

ROBBINS

LITIGATION AND REGULATORY LAW

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March 20, 2018

VIA FEDERAL EXPRESS AND EMAIL

The Honorable Brian P. Kemp
Georgia Secretary of State
214 State Capitol
Atlanta, Georgia 30334
Attn: Chris Harvey, Elections Director
charvey@sos.ga.gov

**Re: Challenge to the Eligibility and Qualifications of Joshua McLaurin
Candidate for Georgia State House of Representatives District 51**

Dear Secretary Kemp:

Our law firm represents Gabriel Sterling, a registered voter and eligible elector in Georgia State House of Representatives District 51 ("House District 51"). Mr. Sterling resides and is registered to vote at 2401 Huntingdon Chase, Sandy Springs, GA 30350. Pursuant to O.C.G.A. § 21-2-5, Mr. Sterling hereby challenges the eligibility and qualifications of Joshua McLaurin, a candidate for the office of State Representative for House District 51, to seek and hold that office.

It is well established under Georgia law that the burden of proof in an action challenging the eligibility of a candidate for office is placed entirely upon the candidate to establish his eligibility for office. *Haynes v. Wells*, 273 Ga. 106, 108-09 (2000). The party challenging the candidate "is not required to disprove anything" regarding the candidate's eligibility to run for office. *Id.* As further detailed below, certified records from the Board of Elections for the City of New York and the Georgia Secretary of State's Office indicate that Joshua McLaurin has not maintained citizenship in Georgia for the past two years and has not been a legal resident of House District 51 for the past year, as required by the Constitution of the State of Georgia.

I. Background

The General Election for House District 51 is November 6, 2018. On March 5, 2018, Joshua McLaurin filed a sworn Declaration of Candidacy and Affidavit ("Declaration") with the

Democratic Party of Georgia to qualify as a candidate for House District 51.¹ Mr. McLaurin's Declaration indicates that he resides at 91 Spalding Trl NE, Atlanta, Georgia 30328. *Id.* In his Declaration, Mr. McLaurin swore under oath that he has been a legal resident of the State of Georgia for two consecutive years and a legal resident of House District 51 for one year. *Id.*

According to certified records of the Board of Elections in the City of New York, Mr. McLaurin registered to vote in New York on March 24, 2016.² Mr. McLaurin gave a sworn statement in his voter registration application that he resided at 439 E 6th St., Apt. 5F, New York, NY 10009 at that time. Mr. McLaurin subsequently voted in New York on April 19, 2016 for the Presidential Preference Primary.³ Mr. McLaurin's voter file from the Board of Elections in the City of New York indicates that Mr. McLaurin's official voter registration date was March 29, 2016 and that Mr. McLaurin's voter registration was active until May 28, 2017. The Board of Elections was notified by the United States Postal Service on or about May 28, 2017 that Mr. McLaurin changed his residence to 12175 Brookfield Drive, Roswell, Georgia 30075. *See* Exhibit "C".

While Mr. McLaurin was registered to vote and voted in New York, he also remained registered to vote and voted in Georgia, including in the April 18, 2017 Federal Special Election.⁴ After changing his residence to 12175 Brookfield Drive in 2017 and becoming inactive on New York's voter rolls in May 2017, Mr. McLaurin again changed his residence. According to the absentee voter file for the June 20, 2017 Federal Special Election Runoff for the Sixth Congressional District election, Mr. McLaurin's residential address for his voter registration was 10009 Cicero Drive, Alpharetta, Georgia 30022.⁵ Mr. McLaurin's residence on Cicero Drive is not within House District 51.

Despite Mr. McLaurin's continually changing addresses, Mr. McLaurin continued using his Roswell residence as his address. According to the Campaign Contribution Disclosure Report of the "Campaign to Elect Lucy McBath for HD37" filed with the Georgia Government

¹ A certified copy of Mr. McLaurin's Declaration of Candidacy and Affidavit is attached hereto as Exhibit "A".

² A certified copy of Mr. McLaurin's voter registration application with the Board of Elections in the City of New York is attached hereto as Exhibit "B".

³ Certified copies of Mr. McLaurin's voter data sheet, voter activity sheet, and voter history sheet from the Board of Elections in the City of New York is attached hereto as Exhibit "C".

⁴ A certified copy of Mr. McLaurin's voter history file from the Georgia Secretary of State's Office is attached hereto as Exhibit "D".

