

ARKANSAS ETHICS COMMISSION
910 WEST SECOND STREET, SUITE 100
LITTLE ROCK, AR 72201
Phone (501) 324-9600 Toll Free (800) 422-7773

CITIZEN COMPLAINT FORM

The undersigned person files this complaint and requests that the Arkansas Ethics Commission conduct an investigation concerning the facts and actions detailed below for the purpose of determining whether or not there has been a violation of laws under the Commission's jurisdiction.

1. Identify the person you are complaining about:

Name: REBUILD THE ROCK Position or Title: _____

Address: PO Box 7824 Phone: (Home) _____

LITTLE ROCK, AR 72217 (Work) 501-680-5286

2. State in your own words the *detailed* facts and the actions of the person named in section 1 which prompted you to make this complaint. The brief space provided below is not intended to limit your statement of facts. Please use the back of this form or additional sheets if necessary. Include relevant dates, times, and the names, and addresses of other persons whom you believe have knowledge of the facts.

PLEASE SEE APPENDIX A, ATTACHED HERETO

3. Attach or make reference to any documents, materials, minutes, resolutions or other evidence which support your allegations.

State of Arkansas
County of Pulaski

I swear or affirm, under penalty of perjury, that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief.

Subscribed and sworn before me this
15 day of September, 2021.

Signature: [Signature]

Print your name: MATTHEW CAMPBELL

Notary Signature: [Signature]

Mailing address: 104 WINNWOOD RD
LITTLE ROCK, AR 72207

My Commission Expires: 5/29/23

Phone: (Home) _____ (Work) 501-396-9246



Appendix A

Specific Allegations of Reporting Violations

The “Rebuild the Rock” committee (hereinafter “RTR”) is a legislative question committee (“LCQ”) as that is defined in Arkansas Code Annotated § 7-9-402(10)(A). As an LCQ, RTR is required to file certain financial disclosure reports which contain the information mandated by Arkansas Code Annotated § 7-9-407. As is relevant to this complaint, section 7-9-407 requires, *inter alia*, the following information:

- The name and street address of each person who contributed fifty dollars or more during the period covered by the financial report, together with the amount contributed, the date of receipt, and the cumulative amount contributed by that person for each ballot question or legislative question (Ark. Code Ann. § 7-9-407(2)(A)(vii));

- For each person listed under subdivision (2)(A)(vii) of this section, the contributor’s principal place of business, employer, occupation, the amount contributed, the date the contribution was accepted by the committee, and the cumulative amount contributed for each ballot question or legislative question (Ark. Code Ann. § 7-9-407(2)(A)(viii)); and

- The name and street address of each person to whom expenditures totaling one hundred dollars (\$100) or more were made by the committee, individual person, or elected official using public funds, or on behalf of the committee, individual person, or elected official using public funds, by an advertising agency, public relations firm, or political consultant, together with the date and amount of each separate expenditure to each person during the period covered by the financial report and the purpose of each expenditure (Ark. Code Ann. § 7-9-407(3)).

Regarding the expenditure provisions in subsection 7-9-407(3), the Arkansas Ethics Committee has explained that, when a committee pays a third party who then makes expenditures on behalf of the committee, the committee must list the actual person or entity to which money

ultimately went and may not simply report the name of the consultant/middle-man entity. *See Ark. Ethics Comm'n Case No. 2011-CO-016 (Final Order entered Jan 13, 2012).*

RTR has violated all of the aforementioned provisions of Arkansas Code Annotated § 7-9-407 in multiple ways as described herein. This document will address both of RTR's filings separately, in reverse chronological order.

September 7, 2021 Report

-lacks an entry for "Date of Receipt" for all twenty-five (25) contributions listed, in violation of Arkansas Code Annotated §§ 7-9-407(2)(A)(vii)-(viii);

-lacks street addresses for Scotty White, Virgil Doyne, McGeorge Contracting, McClelland Consulting Engineering, Baptist Health, Merrick Dake, and Bernhard Energy, in violation of Arkansas Code Annotated § 7-9-407(2)(A)(vii);

-lacks a complete street address for Garver Engineering, stating only "4701 Northshore Dr," without specifying that it is a North Little Rock address, in violation of Arkansas Code Annotated § 7-9-407(2)(A)(vii);

-lacks an entry for "Place of Business Employer/Occupation" for Dionne Jackson, Virgil Doyne, and Bernhard Energy, in violation of Arkansas Code Annotated § 7-9-407(2)(A)(viii);

-lists "McGeorge *Contracting*" as a contributor, but lists "McGeorge *Consulting*" as the principal place of business, suggesting that one of the two entries is incorrect, in violation of Arkansas Code Annotated §§ 7-9-407(2)(A)(vii) and/or -407(2)(A)(viii);

-lists "*McClelland* Consulting Engineering" as a contributor, but lists "*McLelland* Consulting" as the principal place of business (without providing a street address, as noted above), suggesting that one of the two entries is incorrect, in violation of Arkansas Code Annotated §§ 7-9-407(2)(A)(vii) and/or -407(2)(A)(viii);

