RECORD

FOUNDING MEMBER OF THE GEORGIA FREEDOM CAUCUS



**RE-ELECT
REPRESENTATIVE
SHERI GILLIGAN**

Other politicians talk the talk - Sheri walks the walk.
Sheri has authored, supported and voted for legislation to...

***Pass Constitutional Carry to Restore
Your Second Amendment Rights.
Protect the Right to Life of Preborn Babies.
Securing our Elections.
Banning CRT in Georgia.***



NRA



**Early Voting begins on May 2
Election Day is May 24**

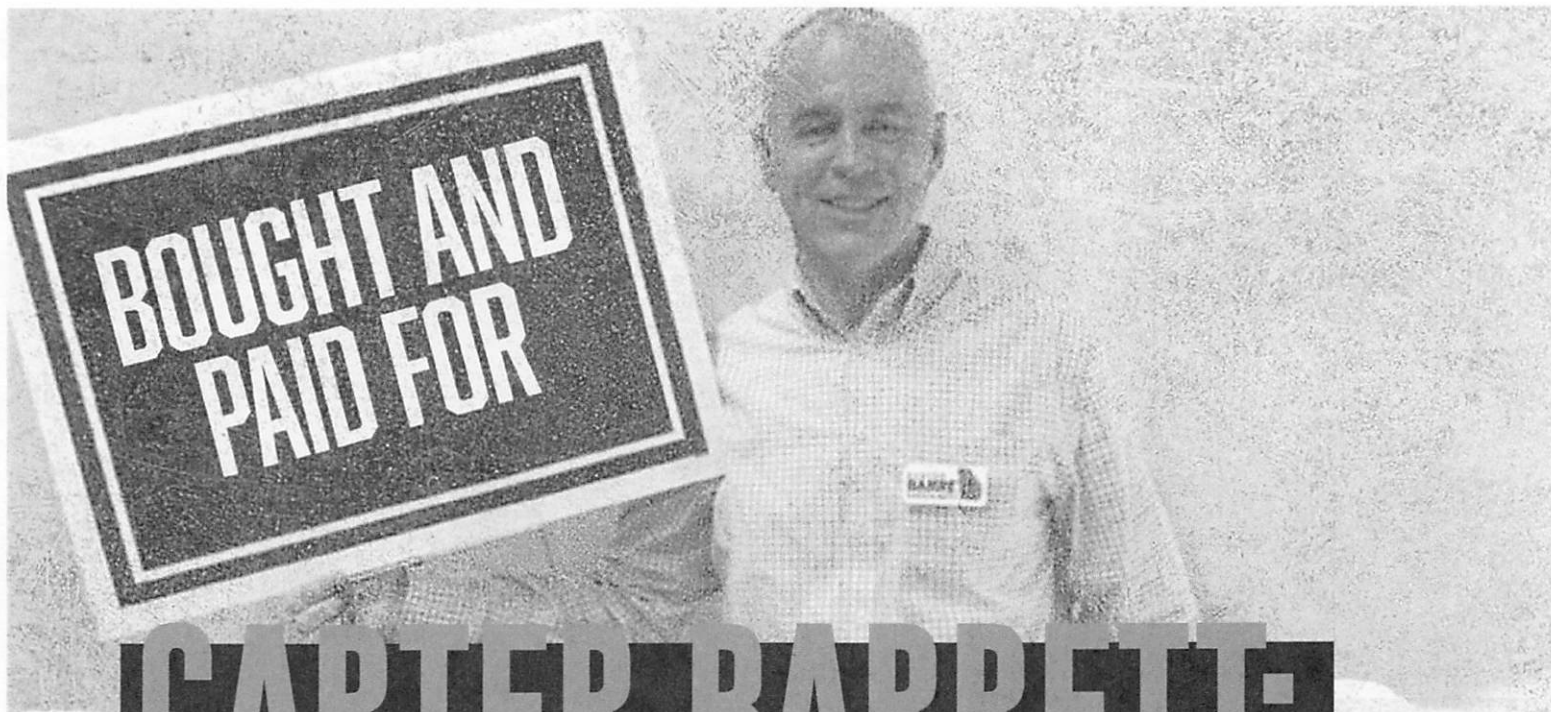
Paid for by GRA-PAC - Georgia's #1 Grassroots Conservative PAC - Learn more at GRAPAC.org/gilligan



**NO ONE HAS
DONE MORE FOR
FORSYTH THAN
SHERI
GILLIGAN**

- ✓ **Cracked Down on Crime and Gangs**
- ✓ **Opposed Reckless Overdevelopment**
- ✓ **Fought Biden's Cost of Living Increases by Cutting Taxes**
- ✓ **Resecured Election Integrity**

Re-elect Conservative **SHERI GILLIGAN** on June 21st



CARTER BARRETT: BEHOLDEN TO BIG DEVELOPERS, NOT US

Carter Barrett is no Forsyth County Conservative. Rather than fighting for our families, he's pocketed thousands from Big Developers.

And if Carter and those bankrolling his campaign get their way, that could lead to the destruction of our quality of life.

BARRETT'S BOONDOGGLE

X Drastic Overcrowding in Schools

X Clogged Roads and More Time in Traffic

X More High Density Development

X Fighting for Big Developers, Not Us

VOTE NO ON CARTER BARRETT ON JUNE 21ST