

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
2004 FEB 12 A 11:12

Anderson for US Senate
George Anderson, Candidate
3 Central Plaza, Box 254
Rome, Georgia 30161
706-346-7677
706-232-3753
ganderson@andersonforsenate.org

January 31, 2004

Office of General Counsel
Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463

Re: George Anderson – IDS4GA 11087
Citizens for Anderson – ID C00394320

MUR 5407

To the Federal Election Commission:

I am writing in response to a recent complaint filed against me by Mark W. Wortham, past Secretary-Treasurer of the National Republican Lawyers Association and most recent Associate General Counsel to Cobb County Republican Party. I will address each of the allegations filed against me.

1. Late filing: To the best of my knowledge and belief, I filed the Statement of Candidacy (FEC Form 2) with the Secretary of the U.S. Senate in a timely manner.
2. Missing Pages: In my FEC Statement of Organization Form 1, I only filed a 2 page form. Only after Republican Party operative, Mr. Wortham, pointed out in his Complaint that the form was 4 pages, did I discover the remaining 2 pages. I have filed those additional pages of Friday, January 30th, 2004 to the Office of the Secretary of the Senate sent certified mail. I did not intentionally, file half the form.
3. Form not signed: Republican operative Wortham states that 11C.F.R. 102.2(a) provides that a campaign form 1 must be "signed by the treasurer" of the campaign. I did not "knowingly file the form without any such signature." I had at that time, no campaign contributions, nor expenditures, nor a treasurer to report. On Friday, January 30th, 2004, I mailed in the Amended form with my wife, Marilyn Anderson as the Treasurer. I have also filed and sent certified mail, the campaign contribution (just 1) and the expenditures incurred in 2003.
4. Website not listed: When I filed 11 CFR 102.2(a), I did not have a campaign website secured. I currently do have a campaign website and have listed it on Amended form sent certified mail on Friday, January 30th, 2004. I did not intentionally omit this information.
5. Improper Box checked: Republican Operative Wortham states that I have incorrectly filled out Line 5 of Statement of Organization. Wortham states

24 19 03 01 42

that I have checked off the incorrect box indicating that my campaign committee is a "separate segregated fund". Thanks to Mr. Wortham, who is also an attorney, I've corrected this on my Amended form. I appreciate Mr. Wortham pointing out my errors on my recent filings for United States Senate.

6. Line Not Properly filled Out: I've amended my Form and sent it certified to the Secretary of the Senate on Friday, January 30th, 2004.
7. No Custodian of Records Listed: I've discovered through Mr. Wortham's Complaint the missing 2 pages and have listed Custodian of the Campaign records on the filing that I mailed off on Friday, January 30th, 2004.
8. No Bank Depository Listed: Again, when I discovered the missing 2 pages of FEC's Statement of Organization (Form 1), I have made the appropriate amendments on the form and sent it off Friday, January 30th, 2004.

Mark Wortham needs to be recognized for 2 reasons: 1) His support to the Republican Party to retaliate against me for my many Ethics Complaints against his fellow Republicans; and 2) For his tremendous assistance in showing me the errors of my recent filings for the United States Senate. Mr. Wortham is an attorney and has taken a portion of his personal time to file a complaint against my campaign. His complaint has been noted and my Amendments have been filed accordingly with the Office of the Secretary of the Senate. If not for my belief that Mr. Wortham has filed the Complaint against me to benefit the Republican Party, I would list his assistance as an in-kind contribution to my Campaign.

I request the Commission to investigate Mr. Wortham's Complaint against me. I'm confident the Commission will find that the errors were unintentional and that this Candidate failed to cross t's and dot i's.

Sincerely,



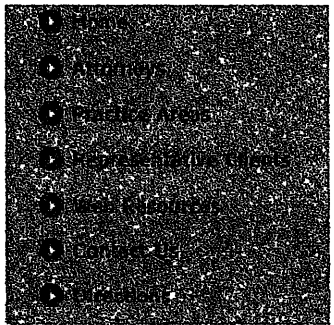
George Anderson
Libertarian Candidate for United States Senate

24-19-025-3547



HICKS, CASEY & BARBER, P.C.

GEORGIA LAW FIRM



ATTORNEYS

Mark W. Wortham

Hicks, Casey & Barber, P.C.
Suite 100
136 North Fairground St. NE
Marietta, GA 30060-1977

Communication Center

Phone: (770) 428-1000 **E-mail:** mark.wortham@hickscasey.com
(888) 293-3998

Fax: (770) 428-3637 **Web site:** <http://www.hickscasey.com>

| | | |
|--|--|-------------------------------------|
| <u>Areas of Practice</u> | <u>Bar Admissions</u> | <u>Education</u> |
| <u>Honors</u> | <u>Published Works</u> | <u>Affiliations</u> |

Mark has specialized in the areas of general liability and workers' compensation since his admission to the Bar. He has also engaged in a wide variety of litigation including automobile and premises liability, class action defense, construction defects, products liability and insurance coverage.

Areas Of Practice:

- General Liability
- Workers' Compensation
- Litigation
- Automobile and Premises Liability
- Class Action Defense
- Construction Defects
- Products Liability
- Insurance Coverage

Bar Admissions:

Georgia, 1986

8458-528-61-42
24-19-025-3548

Education:

Georgia State University College of Law, Atlanta, Georgia, 1986
J.D.

Augusta College, 1983
B.A.

Published Works:

*Editorial Board and Contributor, Atlanta Bar Association
Newsletter, 1995-1997*

Classes/Seminars Taught:

"The Layman's Lawyer," Production Committee, Georgia PBS
Television, 1997 - 1998

Honors and Awards:

Life Member, The National Registry of Who's Who

Life Member, The National Registry of Who's Who in American
Law

Professional Associations and Memberships:

Atlanta Bar Association, Litigation Section
Member

Atlanta Bar Association, Workers' Compensation Section
Member

American Bar Association, Litigation Section
Member

American Bar Association
Member, Class Action Subcommittee

American Bar Association
Member, Derivative Lawsuit Subcommittee

American Bar Association
Member, Insurance Coverage Subcommittee

Defense Research Institute
Member, Products Liability Committee

Federal Bar Association
Member, Civil Procedure Committee

Cobb County Bar Association
Member

Georgia State House of Representatives, District 39, 1998 -
2002

24-19-025-3549

Member

National Republican Lawyers Association, Atlanta Chapter, 2002
- Present
Secretary-Treasurer

Cobb County Republican Party, 2001 - 2003
Associate General Counsel

State Bar of Georgia, 1999 - Present
Fee Arbitrator

Past Employment Positions:

Superior Court Judges, Augusta Judicial Circuit, Law Clerk

Birth Information:

1961, Augusta, Georgia

Home : Attorneys : Practice Areas : Representative Clients : Web Resources : Contact Us : Directions

Copyright © 2003 by Hicks, Casey & Barber, P. C. All rights reserved. You may reproduce materials available at this site for your own personal use and for non-commercial distribution. All copies must include this copyright statement.

24.19.025.3550