⁵ The absentee file for the June 20, 2017 Federal Special Election Runoff is available at <http://elections.sos.ga.gov/Elections/voterabsenteefile.do>.

Transparency and Campaign Finance Commission on February 7, 2018, Mr. McLaurin indicated that his address was once again 12175 Brookfield Club Drive, Roswell, Georgia 30075-1263.⁶ Mr. McLaurin's residence at 12175 Brookfield Club Drive in Roswell is also not in House District 51.

II. Law and Analysis

The Georgia Election Code requires that "[e]very candidate for federal and state office who is certified by the state executive committee of a political party or who files a notice of candidacy shall meet the constitutional and statutory qualifications for holding the office being sought." O.C.G.A. § 21-1-5(a). The Georgia Constitution establishes the qualifications to hold a seat in the General Assembly. In relation to the Georgia House of Representatives, the Georgia Constitution provides:

At the time of their election, the members of the House of Representatives shall be citizens of the United States, shall be at least 21 years of age, shall have been citizens of this state for at least two years, and shall have been legal residents of the territory embraced within the district from which elected for at least one year.

Ga. Const. art. III, § II, ¶ III(b). The residency requirements are for the years immediately preceding the election. *See Griggers v. Moya*, 246 Ga. 578, 580 (1980); *see also Cox v. Barber*, 275 Ga. 415, 416-17 (2002); 1989 Op. Att'y Gen. 89-31, 1989 WL 411651.

To be eligible to be a candidate for House District 51, Mr. McLaurin must have maintained citizenship in Georgia since at least November 6, 2016, and he must have been a legal resident of House District 51 since at least November 6, 2017. Mr. McLaurin does not meet the eligibility requirements to seek or hold office as State Representative for House District 51.⁷

A. McLaurin Does Not Satisfy the Two-Year Citizenship Requirement

Pursuant to the Georgia Constitution, members of the Georgia House of Representatives "shall have been citizens of this state for at least two years . . ." at the time of the election. Ga. Const. art. III, § II, ¶ III(b). "All citizens of the United States, resident in this state, are hereby declared citizens of this state." Ga. Const. art. I, § 1, ¶ VII. Similarly, the United States

⁶ A true and accurate copy of the relevant portions of the Campaign Contribution Disclosure Report of the "Campaign to Elect Lucy McBath for HD37" is attached as Exhibit "E".

⁷ A timeline outlining relevant dates in this matter is attached hereto as Exhibit "F".

Constitution provides that “all persons born or naturalized in the United States . . . are citizens of the United States **and of the State wherein they reside.**” U.S. Const. Amend. XIV, § 1 (emphasis added). “Until citizenship is acquired elsewhere, a citizen of this state continues to be a citizen of this state and of the United States.” O.C.G.A. § 1-2-3.

Under Georgia law, a person who goes into another state and registers to vote is deemed to have lost his or her residence in Georgia. O.C.G.A. § 21-2-217(a)(2). Moreover, “if a person goes into another state and while there exercises the right of a citizen by voting, such person shall be considered to have lost such person's residence in this state.” O.C.G.A. § 21-2-217(a)(13). Thus, by going into another state and either registering to vote or exercising the right to vote in that state, a person is considered under Georgia law to no longer be a resident of this state. *See* O.C.G.A. §§ 21-2-217(a)(2), 21-2-217(a)(9). In turn, a person who is not a resident of Georgia cannot be a citizen of this state. *See* Ga. Const. art. I, § 1, ¶ VII.

Mr. McLaurin ceased being a citizen of Georgia in 2016 when he began residing in New York and became a citizen of New York. *See* U.S. Const. Amend. XIV, § 1; O.C.G.A. § 1-2-3. Mr. McLaurin affirmed on March 24, 2016 in his New York voter registration form that he resided in New York at 439 E 6th St., Apt. 5F, New York, NY 10009. *See* Exhibit “B”. Mr. McLaurin then proceeded to vote in New York’s Presidential Preference Primary on April 19, 2016. *Id.* Under Georgia law, Mr. McLaurin was no longer a resident of this state as a result of these actions. *See* O.C.G.A. §§ 21-2-217(a)(2), 21-2-217(a)(9). Furthermore, by residing in New York, as evidenced in his voter registration, Mr. McLaurin became a citizen of the State of New York and ceased being a citizen of Georgia. *See* U.S. Const. Amend. XIV, § 1; O.C.G.A. § 1-2-3.

