

**COMPLAINT BEFORE THE FEDERAL ELECTION COMMISSION**

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
GENERAL  
COUNCIL

2000 NOV 31 A 10: 58

In the matter of:      Honeycutt for Congress  
                             Scott Mackenzis, Treasurer

and

Democrats for Good Government  
David Knox, Principal

MUR #

6138

**COMPLAINT**

COMES NOW the David Scott for Congress, a campaign committee registered with the Federal Election Commission ("FEC"), complainant herein, files this Complaint against Honeycutt for Congress and Democrats for Good Government for direct and serious violations of the Federal Election Campaign Act ("FECA"), showing the Federal Elections Commission as follows:

**Complainant**

1.

Complainant, David Scott for Congress is a campaign committee registered with the FEC for the purpose of supporting the election of David Albert Scott to the United States House of Representatives. David Albert Scott is currently the U.S. Representative representing the 13<sup>th</sup> Congressional District of Georgia. The address for David Scott for Congress is P.O. Box 960821, Riverdale, Georgia, 30296. Michael Williams is the attorney-in-fact to David Scott for Congress, having an address of 2262 Mount Zion Road, Jonesboro, Georgia, 30236.

### **Respondents.**

2.

Deborah T. Honeycutt is a candidate for the United States House of Representatives, seeking to become the U.S. Representative for the 13<sup>th</sup> Congressional District of Georgia. Andrew Honeycutt is the spouse of Deborah T. Honeycutt as is described as the "campaign executive" for Honeycutt for Congress. Honeycutt for Congress is the principal campaign committee for Deborah T. Honeycutt. Scott Mackenzie is the current treasurer for Honeycutt for Congress and served as treasurer at the time the events described in this complaint.

3.

Democrats for Good Government is an unregistered political committee based in Clayton County, Georgia which opposes the candidacy of David Albert Scott. On information and belief, David Knox is the principal for Democrats for Good Government.

### **Factual Allegations**

4.

On or about August 26, 2008, an invoice in the amount of \$1,385.75 (the "Invoice") was billed by 48HourPrint.com (the "Vendor") to a person identified as "Andrew" at the address of 160 Deer Forest Trail, Fayetteville, Georgia 30214. The Invoice is attached as Exhibit A.

5.

On information and belief, Deborah Honeycutt and Andrew Honeycutt are the owners of the property with the address of 160 Deer Forest Trail, Fayetteville, Georgia

30214. This address is listed as the personal address for Deborah Honeycutt on the October Quarterly disclosure filed with the FEC on October 15, 2008.

6.

The Invoice identifies a job for 25,000 3.5 by 8.5 inch "rack cards" entitled "Corrupt" to be shipped to David Knox at 118 North Avenue, Suite A, Jonesboro, Georgia, 30236.

7.

On information and belief, Honeycutt for Congress maintains its campaign headquarters at 118 North Avenue, Suite A, Jonesboro, Georgia, 30236.

8.

The "rack card" entitled "Corrupt," attached as Exhibit B (hereinafter, the "Communication"), indicates that it was paid for by DemocratsforGoodGovernment.com. No where on the card is it indicated that it was paid for or approved by Honeycutt for Congress or Deborah Honeycutt.

9.

The message of the Communication is clearly intended to influence the outcome of the election. It refers readers to a website titled "VoteOutDavidScott.com."

10.

The Communication also contains a depiction of the logo of the Democratic Party, the red, white and blue donkey.

11.

Democrats for Good Government is also listed as the sponsor of other campaign literature including the piece attached as Exhibit C (hereinafter, the "Additional Piece"), which clearly urges readers to vote against David Scott.

**COUNT ONE – Failure to Identify Funding and Authorization Sources**

12.

The Communication clearly fails to state that it was paid for by Honeycutt for Congress or Andrew Honeycutt, its agent as required by 2 U.S.C. § 441d(a)(1) and/or 2 U.S.C. § 441d(a)(2).

13.

To the extent it was not authorized by any political candidate, particularly Deborah Honeycutt, the Additional Piece fails to include the disclosures required by 2 U.S.C. § 441d(a)(3).

**COUNT TWO – Failure to Disclosure Campaign Expenditure**

14.

