

# Georgia Government Transparency and Campaign Finance Commission

200 Piedmont Avenue | Suite 1402, West Tower | Atlanta, Georgia 30334 | 404-463-1980 | www.ethics.ga.gov

RECEIVED

Campaign Finance Commission

OCT 02 2013

## COMPLAINT FORM

Alleging a Violation of the Georgia Government Transparency and Campaign Finance Act

Post Mark Date SEP 30 2013

**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 original signed/notarized form and attachments to above address.

### I. PERSON BRINGING COMPLAINT = COMPLAINANT:

Name: R. George Anderson  
 Address: 211 Saddle Mountain Road S.E.  
 City: Rome State: GA County: Floyd Zip: 30161  
 Telephone: 706-290-4499 E-mail (optional): rmanderson358@comcast.net

### II. PARTY AGAINST WHOM COMPLAINT IS BROUGHT = RESPONDENT:

Name: REAL PAC INC.  
 Address: 303 Peachtree Street NE  
 City: ROSWELL State: GA County: Zip: 30308  
 Telephone: 404-527-4000  
 Title of office held or sought: (if applicable)

### 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.

527 Group organized to raise money for political activities. The FEC requires the PAC to file regular disclosure reports. The 527 REAL PAC Inc. must file with the state government. PACs may receive up to \$5,000 from individuals. The PAC is supposed to be independent of the politician. This is not true involving "REAL PAC Inc. A peak at its website presents the viewer with a picture of Governor Deal. Governor Deal hired the treasurer of "REAL PAC", Rick Thompson. "REAL PAC Inc. created by Deal's law firm, McKenna Wong. The Chairman is Jim Walter, friend & large contributor to Governor Deal. Ken Crowan is an officer of "REAL PAC" & business partner.

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

STATE OF Georgia COUNTY OF Floyd

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.

Notary Stamp/Crimp: Sworn to and subscribed before me on September 27, 2013  
[Signature]  
 Signature of Notary Public  
 My Commission Expires: April 18, 2016

SIGNATURE OF COMPLAINANT: [Signature]  
 DATE: 9-27-2013

**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.

Crowan is business partner to Governor Nathan Deal.

**GEORGE ANDERSON**  
**211 SADDLE MOUNTAIN ROAD S.E.**  
**ROME, GEORGIA 30161**  
**706-290-4499**  
**manderson358@comcast.net**

**September 27, 2013**

**Georgia Government Transparency and Campaign Finance Commission**  
**200 Piedmont Avenue**  
**Suite 1402, West Tower**  
**Atlanta, Georgia 30334**  
**404-463-1980**  
**www.ethics.ga.gov**

**Subject: Formal Complaint against> REAL PAC Inc.**

**Realpacga.com**  
**303 Peachtree Street, Suite 5300**  
**Atlanta, GA 30308**

**Board Members of the 527 PAC {political organization}**

- A. Jim Walter...Chairman**
- B. Ken Cronan...Secretary**
- C. Rick Thompson...Treasurer**
- D. Russell P. Love...Attorney at McKenna Long Aldridge, as well as, Registered Agent/Incorporator**
- E. "The Man behind the curtain" ...Governor Nathan Deal...Welcomes all on the realpacga.com website.**

**REAL PAC Inc. was created 5/16/2011**

**Purposes: The Corporation is organized exclusively as a "political organization" within the meaning of Section 527 of the Internal Revenue Code of 1986, and will conduct and carry on the work of the**

Corporation exclusively as a "political organization" in a manner consistent with Section 527 of the Code and the Treasury Regulations promulgated thereunder.

Limitations: The Corporation shall not carry on any activity (ies) not permitted to be carried on by "political organizations" under Section 527 of the Code and the Treasury Regulations promulgated thereunder. INTENT: It is intended that the Corporation shall have, and continue to have, the status of a "political organization" as defined in Section 527 of the Code. The 527 PAC cannot have connections to any candidate.

Chairman Jim Walters is a longtime friend of Governor Deal.

Secretary Ken Cronan is a longtime business partner of Nathan Deal.

Treasurer Rick Thompson is a hired consultant to the Nathan Deal Gubernatorial campaign.

Registered Agent/Incorporator Russell P. Love is a partner at McKenna Long & Aldridge...rlove@mckennalong.com

REAL PAC Inc. has expended over \$46,000.00 to Denise Deal/Southern Magnolia Capital on the following dates:

- A. 12/19/2011
- B. 01/18/2012
- C. 07/17/2012
- D. 07/17/2012

REAL PAC Inc. has expended \$4,200.00 to McKenna Long for "legal services".