The evidence indicates that Mr. McLaurin resided in New York and was thus a citizen of that state until sometime in 2017. Mr. McLaurin ceased being a citizen of this state beginning in March 2016. Mr. McLaurin remained a registered voter in New York until May 28, 2017, when he became an inactive voter in New York and updated his residence to 12175 Brookfield Drive, Roswell, Georgia 30075. *See* Exhibit “C”. Although Mr. McLaurin might have also violated Georgia law by remaining registered in Georgia and voting in Georgia after he had registered to vote in New York,⁸ Mr. McLaurin was not a citizen of Georgia for the two years preceding the election, and as such, Mr. McLaurin is not eligible to be a candidate for House District 51.

⁸ Georgia law clearly states, “[n]o person shall remain an elector longer than such person shall retain the qualifications under which such person registered.” O.C.G.A. § 21-2-216(f).

B. McLaurin Does Not Satisfy the One-Year District Residency Requirement

In addition to being a citizen of Georgia for at least two years, a member of the Georgia House of Representatives is required to be a legal resident of his or her House District for at least one year. Ga. Const. art. III, § II, ¶ III(b). In reviewing this provision of the Georgia Constitution, the Georgia Attorney General has opined that a candidate for the General Assembly must meet this residency requirement for the year immediately preceding the election for that office. Ga. Op. Atty. Gen. No. 89-31, 1989 WL 411651. The General Assembly has also provided by statute that “[a] member of the House of Representatives . . . at the time of such member's election shall have been a resident of the territory embraced within such district for at least one year *preceding such time*.” O.C.G.A. § 28-2-1(b) (emphasis added).

In determining the residency of a candidate, the term “residence” refers to “domicile.” O.C.G.A. § 21-2-2(32). *See also Handel v. Powell*, 284 Ga. 550; *Clark v. Hammock*, 228 Ga. 157 (1971). The determination of a person's “domicile” is a factual question; however, the General Assembly has established a series of rules for determining residency, which are set forth in O.C.G.A. § 21-2-217(a). The rules contained in O.C.G.A. § 21-2-217(a) are to be followed so far as they are applicable. O.C.G.A. § 21-2-217(a). *See also Handel v. Powell*, 284 Ga. 550, 554 (2008).

Mr. McLaurin does not satisfy the constitutional and statutory requirement that he reside in House District 51 for at least one year preceding the election. Even though Mr. McLaurin may reside at 91 Spalding Trl NE, Atlanta, Georgia 30328, he has not established residency there. State law provides:

[a] person shall not be considered to have gained a residence in any county or municipality of this state into which such person has come for temporary purposes only without the intention of making such county or municipality such person's permanent place of abode;

O.C.G.A. § 21-2-217(a)(3). Mr. McLaurin has demonstrated through his multiple changes of address that he maintains a somewhat transitory lifestyle. Therefore, in determining his residency, it is all the more important to look at where he intends to remain. *See* O.C.G.A. § 21-2-217(a)(2). As demonstrated by his contribution to the campaign of Lucy McBath, Mr. McLaurin's intent is to remain at 12175 Brookfield Club Drive, Roswell, Georgia 30075-1263. For this reason, Mr.

The Honorable Brian P. Kemp
McLaurin Candidate Challenge
March 20, 2018
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McLaurin does not satisfy the requirement that he reside in House District 51 for at least one year preceding the election. *See* Ga. Const. Art. III, § II, Par. III(b); O.C.G.A. § 28-2-1(b).

III. Conclusion

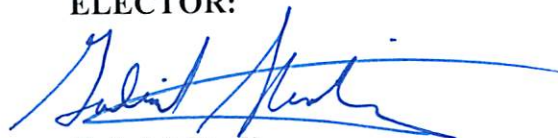
Mr. McLaurin is not qualified and eligible to be a candidate for House District 51 in the 2018 General Election. Accordingly, we respectfully request that the Secretary of State withhold Joshua McLaurin's name from the ballot or strike Mr. McLaurin's name from the ballot if the ballots have been printed. Thank you for your attention to this matter.

