Before the Gwinnett Ethics Board
State of Georgia

Complaint against Commissioner Tommy Hunter

RECEIVED
Tommy Hunter
FEB 6 2017
Service copy
LAW DEPT.

1. Name and address of person filing the complaint.

Nancie Turner
2950 Mt Wilkinson Parkway
Unit 410
Atlanta, GA 30339

2. Name and address of the party against whom the complaint is filed.

Gwinnett County Commissioner Tommy Hunter
75 Langley Drive
Lawrenceville GA 30046

3. Statement of the facts upon which the complaint is based along with an allegation that such facts constitute one or more violations of the Gwinnett Ethics Code.

On Saturday January 14th, Gwinnett County Commissioner Tommy Hunter posted on his Facebook page that Civil Rights icon and Georgia Congressman John Lewis was a "racist pig." The same post went on to call Democrats "DemonRats" and refer to them as "a bunch of idiots."

When people took offense to his Facebook posts, Mr. Hunter posted a meme to his FB page which stated "If you're easily offended and looking for a 'safe place' my page ain't it.. Move along snowflake."

I was surprised that a public official would post such unprofessional and inappropriate posts on his Facebook page, so I began scrolling through his page, which appeared to be public at that time. In addition to the January 14th post, I saw a post on Mr. Hunter's Facebook page from December 1, 2016

ATTACHMENT A

where he indicated that he thought Trump should reach out to Jill Stein and appoint "her Ambassador to Syria or Afghanistan or somewhere like that." I also saw a post on Mr. Hunter's Facebook page where he referred to himself as an angry white man. And I saw numerous posts on Mr. Hunter's page where he referred to Democrats as "DemonRats" and "Libtards."

Before deactivating his Facebook page, Mr. Hunter made additional Facebook posts about Congressman Lewis, calling his election wins "all illegitimate."

Mr. Hunter's comments regarding Congressman John Lewis, Jill Stein and Democrats violate several provisions of the Gwinnett County Code of Ethics. In particular, Mr. Hunter has violated Section 60-26.5 (b), Section 60-26.5 (k), and Section 60-26.5 (p).

4. General reference to applicable Gwinnett Ethics Code.

In pertinent part, Section 60-26.5 (b) of the Code of Ordinances of Gwinnett County provides that all county commissioners shall "[p]ut loyalty to the highest moral principles and to County above loyalty to ... party..."

In pertinent part, Section 60-26.5 (k) of the Code of Ordinances of Gwinnett County provides that all county commissioners shall "[n]ever engage in conduct which is unbecoming to a member or which constitutes a breach of public trust."

In pertinent part, Section 60-26.5 (p) of the Code of Ordinances of Gwinnett County provides that all county commissioners shall "[u]phold these principles, ever conscious that public office is a public trust and is an honor, not a right."

5. General reference to applicable Georgia law.

Complainant refers the members of the Gwinnett County Ethics Board to the Official Code of Georgia Annotated (O.C.G.A.)§ 45-11-4. In pertinent part O.C.G.A. § 45-11-4 prohibits a public officer from committing "malpractice, misfeasance, or malfeasance in office". Mr. Hunter's improper, unprofessional conduct that violates the Gwinnett County Code of Conduct requires that this matter be referred to the Gwinnett County Solicitor General to determine whether a formal, criminal accusation against Mr. Hunter should be drawn.

6. Any further information supporting the allegations in the complaint, including the names and addresses of all persons with firsthand knowledge of the facts in the complaint and any documentary evidence supporting the complaint.

Attached please find:

Exhibit A. Facebook post of Commissioner Hunter.

Exhibit B. Facebook post of Commissioner Hunter.

Exhibit C. Facebook post of Commissioner Hunter.

Exhibit D. Facebook post of Commissioner Hunter.

Exhibit E. Facebook post of Commissioner Hunter.

Exhibit F. Facebook post of Commissioner Hunter.

Exhibit G. Letter from Chairwoman Charlotte Nash to Congressman John Lewis.

In addition to receiving testimony from the Complainant, the Board should receive evidence and testimony from Commissioner Tommy Hunter 75 Langley Drive Lawrenceville GA 30046 and Chairwoman Charlotte Nash 75 Langley Drive Lawrenceville GA 30046.

7. Sworn verification and signature of the complainant.

I solemnly swear, under penalty of perjury, that the information provided by me in this complaint is true and accurate to the best of my knowledge and that I am competent to testify in the matter set forth herein.

This 3 day of February, 2017.

Nancie Turner

Sworn to and subscribed before
Me, a notary public in the State
of Georgia, this 3 day of February,
2017.

CYNTHIA STIRNE NOTARY PUBLIC DEKALB COUNTY, GEORGIA MY COMMISSION EXPIRES MAY 02, 2020

05-02-2020

8. Certificate of Service

This is to certify that we have this day served a copy of the foregoing Complaint on the Gwinnett County Law Department, William J. Linkous III via hand delivery at 75 Langley Drive, Lawrenceville GA 30046 and on Commissioner Tommy Hunter via hand delivery to 75 Langley Drive Lawrenceville GA 30046 and via United States Mail with sufficient postage attached thereto to: Tommy Hunter Gwinnett County Commissioner 75 Langley Drive Lawrenceville GA 30046.

