

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

<b>IN THE MATTER OF:</b>	*	<b>CASE NO.</b>
	*	
<b>KEISHA L. BOTTOMS</b>	*	<b>2018-0059</b>
	*	
	*	
	*	

---

**CONSENT ORDER**

This matter comes before the Georgia Government Transparency and Campaign Finance Commission (hereinafter "Commission") pursuant to a complaint filed by Jamie Ensley, on behalf of the Georgia Log Cabin Republicans, on or about June 19, 2018, and a Notice of Additional Allegations from Commission staff dated December 2, 2019. Now, prior to a final hearing on this matter, Respondent Keisha L. Bottoms (hereinafter "Respondent") and the Commission agree to resolve the above-styled matter by Consent Order under the terms and conditions described herein.

**FINDINGS OF FACT**

Respondent is the Mayor for the City of Atlanta, Georgia, who most recently campaigned for said office during the 2017 general election cycle, after the filing of her declaration to intention to accept campaign contributions on October 25, 2016, and her qualification to stand for election to said office.

At the time of the alleged violations, Respondent was a candidate for elected public office, who was required to regularly report the amount(s) and source(s) of her campaign contribution(s), as well as, the end recipient(s) and sum(s) of her campaign expenditures through the filing of campaign contribution disclosure reports (hereinafter "CCDR").

In addition to imposing regular reporting requirements, the Georgia General Assembly has also imposed a maximum limit on the aggregate amount of campaign contributions which a candidate for public office may receive from any single person or entity during an election cycle for use in their campaign for elected office, and Respondent was subject to said limits in 2017. *See* O.C.G.A. § 21-5-41. In the case *sub judice*, the Commission finds that Respondent:

1. Improperly accepted \$6,900.00 in campaign contributions which exceed maximum campaign contribution limits, a violation of O.C.G.A. § 21-5-41(b).
2. Improperly accepted \$110,797.00 in campaign contributions when Respondent failed to elect separate accounting as permitted by O.C.G.A. § 21-5-43(a) and exceeded outstanding debt from the previous election cycle to which the contributions are allocated, a violation of O.C.G.A. §§ 21-5-41(d) and 21-5-43(a).

## CONCLUSIONS OF LAW

The Commission finds that Respondent violated the Georgia Government Transparency and Campaign Finance Act in that Respondent:

1. Improperly accepted \$6,900.00 in campaign contributions which exceed maximum campaign contribution limits, a violation of O.C.G.A. § 21-5-41(b).
2. Improperly accepted \$110,797.00 in campaign contributions when Respondent failed to elect separate accounting as permitted by O.C.G.A. § 21-5-43(a) and exceeded outstanding debt from the previous election cycle to which the contributions are allocated, a violation of O.C.G.A. §§ 21-5-41(d) and 21-5-43(a).

## HOLDING

In resolving this matter, Respondent and the Commission hereby agree to the following:

Respondent will pay a \$37,000.00 civil penalty to the Commission for violation of O.C.G.A. §§ 21-5-41 and 21-5-43.

Respondent further agrees to pay all civil penalties detailed *supra* to the Commission within thirty days (30) from the date of this Order.

Any and all other allegations raised against Respondent are deemed to be unactionable or unfounded or otherwise permissible under the Georgia Government Transparency and Campaign Finance Act.

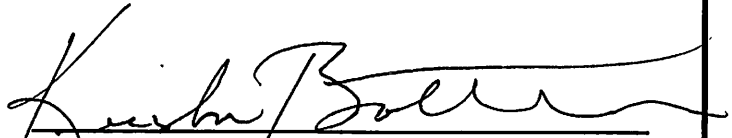
Respondent and the Commission further agree that municipal candidate education with respect to the requirements and prohibitions of Chapter 5 of Title 21, Articles 2 and 2a, of the Official Code of Georgia Annotated, is an appropriate exercise of the powers and duties of the Commission to protect the integrity of the democratic process and to ensure fair elections. Respondent agrees and warrants to assist the Commission in securing a venue with appropriate spacing, and/or capability of audio/visual recording for purposes of electronic distribution, so as to allow the Commission to conduct city-wide training regarding campaign finance accounting, campaign finance regulations, and general campaign finance laws, for all candidates and/or their campaign staff seeking municipal office in the City of Atlanta during the 2021 general election cycle. Said training will be conducted by the Commission's staff and will also be available to any candidate seeking municipal office in the State of Georgia during the 2021 general election cycle. The cost of the training will be the responsibility of the Commission and any costs associated with said training shall be offset, to the extent possible, by the civil penalty assessed herein.

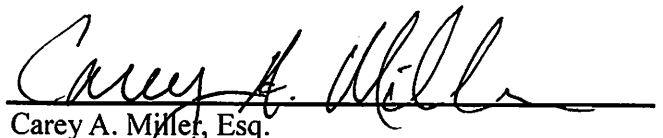
Respondent consents to the foregoing findings of fact and conclusions of law, and further agrees to abide by all terms of this Order. By signing this Order, Respondent waives any right to appeal pursuant to the procedures outlined in the Administrative Procedure Act (APA) as provided by O.C.G.A. § 50-13-1 *et. seq.*

Failure to comply with the terms herein, absent a showing of good faith, will constitute a willful and knowing violation of said terms by Respondent. Respondent's failure to comply with said terms shall

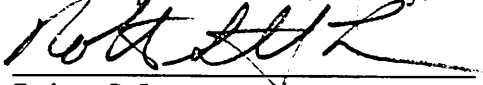
constitute a breach of this agreement and thereby authorize the Commission to seek enforcement and/or collection of this order by subsequent contempt or other proceedings against the Respondent in the Superior Court for the State of Georgia. The parties agree that all costs and attorneys' fees incurred by the Commission in any enforcement action shall be assessed against Respondent pursuant to O.C.G.A. § 21-5-6(b)(14)(C)(iv).

The Commission adopts the foregoing findings of fact and conclusions of law and orders the implementation of the terms of this Consent Order.

  
Keisha L. Bottoms  
Respondent

  
Carey A. Miller, Esq.  
Ga. State Bar No.: 976240  
Attorney for Respondent

Order Prepared and Presented by:

  
Robert S. Lane  
Ga. State Bar No.: 178970  
Deputy Executive Secretary

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

**Georgia Government Transparency and Campaign Finance Commission**  
**BY:**

\_\_\_\_\_  
Jake Evans, Chair