Sincerely,



Vincent R. Russo

ELECTOR:



Gabriel Sterling

VRR/klm
Enclosures

EXHIBIT A



OFFICE OF SECRETARY OF STATE

*I, Brian P. Kemp, Secretary of State of the State of Georgia, do
hereby certify that*

the attached 2 pages are a true and correct copy of the official
Declaration of Candidacy and Affidavit of Joshua Ivan McLaurin for the
office of State Representative, District 51 dated March 5, 2018; all as the
same appears on file and record of this office.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed
the seal of my office, at the Capitol, in the City of Atlanta, this
14th day of March, in the year of our Lord Two Thousand and
Eighteen and of the Independence of the United States of
America the Two Hundred and Forty-Second.



B. P. Kemp

Brian P. Kemp, Secretary of State

To: The Chairman and Secretary of
State Executive Committee of the
DEMOCRATIC Party
State of Georgia

DECLARATION OF CANDIDACY AND AFFIDAVIT
(STATE)

I, the undersigned, being first duly sworn on oath, do depose and say: my name is JOSHUA IVAN MCLAURIN

my residence address is 91 SPALDING TR. NE
(Street Number) (Street)

ATLANTA FULTON GA 30328
(City) (County) (State) (Zip Code)

my post office address is PO BOX 567297 ATLANTA GA 31156

my telephone number is _____
(Business) (Home)

my profession, business, occupation (if any) is ATTORNEY

the name of my precinct is SS26; I am an elector of the county of my

residence and eligible to vote in the primary election in which I am a candidate for nomination; the name of the office

I am seeking is STATE REPRESENTATIVE, DISTRICT 51; my date of birth is 1988
(Circuit, District, or Post if Applicable)

I have been a legal resident of the State of Georgia for 2 consecutive years; I have been a legal resident

of FULTON county for 2 consecutive years; I have been a legal resident of my district (if applicable)

for 1 consecutive years; I have been a legal resident of my circuit (if applicable) for _____

consecutive years; I am a citizen of the United States; I am eligible to hold such office; I am a candidate for

nomination in the DEMOCRATIC GENERAL PRIMARY to be held on the 22 day of May, 2018
(Primary)

I have never been convicted and sentenced in any court of competent jurisdiction for fraudulent violation of primary or election laws, malfeasance in office, or felony involving moral turpitude or conviction of domestic violence under the laws of this State, any other State, or of the United States, or, if so convicted that my civil rights have been restored and at least ten years have elapsed from the date of the completion of the sentence without a subsequent conviction of another felony involving moral turpitude; I am not a defaulter for any federal, state, county, municipal, or school system taxes required of such officeholder or candidate if such person has been finally adjudicated by a court of competent jurisdiction to owe those taxes, but such ineligibility may be removed at any time by full payment thereof, or by making payments to the tax authority pursuant to a payment plan, or under such other conditions as the General Assembly may provide by general law (pursuant to Ga. Const. Art. II, Sec. II, paragraph III); I will not knowingly violate any provisions of the Georgia Election Code (O.C.G.A. § 21-2) or of the rules or regulations adopted thereunder; I will not knowingly violate the rules or regulations of the Democratic party

I understand that any false statement knowingly made by me in this Declaration of Candidacy and Affidavit will subject me to criminal penalties as provided by law and I hereby request you to ~~cause my name to be placed on the~~ ballots to be used in such primary election as a candidate for the nomination I am seeking.

(Signature of Candidate)

Sworn to and subscribed before this _____ day of March, 2018

(Notary Public)

My Commission Expires: 02/20/2022

(Required by Ga. Election Code O.C.G.A. § 21.2.153.)

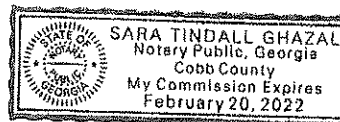
I desire that my name appear on the ballot as follows (the surname of the candidate shall be as it appears on the candidate's voter registration card):

JOSH MCLAURIN
(Please Print)

Should I be elected, I desire that my name appear on official documents as follows:

JOSHUA IVAN MCLAURIN
(Please Print)

(over)



1. ☒ I hereby tender check/cash in the amount of \$400.00

NAME OF BANK: _____

CHECK NUMBER: _____

In the event that a candidate pays his or her qualifying fee with a check that is subsequently returned for insufficient funds, the Secretary of State shall automatically find that such candidate has not met the qualifications for holding the office being sought, unless the bank, credit union, or other financial institution returning the check certifies in writing by an officer's or director's oath that the bank, credit union, or financial institution erred in returning the check as prescribed in O.C.G.A. § 21-2-5(d).