This 10 day of February, 2017.

261 West Crogan Street
Lawrenceville, Georgia 30046
(770) 513-0113

Christine A. Koehler
Attorney for Complainant
Georgia State Bar No. 427618

3902 Centre Court
Norcross, Georgia 30092
(404) 232-5219

Helen Kim Ho
Attorney for Complainant
Georgia State Bar No. 121781

John Lewis is a racist pig. There ain't one political pundit that didn't say on November 9 that this would be Demonrats EXACT response to Trump winning. Like I heard Rush, I believe say, Demonrats DO NOT live in reality. They believe polls were right and THE REAL VOTES were wrong. What a bunch of idiots.

EXHIBIT A

Tommy Hunter shared What Guys Like's photo.

Yesterday at 2:50 PM

What Guys Like

Friday at 9:00 AM

EXHIBIT B

Tommy Hunter

December 1 ·

If I were Trump I would reach out to Jill Stein by appointing her Ambassador to Syria or Afghanistan or somewhere like that.

14 21 Comments

Like Comment Share

EXHIBIT C

Tommy Hunter

December 11, 2016 at [illegible]

You dang skippy Billy boy and I AM one of them.

Bill Clinton bashes Trump, blames 'angry white men' and Comey for wife's loss

Former President Bill Clinton mocked President-elect Donald Trump's intelligence, said "angry white men" helped secure his victory and blamed FBI Director James Comey...

FOXNEWS.CO

Like Share

17

EXHIBIT D

So now "sniffles" are a campaign issue?

Like Comment Share

Tommy Hunter

Interesting headline on Fox's website: "Online polls declare Trump debate winner, despite media consensus for Clinton". I, for one, am surprised as the libtard always seems to get more votes, but I think this is one the media elite are really missing.

Like Comment Share

Tommy Hunter

EXHIBIT E

Tommy Hunter

John Lewis' district is drawn to keep him in power. His wins are all illegitimate. How can other reps be concerned about working with him.

EXHIBIT F

Board of Commissioners

75 Langley Drive • Lawrenceville, GA 30046-6935
770.822.7000 • www.gwinnettcounty.com

Charlotte J. Nash, Chairman
Jace W. Brooks, District 1
Lynette Howard, District 2
Tommy Hunter, District 3
John Heard, District 4

gwinnettcounty

January 17, 2017

Honorable John Lewis
100 Peachtree Street
Suite 1920
Atlanta, GA 30303

Dear Congressman John Lewis:

I am writing you today to offer my sincere apologies and regrets for the disrespectful comments about you posted on social media by a Gwinnett district commissioner. I would further welcome the chance to apologize to you face-to-face if you are willing to give me a few minutes to do so.

I want to assure you that the remarks posted by one commission do not reflect the opinions of the Board of Commissioners as a whole nor do we condone the use of social media to spread negative thoughts about any individual. We understand that our communications carry the weight of our offices and try to manage ourselves accordingly.

Further, the comments expressed by one individual do not reflect the opinions of Gwinnett County residents as a whole. Most of us honor you as a leader in the civil rights movement and as a long-time public servant, even those who may hold different political stances.

I hope that it is still possible to disagree in in a respectful, civil manner without being offensive and without compromising our ability to take principled stands. However, using hurtful words and name-calling should not have a place in governing.

Again, I sincerely apologize and ask for the chance to repeat this apology to you in a face-to-face meeting.

With best regards,

Charlotte J. Nash

Charlotte J. Nash
Chairman, Gwinnett County Board of Commissioners

EXHIBIT G

JARRARD & DAVIS, LLP

KEN E. JARRARD*
ANGELA E. DAVIS
CHRISTOPHER J. HAMILTON
MEGAN N. MARTIN

PAUL B. FRICKEY
KENNETH P. ROBIN
SARAH VANVOLKENBURGH†

Limited Liability Partnership
105 Pilgrim Village Drive, Suite 200
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KJARRARD@JARRARD-DAVIS.COM

* Also Admitted in Tennessee
† Also Admitted in Illinois and California
◊ Also Admitted in Wisconsin

G. AARON MEYER
JESSE A. VAN SANT
MOLLY N. ESSWEIN
SAM P. VANVOLKENBURGH ◊
JEFFREY M. STRICKLAND
J. PAUL MITCHELL
KAYLA F. VAN OOSTERWYK

February 13, 2017

VIA EMAIL & OVERNIGHT DELIVERY

William Linkous, Esq.
County Attorney
Gwinnett County Department of Law
75 Langley Drive
Lawrenceville, Georgia 30046

Dear Mr. Linkous,

As the designated Hearing Officer[1], I have reviewed the complaint filed by Nancie Turner (the "Complaint") against Commissioner Tommy Hunter for the limited purpose of determining whether the Complaint meets the technical requirements of the Gwinnett County Code of Ethics. Based upon my review, I have concluded that the Complaint meets the technical requirements set forth in § 60-37(a)(1) and (2). I have made no determinations, however, regarding the merits of the Complaint or whether the facts alleged are true or are sufficient to state a claim of unethical conduct – as such would be outside the confines of the Hearing Officer's role. In accordance with § 60-37(a)(4), I am forwarding the Complaint to you for further action. Please allow me to detail my analysis.