-lacks an entry for "Date" for all six (6) expenditures listed, in violation of Arkansas Code Annotated § 7-9-407(3);

-lacks a street address for the expenditure made to Raise the Money, in violation of Arkansas Code Annotated § 7-9-407(3);

-lists a \$36,556.41 expenditure to McLarty Consulting for “Mailers,” but does not specify the printing company or companies that actually created the mailers, in violation of Arkansas Code Annotated § 7-9-407(3);

-lists a \$48,196.62 expenditure to McLarty Consulting for “Radio,” but does not specify the radio station(s) that some or all of the expended funds actually went to, in violation of Arkansas Code Annotated § 7-9-407(3);

-lists a \$23,741.70 expenditure to McLarty Consulting for “Social Media,” but does not specify the social media company/companies that some or all of the expended funds actually went to, in violation of Arkansas Code Annotated § 7-9-407(3);

-fails to list the appropriate suite number for First Financial Bank (suite 150) and McLarty Consulting (suite 915) in the addresses for those companies, simply giving the same “1501 N University Ave.” address for both, in violation of Arkansas Code Annotated § 7-9-407(3); and

-lacks any stated expenditures for the cost of sending text messages to potential voters, despite the fact that multiple would-be voters received one or more text messages in support of RTR, suggesting another violation of Arkansas Code Annotated § 7-9-407(3).

August 16, 2021 Report

- lacks street addresses for Sam Alley, Clark, Jeffrey Hathaway, AR Zoological Foundation, Rhett Tucker, and Little Rock Realtors Association, in violation of Arkansas Code Annotated § 7-9-407(2)(A)(vii);

- lacks an entry for “Place of Business Employer/Occupation” for James Bryant and Rhett Tucker, in violation of Arkansas Code Annotated § 7-9-407(2)(A)(viii);

- lists a \$30,531.30 expenditure to McLarty Consulting for “Direct Mailers,” but does not specify the printing company or companies that actually created the mailers, in violation of Arkansas Code Annotated § 7-9-407(3);

-lists a \$530 expenditure to McLarty Consulting for “Puash Cards,” but does not specify who created and/or printed the push cards, in violation of Arkansas Code Annotated § 7-9-407(3);

-lists a \$23,914.50 expenditure to McLarty Consulting for “Digital Buy, Social, Web, Creative,” but does not specify the company/companies that received funds for the “digital buy,” does not specify the social media company/companies that received any of these funds, does not specify the company or companies that were paid for “Web” from these funds, and does not specify who was paid for “Creative” from these funds, all in violation of Arkansas Code Annotated § 7-9-407(3);

- fails to list the appropriate suite number for McLarty Consulting (suite 915) in the address, simply giving a "1501 N University Ave." address, in violation of Arkansas Code Annotated § 7-9-407(3); and

-lacks any stated expenditures for the cost of sending text messages to potential voters, despite the fact that multiple would-be voters received one or more text messages in support of RTR, suggesting another violation of Arkansas Code Annotated § 7-9-407(3).

Based on the foregoing, it appears that RTR's financial-disclosure reports contain over 64 discrete violations of the reporting requirements of Arkansas Code Annotated § 7-9-407. The Arkansas Ethics Committee is tasked with ensuring compliance with the provisions of that statute pursuant to Arkansas Code Annotated § 7-9-411 and Arkansas Code Annotated § 7-6-217(g)(3). Given the pervasive nature of the errors and omissions in RTR's two disclosure reports, the Complainant herein believes that a fine of between \$50 and \$3,500 for each violation, is warranted. *See Ark. Code Ann. § 7-6-218(a)(4)(B)(i).*

ARKANSAS ETHICS COMMISSION
910 WEST SECOND STREET, SUITE 100
LITTLE ROCK, AR 72201
Phone (501) 324-9600 Toll Free (800) 422-7773

CITIZEN COMPLAINT FORM

The undersigned person files this complaint and requests that the Arkansas Ethics Commission conduct an investigation concerning the facts and actions detailed below for the purpose of determining whether or not there has been a violation of laws under the Commission's jurisdiction.

1. Identify the person you are complaining about:

Name: RESPONSIBLE TAXATION FOR LITTLE ROCK Position or Title: _____
Address: 701 W. 7TH ST., SUITE 1500 Phone: (Home) _____
LITTLE ROCK, AR 72201 (Work) 501-257-0993

2. State in your own words the *detailed* facts and the actions of the person named in section 1 which prompted you to make this complaint. The brief space provided below is not intended to limit your statement of facts. Please use the back of this form or additional sheets if necessary. Include relevant dates, times, and the names, and addresses of other persons whom you believe have knowledge of the facts.

PLEASE SEE APPENDIX A, ATTACHED HERETO

3. Attach or make reference to any documents, materials, minutes, resolutions or other evidence which support your allegations.

State of Arkansas
County of Pulaski

I swear or affirm, under penalty of perjury, that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief.

Subscribed and sworn before me this
15 day of September, 2021.