☐ I hereby file a Pauper's Affidavit, accompanied by a qualifying petition as prescribed in O.C.G.A. § 21-2-153 (a.1), in lieu of paying the qualifying fee.

Form #DC-S-09

EXHIBIT B



The Board of Elections in the City of New York

1 It is a crime to procure a false registration or to furnish false information to the Board of Elections. Please print in blue or black ink.

1 Qualifications

1 Are you a citizen of the U.S.? ☒ Yes ☐ No
If you answer No, you cannot register to vote.

2 Will you be 18 years of age or older on or before election day? ☒ Yes ☐ No
If you answer No, you cannot register to vote unless you will be 18 by the end of the year.

Your name

3 Last name McLaurin Suffix
First name Joshua Middle Initial H

More information
Items 5, 6 & 7 are optional

4 Birth date 01/11/1988 5 Sex ☒ M ☐ F
6 Phone 404-444-0114 7 Email joshivan@gmail.com

The address where you live

8 Address (not P.O. box) 439 E 6th St.
Apt. Number 5F Zip code 10009
City/Town/Village New York, NY
New York State County 1

The address where you receive mail
Skip if same as above

9 Address or P.O. box
P.O. Box Zip code
City/Town/Village

Voting history

10 Have you voted before? ☒ Yes ☐ No 11 What year? 2012

Voting information that has changed
Skip if this has not changed or you have not voted before

12 Your name was Joshua McLaurin
Your address was 4231 Highborne Drive, Marietta GA 30066
Your previous state or New York State County was n/a

Identification

You must make 1 selection
For questions, please refer to
Verifying your identity above.

13 ☐ New York State DMV number
☐ Last four digits of your Social Security number x x x - x x -
☐ I do not have a New York State driver's license or a Social Security number.

Political party

You must make 1 selection

Political party enrollment is optional but that, in order to vote in a primary election of a political party, a voter must enroll in that political party, unless state party rules allow otherwise.

14 I wish to enroll in a political party
☒ Democratic party
☐ Republican party
☐ Conservative party
☐ Green party
☐ Working Families party
☐ Independence party
☐ Women's Equality party
☐ Reform party
☐ Other
I do not wish to enroll in a political party
☐ No party

16 Affidavit: I swear or affirm that

- I am a citizen of the United States.
- I will have lived in the county, city or village for at least 30 days before the election.
- I meet all requirements to register to vote in New York State.
- This is my signature or mark in the box below.
- The above information is true, I understand that if it is not true, I can be convicted and fined up to \$5,000 and/or jailed for up to four years.

Sign

Date

Optional questions

15 ☐ I need to apply for an Absentee ballot.
☐ I would like to be an Election Day worker.

2016 MAR 29 A H:34
VOTER REGISTRATION DEPT.
BOARD OF ELECTIONS
CITY OF NEW YORK

THIS IS TO CERTIFY THAT
THIS IS A TRUE COPY OF
THE ORIGINAL DOCUMENT

[Signature]
Feb. 29, 2018

EXHIBIT C



Board of Elections in the City of New York

Serial No: 412274628
Name: MCLAURIN, JOSHUA, I
Street: 439 EAST 6 STREET 5F
City/Zip: NEW YORK 10009
DOB: 01/17/88
Sex: M
US Citizen: Y
Care of Name:

Status: Inactive As of 05/28/17
ED/AD: 021/074
Enrollment: Democratic
Registration Date: 03/29/16
Future Enrollment :
Future Enrollment Date:
Voter Type: R

Mailing Address

Line 1:
Line 2:
Line 3:
Line 4:

Poll site Information

Site Num/Name: M0080-Village View Housing
Address: 175 East 4 Street New York 10009

Accessible: Y Status:

District Information

CD: 12 SD: 27 CO: 02 CC: 2 LD : 12

THIS IS TO CERTIFY THAT
THIS IS A TRUE COPY OF
THE ORIGINAL DOCUMENT

[Signature]
Feb. 20, 2018



Board of Elections in the City of New York

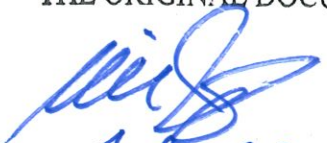
Serial No: 412274628
Name: MCLAURIN, JOSHUA, I
Street: 439 EAST 6 STREET 5F
City/Zip: NEW YORK 10009
DOB : 01/17/88

