

**BEFORE THE GEORGIA GOVERNMENT TRANSPARENCY AND
CAMPAIGN FINANCE COMMISSION
STATE OF GEORGIA**

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IN THE MATTER OF:

* **CASE NO.: 22-0089-C**

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KHADIJAH ABDUR-RAHIM

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COMPLAINT

COMES NOW, the Georgia Government Transparency and Campaign Finance Commission (hereinafter “Commission”) and files this Complaint (hereinafter “Complaint”) against Khadijah Abdur-Rahim (hereinafter “Respondent”) and asserts the following:

1.

The Respondent is a resident of Fulton County, State of Georgia.

2.

Respondent currently serves as the District 6 Fulton County Commissioner after being elected during the 2020 general election cycle, and, therefore, is subject to the jurisdiction and venue of this Commission. Respondent was previously an unsuccessful candidate for the same public office for which she ran in a special election held on September 17, 2019. *See* O.C.G.A. § 21-5-2 (The Commission is charged with the enforcement of the Georgia Government Transparency and Campaign Finance Act (hereinafter “Act”) in order to protect the integrity of the democratic process and hold public officers accountable).

3.

Respondent may be served according to law at her addresses listed with the Commission; to wit: 373 Cativo Drive, Atlanta, Georgia, 30311 and 141 Pryor Street, Floor 10, Atlanta, GA, 30303.

4.

On June 21, 2019, Respondent filed her declaration of intention (“DOI”) to accept campaign contributions for a special election for the District 6 Fulton County Commission seat in which she was an unsuccessful candidate. On March 5, 2020 Respondent filed her DOI for the same public office, Respondent was the successful candidate in this election. As the Respondent was seeking a position with a four-year term of office, the Act requires that any action alleging a violation of its terms must be commenced within five years from the date of filing of the first report containing said violation. O.C.G.A. § 21-5-13.¹ In the case *sub judice*, the Commission instituted the above-referenced case on June 1, 2022. As such, this complaint is not barred by the five-year statute of limitations pursuant to O.C.G.A. § 21-5-13.

5.

The Georgia General Assembly promulgated the Campaign Finance Act in order to ensure that public officials and candidates for public office regularly and fully disclose the amount and sources of their campaign contributions and expenditures. To that end, the Georgia General Assembly also instituted a very specific filing regimen that requires public officials and candidates for public office to regularly report their campaign contributions and campaign expenditures to the Commission and general public. *See generally* O.C.G.A. § 21-5-34.

¹ The Campaign Finance Act defines the commencement of an action for purpose of tolling the relevant statute of limitations as (1) the acceptance of a complaint pursuant to Code Section 21-5-7; or (2) the service of a summons or hearing notice by the Commission and/or the Attorney General notifying such person of the alleged violation of the Campaign Finance Act in accordance with O.C.G.A. § 50-13-1, *et seq.*

6.

A candidate for public office who files a DOI for a special election is required to file one CCDR which is due 15 days prior to the special election. *See* O.C.G.A. § 21-5-34.

7.

Respondent failed to timely file her CCDR 15 days prior to the special election in violation of O.C.G.A. § 21-5-34(c)(4).

8.

Candidates for public office in an election year are required to file a CCDR six times in an election year on January 31, April 30, June 30, September 25, October 25, and December 31. *See* O.C.G.A. § 21-5-34.

9.

Respondent failed to file her Campaign Contribution Disclosure Reports within the applicable filing periods as contained in O.C.G.A. §§ 21-5-34(c)(2)(A) and (c)(1)(B) to wit:

- a) Respondent failed to file her April 30, 2020 Campaign Contribution Disclosure Report in violation of O.C.G.A. § 21-5-34(c)(2)(A). *See* Exhibit “A”.
- b) Respondent failed to timely file her June 30, 2020 Campaign Contribution Disclosure Report in violation of O.C.G.A. § 21-5-34(c)(2)(A). *See* Id.
- c) Respondent failed to file her September 30, 2020 Campaign Contribution Disclosure Report in violation of O.C.G.A. § 21-5-34(c)(2)(A). *See* Id.
- d) Respondent failed to timely file her October 25, 2020 Campaign Contribution Disclosure Report in violation of O.C.G.A. § 21-5-34(c)(2)(A). *See* Id.
- e) Respondent failed to timely file her December 31, 2020 Campaign Contribution Disclosure Report in violation of O.C.G.A. § 21-5-34(c)(2)(A). *See* Id.
- f) Respondent failed to timely her December 31, 2021 Campaign Contribution Disclosure Report in violation of O.C.G.A. § 21-5-34(c)(1)(B). *See* Id.

10.

The General Assembly enacted a requirement that requires public officials and candidates for public office to disclose their personal financial holdings, through a personal financial disclosure statement (hereinafter “PFDS”), on a yearly basis so that the electorate will have the

opportunity to identify potential self-dealing in the official's/candidate's public acts. *See generally*, O.C.G.A. § 21-5-50.

11.


In this matter, Respondent failed to timely file her calendar year 2020 PFDS in violation of O.C.G.A. § 21-5-50. *See Id.*

WHEREFORE, Commission staff prays 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 Campaign Finance Act is substantiated, Respondent be appropriately sanctioned by the Commission for violation of the Campaign Finance Act in accordance with O.C.G.A. § 21-5-6(14);

Respectfully submitted, this the 1 day of June, 2022.

Georgia Government Transparency and
Campaign Finance Commission



Joseph Cusack, Deputy General Counsel
Georgia State Bar No.: 492674

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KHADIJAH ABDUR-RAHIM


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* CFC CASE NO.: 22-0089-C
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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 State mail with adequate postage affixed thereto and addressed as follows:

Khadijah Abdur-Rahim
373 Cativo Drive
Atlanta, Georgia 30311
and
141 Pryor Street, Floor 10
Atlanta, GA 30303

This 1 day of June, 2022.



Joseph Cusack
Georgia State Bar No.: 492674
Georgia Government Transparency and
Campaign Finance Commission



REGISTRATION
& ELECTIONS

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| Khadijah Abdur Rahman - 2021 December 31 Non Election Year CCDR - Board of Commissioners District 6 | 01/19/22 | Campaign Contributions Disclosure Report |
| Khadijah Abdur Rahman - 2019 Non Election Year PFDS - Board of Commissioners District 6 | 07/09/21 | Personal Financial Disclosure Report |
| Khadijah Abdur Rahman - 2020 June 30 Non Election Year CCDR - Board of Commissioners District 6 | 07/09/21 | Campaign Contributions Disclosure Report |
| Khadijah Abdur Rahman - 2020 October 25 CCDR - Board of Commissioners District 6 | 11/20/20 | Campaign Contributions Disclosure Report |
| Khadijah Abdurrahman intentDis 6 | 03/05/20 | Declaration of Intent |
| Khadijah Abdurrahman CDR | 02/07/20 | Campaign Contributions Disclosure Report |
| Khadijah Abdurrahman CDR | 01/09/20 | Campaign Contributions Disclosure Report |
| Khadijah DIS 6 PFDR | 07/14/19 | Personal Financial Disclosure Report |
| Khadijah DOI DIS 6 | 06/21/19 | Declaration of Intent |