REAL PAC Inc. has paid out \$10,000.00 to the Georgia Republican Party.

REAL PAC Inc. paid out \$10,355.00 to Secretary/pilot...for plane expenses.

REAL PAC Inc. has received the following contributions:

1. \$50,000.00 from WellCare of Georgia Inc. {on the same exact day State of Georgia officials decided to extend the contract for WellCare...a two year contract totaling \$2 billion dollars.
2. \$25,000.00 from AT & T.
3. \$50,000.00 from Majestic Realty Company.

4. \$50,000.00 from Georgia Crown Distributing Co. {Governor re-appointed Leebern to the State of Georgia Board of Regents}.
5. \$50,000.00 from United Healthcare {State of Georgia provider of State insurance benefits}.
6. Additional \$50,000.00 from WellCare of Georgia, Inc. {is in the process of gaining the State of Georgia contract from United Healthcare}.
7. \$25,000.00 from Blue Cross Blue Shield of Georgia {also seeking State of Georgia contract on state healthcare benefits}.
8. \$25,000.00 from Cypress Health Group LLC, NY.
9. \$100,000.00 from United Health Services of GA PAC Inc., The Oaks Of Cordele, UPS of Tocca, Inc., United Hospice of Cordele, and United Medical LLC. All listed with the same address and paid out to REAL PAC Inc. on the same date, as well as, each paying \$20,000.00 a piece.
10. REAL PAC Inc. pays out \$50,000.00 to ZTP, LLC in Gainesville, Georgia.
11. REAL PAC Inc. pays out approximately \$26,602.00 to Rick Thompson...former State of Georgia Executive Secretary of the State Ethics Commission. His company is listed as R. Thompson & Associates at 40 Tower Park Place, Roswell, Georgia. REAL PAC Inc. reveals its address as P.O. Box 1386, Roswell, Georgia 30077.
12. The Nathan Deal campaign pays over \$81,000.00 to Rick Thompson in campaign years 2011, 2012, & 2013.
13. REAL PAC Inc. pays out over \$32,000.00 to Southern Magnolia Capital in 2011 & 2012.

**REAL PAC Inc.**

Secretary/Ken Cronan	Treasurer/Rick Thompson
Incorporator/Registered Agent	Chairman/Jim Walters
Russell P. Love/McKenna Long	Southern Magnolia Capital/Denise Deal

The REAL PAC Inc. has violated the 527 Committee Rules regarding candidates being involved in setting up a 527 Political Action Committee.

REAL PAC Inc. is connected to Governor Deal. His family and business partner have been receiving payments from REAL PAC Inc. REAL PAC Inc. has paid large sums to Chief of Staff Chris Riley, as well as, to Deal Campaign consultant, Rick Thompson. Deal's campaign slogan in the 2010 Governor's race was 'Deal Real'. McKenna Long incorporated REAL PAC Inc. Randy Evans and Kenneth Vinson represents Governor Deal, as well as, having a McKenna Long attorney working in the Governor's Executive Offices. REAL PAC Inc. has paid out thousands to Denise Deal; the Governor's daughter-in-law, as well as, to the Governor's business partner, Ken Cronan. Cronan received more than \$10,000.00 in December for pilot and plane expenses from REAL PAC Inc. REAL PAC Inc. has paid out funds to the Governor's Mansion.

public must have reasonable access to the disclosure of the significant private interests of the public officers of this state.”

O.C.G.A. 21-5-12 has been violated by the Governor and his associates. O.C.G.A. 21-5-40 (1) has been violated by REAL PAC Inc.

Wherefore the Complainant does request an investigation, a Preliminary Hearing, as well as, a Full Administrative Hearing regarding the above-said matter.

Complainant

A handwritten signature in cursive script that reads "George Anderson". The signature is written in black ink and is positioned to the right of the printed name.

George Anderson



Mr. George Anderson  
211 Saddle Mountain Rd. SE  
Rome, GA 30161

**CERTIFIED MAIL™**

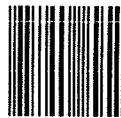


7005 2570 0000 2913 3644



UNITED STATES  
POSTAL SERVICE

1000



30334

U.S. POSTAGE  
PAID  
SILVER CREEK, GA  
30173  
SEP 30, 13  
AMOUNT

**\$7.37**

00051531-02

Georgia Government Transparency and  
Campaign Finance Commission  
200 Piedmont Ave.  
Suite 1402, West Tower  
Atlanta, Georgia 30334

**RETURN RECEIPT  
REQUESTED**

**RETURN RECEIPT  
REQUESTED**