Status : Inactive As of 05/28/17
ED/AD : 021/074
Enrollment : Democratic
Registration Date : 03/29/16

Activities to the Voter Record:

Date	OP ID	CD	Description
05/28/17	USPSNCOA	95	USPS NON-CITY ADDRESS CHG
Changed from: 439 E 6TH ST 5F NEW YORK 10009 Changed to: 12175 BROOKFIELD			
05/28/17	MIS	0	CH STATUS
Changed from: A Changed to: X			
03/30/16	owactor	1	ADD VOTER
Changed from: Changed to:			

THIS IS TO CERTIFY THAT
THIS IS A TRUE COPY OF
THE ORIGINAL DOCUMENT


Feb. 20, 2018



Board of Elections in the City of New York

Serial No: 412274628
Name: MCLAURIN, JOSHUA, I
Street: 439 EAST 6 STREET 5F
City/Zip: NEW YORK 10009
DOB: 01/17/88

Status: Inactive As of 05/28/17
ED/AD: 021/74
Enrollment: Democratic
Registration Date: 03/29/16

Voting History:

<u>Election</u>	<u>Type</u>	<u>Ballot</u>	<u>Type</u>	<u>Voter</u>	<u>Type</u>	<u>ED/AD</u>
04/19/16	PP	R		R		021/074

THIS IS TO CERTIFY THAT
THIS IS A TRUE COPY OF
THE ORIGINAL DOCUMENT

[Signature]
Feb. 20, 2018.

EXHIBIT D



OFFICE OF SECRETARY OF STATE

*I, Brian P. Kemp, Secretary of State of the State of Georgia, do
hereby certify that*

the attached 2 pages is a certified copy of Georgia Voter Registration

System records for Joshua Ivan McLaurin as of March 14, 2018.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed
the seal of my office, at the Capitol, in the City of Atlanta, this
14th day of March, in the year of our Lord Two Thousand and
Eighteen and of the Independence of the United States of
America the Two Hundred and Forty-Second.



B. P. Kemp

Brian P. Kemp, Secretary of State

EXHIBIT E

State of Georgia Campaign Contribution Disclosure Report

1. Report Type Original Report	2. Filing is being made on behalf of: Candidate or Public Official C2017000407 - Campaign to Elect Lucy McBath for HD37 Lucia Kay McBath State Representative, District 37	Filing Office Use Only <i>E-Filed on</i> 2/7/18 2:18 pm Use Earlier of Post Mark or Hand Delivered Date
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3. Identifying and Contact Information

- (1) Lucia Kay McBath (2) 02/06/2018
Full Name of Candidate or Non-Candidate Campaign Committee *Today's Date*
- (3) 1860 Sandy Plain Road Suite 204-210 Marietta, GA 30066
Mailing Address
- (4) Telephone number is unavailable.
Contact Phone Number (We will understand the release of this information as permission to call your office if necessary.)
- (5) If a Candidate or Public Official, is there a campaign committee (one or more persons) to make campaign transactions, keep the financial records of the campaign, or file the reports? YES (6) If so, is the Committee registered with the State Ethics Commission? YES
- (7) Chairperson: Rebecca Walldorff Treasurer: Curtis Glen McBath
Name of Chairperson and / or Treasurer of Committee

4. Period for which you are Reporting

My Non Election Year	My Election Year	Run-Offs (Report Require Only if you are in a Run Off Election)	Special Elections (Report Require Only if you are in a Special Election)
☐ January 31, 2018 ☐ June 30, 2018 Supplemental Reporting ☐ June 30, 2018 ☐ December 31, 2018 *Persons leaving office with excess funds until such funds are expended as provided in the Act *Unsuccessful candidates with excess funds, or who receive contributions to retire debt incurred, until such funds are expended, or such unpaid debts are satisfied	☒ January 31, 2018 ☐ March 31, 2018 ☐ June 30, 2018 ☐ September 30, 2018 ☐ October 25, 2018 ☐ December 31, 2018	☐ 6 days before Primary Run-Off, 2018 ☐ 6 days before General Run-Off, 2018 ☐ 6 days before Special Primary Run-Off, 2018 ☐ 6 days before Special Run-Off, 2018	☐ 15 days before Special Primary, 2018 ☐ 15 days before Special, 2018 ☐ Dec. 31, 2018

The electronic filing of this document constitutes an affirmation that the statement is true, complete, and correct. As per modifications of the Ethics in Government Act, filing a separate notarized affidavit is no longer required. See O.C.G.A. §§ 21-5-34.1(e) and 21-5-50(e).