Signature: [Signature]

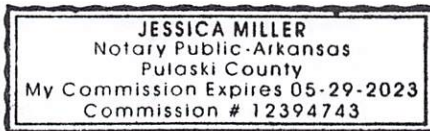
Print your name: MATTHEW CAMPBELL

Notary Signature: [Signature]

Mailing address: 104 WINNWOOD RD
LITTLE ROCK, AR 72207

My Commission Expires: 5/29/2023

Phone: (Home) _____ (Work) 501-396-9246



Appendix A

Specific Allegations of Reporting Violations

The “Responsible Taxation for Little Rock” committee (hereinafter “RTLr”) is a legislative question committee (“LCQ”) as that is defined in Arkansas Code Annotated § 7-9-402(10)(A). As an LCQ, RTLr is required to file certain financial disclosure reports which contain the information mandated by Arkansas Code Annotated § 7-9-407. As is relevant to this complaint, section 7-9-407 requires, *inter alia*, the following information:

- The name and street address of each person who contributed fifty dollars or more during the period covered by the financial report, together with the amount contributed, the date of receipt, and the cumulative amount contributed by that person for each ballot question or legislative question (Ark. Code Ann. § 7-9-407(2)(A)(vii));

- For each person listed under subdivision (2)(A)(vii) of this section, the contributor’s principal place of business, employer, occupation, the amount contributed, the date the contribution was accepted by the committee, and the cumulative amount contributed for each ballot question or legislative question (Ark. Code Ann. § 7-9-407(2)(A)(viii)); and

- The name and street address of each person to whom expenditures totaling one hundred dollars (\$100) or more were made by the committee, individual person, or elected official using public funds, or on behalf of the committee, individual person, or elected official using public funds, by an advertising agency, public relations firm, or political consultant, together with the date and amount of each separate expenditure to each person during the period covered by the financial report and the purpose of each expenditure (Ark. Code Ann. § 7-9-407(3)).

Regarding the expenditure provisions in subsection 7-9-407(3), the Arkansas Ethics Committee has explained that, when a committee pays a third party who then makes expenditures on behalf of the committee, the committee must list the actual person or entity to which money

ultimately went and may not simply report the name of the consultant/middle-man entity. *See Ark. Ethics Comm'n Case No. 2011-CO-016 (Final Order entered Jan 13, 2012).*

RTLRL has violated all of the aforementioned provisions of Arkansas Code Annotated § 7-9-407 in multiple ways as described herein. This document will address both of RTLRL's filings separately, in reverse chronological order.

September 7, 2021 Report

-lacks street addresses for Ronald Cameron, Arkansas Competes, and James Purifoy, in violation of Arkansas Code Annotated § 7-9-407(2)(A)(vii);

-lacks required information for "Place of Business Employer/Occupation" for Drew Dees, Brent Staley, Dani Martin, Andrew Collins Jr., Russell Matchett, Ryan Holder, Kathy / Pat Meriwether, John Nabholz, Michael McAfee, Tad Phillips, Andy Rossi, James Purifoy, Ralph Bradbury, and Lisenne Rockefeller, in violation of Arkansas Code Annotated § 7-9-407(2)(A)(viii);

-lacks a street address for the expenditure made to Raise the Money, in violation of Arkansas Code Annotated § 7-9-407(3);

-lists a \$5,000 expenditure to Red Tusk Campaigns for "Digital Marketing," but does not specify the company or companies that were actually paid for some or all of the marketing that was done, in violation of Arkansas Code Annotated § 7-9-407(3);

- lists a \$7,500 expenditure to Red Tusk Campaigns for "Digital Marketing," but does not specify the company or companies that were actually paid for some or all of the marketing that was done, in violation of Arkansas Code Annotated § 7-9-407(3);

-- lists a second \$7,500 expenditure to Red Tusk Campaigns for "Digital Marketing," but does not specify the company or companies that were actually paid for some or all of the marketing that was done, in violation of Arkansas Code Annotated § 7-9-407(3);

August 16, 2021 Report

- lacks street address for Little Rock Athletic Centers, in violation of Arkansas Code Annotated § 7-9-407(2)(A)(vii); and

- lacks an entry for "Place of Business Employer/Occupation" for Little Rock Athletic Centers, Dennis Adkins, Andrew Kurrus, June Matheny, Mary Wells, Steve Ratcliff, and Melanie Fox, in violation of Arkansas Code Annotated § 7-9-407(2)(A)(viii);

Based on the foregoing, it appears that RTLR's financial-disclosure reports contain at least 29 discrete violations of the reporting requirements of Arkansas Code Annotated § 7-9-407. The Arkansas Ethics Committee is tasked with ensuring compliance with the provisions of that statute pursuant to Arkansas Code Annotated § 7-9-411 and Arkansas Code Annotated § 7-6-217(g)(3). Given the pervasive nature of the errors and omissions in RTR's two disclosure reports, the Complainant herein believes that a fine of between \$50 and \$3,500 for each violation, is warranted. *See Ark. Code Ann. § 7-6-218(a)(4)(B)(i).*