Honeycutt for Congress failed to disclose the \$1,385.75 expenditure made to Vendor for the Communication on its October Quarterly disclosure filed with the FEC on October 15, 2008 as required by 2 U.S.C. § 434.

**COUNT THREE – Failure to Register as Political Committee**

15.

Democrats for Good Government is a political committee within the meaning of 2 U.S.C. § 431(4)(A) in that it has, on information and belief, received contributions and

made expenditures in excess of \$1,000 in calendar year 2008. However, Democrats for Good Government has failed to register with the FEC as required pursuant to 2 U.S.C. § 433 and related FEC regulations.

#### **COUNT FOUR – Fraudulent Misrepresentation**

16.

Inasmuch as Andrew Honeycutt, acting on behalf of Honeycutt for Congress, and David Knox, acting on behalf of Democrats for Good Government, included a depiction very similar to the logo of the Democratic Party on the Communication, each has, along with Honeycutt for Congress violated 2 U.S.C. § 441(h) in that they have misrepresented themselves as speaking on behalf of the Democratic Party.

#### **Conclusion**

Respondents have engaged in a conspiracy to mislead the voters of the 13<sup>th</sup> Congressional District of Georgia by suggesting that the Democratic Party opposes the candidacy of David Scott. This was accomplished by violating numerous provisions of the FECA as shown herein, the purpose of which was to prevent misrepresentations of the kind perpetrated by the Respondents.

WHEREFORE, Complainant respectfully requests:

1. that the Federal Election Commission conduct an investigation of these allegations;
2. that the Federal Election Commission declare the Respondents to have violated the Federal Election Campaign Act and applicable FEC regulations;
3. that the Federal Election Commission impose sanctions appropriate to these violations; and

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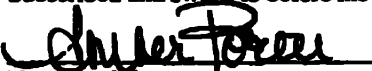
4. that the Federal Election Commission take such further action as may be appropriate including the referral of such matters herein as may be applicable to the Department of Justice for criminal prosecution.

This 25<sup>th</sup> day of November, 2008.



Kwame Vidal  
Campaign Manager  
David Scott for Congress

Subscribed and sworn to before me on this 25<sup>th</sup> day of November, 2008.



Notary Public

My Comm.





11044304261

# CORRUPT DAVID SCOTT



David Scott is  
**CORRUPT!!!**

reports

**Atlanta Journal Constitution  
DC Citizens Watch Group  
and  
Clayton County  
Democrat Organization**

[www.beyonddelay.org](http://www.beyonddelay.org)  
[www.voteoutdavidscott.com](http://www.voteoutdavidscott.com)

 **Your Vote Counts for Change!**  
**VoteOutDavidScott.com**  
Paid for by: [DemocratsForGoodGovernment.com](http://DemocratsForGoodGovernment.com)

## SCOTT'S Re-election Strategy The Worst Black Congressperson



Rep. David Scott of GA District 13

1. Use endorsements from "Civil Rights Leaders" who have sold their souls for the money.
2. Direct voters attention to him in order to maintain current leaders power at the expense of loyal black democratic voters.

One supporter stated "and Remind the Voters, Scott is a Democrat and Glenn Honeycutt for publicizing the Corruption Scandal. Most Democratic voters will not check Scott's congressional record."

**Your Vote Counts for Change!**  
**Out**

Paid for by: Democrats For Good Government.com



**Representative Scott's records indicate he cares more about his wealth and comfort than about education, employment and health needs of the citizens of Clayton, Cobb, Dekalb, Douglas, Henry, and South Fulton Counties.**

**Check his record and  
Vote Him Out**

**[http://www.beyonddelay.org/  
node/317](http://www.beyonddelay.org/node/317)**

**[http://www.goodwillhinton.com/  
rep\\_david\\_scott/financial  
\\_shenanigans](http://www.goodwillhinton.com/rep_david_scott/financial_shenanigans)**

**[http://www.citizensofconathics.org/  
node/30146](http://www.citizensofconathics.org/node/30146)**



## **WHY**

- Listed as a Corrupt Congressman**
- Tax Evasion**
  - 40 tax liens**
  - \$150,000 IRS Lien**
- Misuse of Official Resources**
- Violation of Federal and State Tax Laws**
- For Illegal Amnesty**
- Funneled \$715,330.17 to family from campaign**
- Under Federal Investigation**