State of Georgia
Campaign Contribution Disclosure Report
Summary Report

CONTRIBUTIONS RECEIVED

1	I Have: The following contributions, including Common Source, to report:	<u>In-Kind</u> <u>Estimated Value</u>	<u>Cash Amount</u>
2	Total contributions previously reported.	\$0.00	\$0.00
3	Total amount of all itemized contributions received in this reporting period which are listed on the "Itemized Contributions" page.	\$14,427.71	\$79,115.26
3a	All loans received this reporting period.		\$0.00
3b	Interest earned on campaign account this reporting period.		\$0.00
3c	Total amount of investments sold this reporting period.		\$0.00
3d	Total amount of cash dividends and interest paid out this reporting period.		\$0.00
4	Total amount of all separate contributions of \$100.00 or less received in this reporting period and not listed on the "Itemized Contributions" page. "Common Source" contributions must be aggregated on the "Itemized Contributions"	\$0.00	\$15,845.54
5	Total contributions reported this reporting period. (Line 3 + 3a + 3b + 3c + 3d + 4)	\$14,427.71	\$94,960.80
6	Total contributions to date. (Line 2 + 5)	\$14,427.71	\$94,960.80

EXPENDITURES MADE

7	I Have: The following expenditures to report:	<u>In-Kind</u> <u>Estimated Value</u>	<u>Cash Amount</u>
8	Total expenditures made and reported prior to this reporting period.	\$0.00	\$0.00
9	Total amount of all itemized expenditures made in this reporting period which are listed on the "Itemized Expenditures" page.	\$0.00	\$20,952.57
10	Total amount of all separate expenditures of \$100.00 or less each that were made in this reporting period and not listed on the "Itemized Expenditures" page.	\$0.00	\$50.00
11	Total expenditures reported this reporting period. (Line 9 + 10)	\$0.00	\$21,002.57
12	Total expenditures to date. (Line 8 + 11)	\$0.00	\$21,002.57

INVESTMENTS

13	Amount of investments at the beginning of this reporting period.		\$0.00
14	Total amount of investments at the close of this reporting period.		\$0.00

15	Net Balance On Hand. (Line 6 - 12 + 14)		\$73,958.23
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State of Georgia
Campaign Contribution Disclosure Report
Outstanding Indebtedness

0 Indebtedness		<u>Amount</u>
1	Outstanding indebtedness at the beginning of this reporting period.	\$0.00
2	Loans received this reporting period.	\$0.00
3	Deferred payments of expenses this reporting period.	\$0.00
4	Payments made on loans this reporting period.	\$0.00
5	Credits received on loans/deferred payments this reporting period.	\$0.00
6	Payments this period on previously deferred expenses.	\$0.00
7	Total indebtedness at the close of this reporting period. (line 1 + 2 + 3 - 4 - 5 - 6)	\$0.00

State of Georgia
Campaign Contribution Disclosure Report
Itemized Contributions

Must list contributions received by a single contributor for which the aggregate total is more than \$100.00

Full Name of Contributor Mailing Address (Affiliation of Committee if any)	Contributor		Election Cycle	Cash Amount	In-Kind Contributions
	Received Date Contribution Type	a. Occupation & b. Employer			Estimated Value Description
Advantage, Aurum 24 Albion Rd Ste 330 Lincoln, RI 02865-3744	10/05/2017 Monetary	a. President b. Aurum Advantage	2018 Primary	\$127.00	\$0.00
Alcorn, Ted 480 Kosciuszko St Brooklyn, NY 11221-5675	10/27/2017 Monetary	a. Strategic Consultant b. Self Employed	2018 Primary	\$100.00	\$0.00
Alison, Townsend 63 Alfred Drown Rd Barrington, RI 02806-1854	01/27/2018 Monetary	a. Homemaker b. Self Employed	2018 Primary	\$1,000.00	\$0.00
American Women's Party Inc 428 -430 E 10TH St New York, NY 10009	11/16/2017 Monetary		2018 Primary	\$1,000.00	\$0.00
Arnold, Celeste D. 12700 Victory Lakes Loop Bristow, VA 20136-1275	08/28/2017 Monetary	a. Education b. PWCS	2018 Primary	\$100.00	\$0.00
Arquero, Melvin 173 Irving Ave Brooklyn, NY 11237-4395	01/24/2018 Monetary	a. Account Manager b. Brandwatch	2018 Primary	\$20.00	\$0.00
Arquero, Melvin 173 Irving Ave Brooklyn, NY 11237-4395	01/30/2018 Monetary	a. Account Manager b. Brandwatch	2018 Primary	\$100.00	\$0.00
Arthur, Ann 152 Gates Ave Brooklyn, NY 11238-1922	01/16/2018 Monetary	a. Physician b. Self Employed	2018 Primary	\$500.00	\$0.00

McDermott, Hugh 4150 Linnean Ave NW Washington, DC 20008-3807	01/23/2018 Monetary	a. Deputy Director b. Everytown for Gun Safety	2018 Primary	\$50.00	\$0.00
McLaurin, Joshua 12175 Brookfield Club Dr Roswell, GA 30075-1263	10/02/2017 Monetary	a. Attorney b. Self Employed	2018 Primary	\$100.00	\$0.00
Meeks, Ebony 5355 Henry Hudson Pkwy W Bronx, NY 10471-2850	01/24/2018 Monetary	a. Deputy Press Secretary b. New York State Assembly	2018 Primary	\$100.00	\$0.00
Mehlenbacher, Kelly 196 Stanton St Apt 4I New York, NY 10002-4099	01/24/2018 Monetary	a. Accounting b. Onward Together	2018 Primary	\$100.00	\$0.00
Mikell, Theadore 950 Forest Overlook Trl SW Atlanta, GA 30331-8307	12/08/2017 Monetary	a. Computer Software Sales b. SAP America Inc.	2018 Primary	\$100.00	\$0.00
Milikowsky, Brina 20 E 9th St # 4X New York, NY 10003-5944	10/03/2017 Monetary	a. Strategic Consultant b. Self Employed	2018 Primary	\$500.00	\$0.00
Miller, Diane 71 Cranberry St Apt 1 Brooklyn, NY 11201-6828	10/15/2017 Monetary	a. Not Employed b. Not Employed	2018 Primary	\$250.00	\$0.00
Mills, Cheryl 1361 Locust Rd NW Washington, DC 20012-1325	01/06/2018 Monetary	a. Executive b. BlackIvy	2018 Primary	\$500.00	\$0.00
Molavi, Marji 1 Main St Apt 5H Brooklyn, NY 11201-1148	11/06/2017 Monetary	a. Not Employed b. Not Employed	2018 Primary	\$25.00	\$0.00
Molavi, Marji 1 Main St Apt 5H Brooklyn, NY 11201-1148	01/02/2018 Monetary	a. Not Employed b. Not Employed	2018 Primary	\$250.00	\$0.00

EXHIBIT F

TIMELINE

March 24, 2016	McLaurin Registers to Vote in New York; No Longer a Resident or Citizen of Georgia
April 19, 2016	McLaurin Votes in New York Election
November 6, 2016	Deadline for 2 Year Georgia Citizenship Requirement
November 8, 2016	McLaurin Votes in Georgia General Election
April 18, 2017	McLaurin Votes in Federal Special Election in Georgia for 6th Congressional District
May 28, 2017	McLaurin becomes Inactive on New York Voter Rolls; residence changed to 12175 Brookfield Drive, Roswell, GA
June 20, 2017	McLaurin Votes in Federal Special Election Runoff using address at 10009 Cicero Drive, Alpharetta, GA
October 2, 2017	McLaurin uses 12175 Brookfield Drive address in Roswell for McBath campaign contribution
November 6, 2017	Deadline for 1 year District Residency Requirement
November 7, 2017	McLaurin Votes in Georgia General Election using 91 Spalding Trl. NE, Sandy Springs, GA address
March 5, 2018	McLaurin files Declaration of Candidacy and Affidavit stating that he resided in Georgia for the past 2 years and in House District 51 for the past 1 year
November 6, 2018	General Election for House District 51