Technical requirements of § 60-37(a)(1) and (2)

Pursuant to the Gwinnett County Code of Ethics, an ethics complaint must:

1. Be in writing;
2. Be verified;
3. Be sworn under the penalty of perjury or false swearing;
4. Be submitted to the county attorney;

[1] See Gwinnett County Code of Ethics § 60-37(a)(3), which sets forth the Hearing Officer's limited duty to review ethics complaints to determine whether the technical requirements are met.

ATTACHMENT B

5. Specifically identify all provisions of the Gwinnett County Code of Ethics which the subject of the complaint is alleged to have violated;
6. Set forth facts as would be admissible in evidence in an administrative proceeding;
7. Show affirmatively that the complainant or affiant (if in addition to or different than the complainant) is competent to testify to the matter set forth therein;
8. Have all documents referenced in the complaint as well as supporting affidavits attached to the complaint,
9. Be filed within six months from the date of the alleged violation occurred, or in the case of concealment or nondisclosure, within six months from the date the alleged violation should have been discovered after due diligence, and
10. Not be filed against a candidate between the qualifying date for election of such candidate and the date of the candidate's general election or runoff election, if necessary.

Analysis of Nancie Turner's Complaint against Commissioner Tommy Hunter

1. The Complaint is in writing.

2. Ms. Turner's Complaint is verified. See Complaint at ¶ 7.

3. The Complaint is sworn under the penalty of perjury or false swearing. See Complaint at ¶ 7.

4. The Complaint was submitted to the county attorney. The front page of her complaint is stamped:

   RECEIVED
   County Attorney
   FEB 6 2017
   Service Copy
   LAW DEPT.

5. The Complaint specifically identifies all of the provisions of the Gwinnett County Code of Ethics that Commissioner Hunter is alleged to have violated. Ms. Turner has alleged that Commissioner Hunter violated Code of Ethics §§ 60-26.5(b), (k) and (p). See Complaint at ¶¶ 3, 4.

6. The Complaint sets forth facts *as would be admissible in evidence* in an administrative proceeding. Although the phrase "as would be admissible" is somewhat ambiguous,[2]

[2] While this threshold requirement is quite common in local ethics' codes, the actual application of the "would be admissible" standard is less than clear. Does this mean, for instance, that the complaint itself must set forth the evidentiary foundation for every document or statement attached to the complaint? Or, does it mean merely that some or all of the identified evidence *would be* admissible if an appropriate foundation were established at the hearing? I believe the

the Hearing Officer determines that an interpretation of this phrase that advances transparency in government, a citizen-oriented grievance process, and a full vetting of citizens' complaints should be undertaken. Moreover, Section 60-26.55(a) of the Code of Ethics requires that the Ordinance "be construed broadly to effectuate its purposes and policies."

Consistent with the above, Ms. Turner has set forth facts which may be admissible regarding her own viewing of Commissioner Hunter's purported Facebook posts. Complaint at ¶ 3. Ms. Hunter also includes Commissioner Hunter's purported Facebook posts. See id. and Exhibits "A", "B", "C", "D", "E" and "F". Although the posts and printouts themselves may not be admissible in their present form, the Facebook posts may establish facts "as would be" admissible in evidence upon laying the proper foundation and proper authentication. See In re L.P., 324 Ga. App. 78, 81–82 (2013) (holding that printouts from a website like Facebook are subject to the same rules of authentication as other documents and may be authenticated through circumstantial evidence to show that the posts were made by a particular person).

7. Ms. Turner shows affirmatively that she is competent to testify to the matter set forth in her complaint. See Complaint at ¶ 7.

8. Ms. Turner attaches the documents referenced in her complaint. See Complaint at ¶ 6 and Exhibits A-G.

9. Ms. Turner filed her complaint within six months from the dates of the alleged violations. Ms. Turner filed her complaint on February 6, 2017, less than six months after the Facebook posts were purportedly made on which Ms. Turner has based her allegations.

10. Ms. Turner did not file her complaint between the date of Commissioner Hunter qualifying for election and the date of Commissioner Hunter's general election.

Based upon the above, I believe the Complaint meets the technical requirements set forth in §60-37(a)(1) and (2). Please let me know if you have any questions. Otherwise, this correspondence will conclude the Hearing Officer's service in this matter.

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better interpretation is the latter, more liberal standard. This is particularly so given that often the individuals initiating an ethics complaint are lay citizens, and requiring that lay citizens strictly adhere to the rules of evidence at the pleading stage would defeat or at least imperil the very public policy objectives being pursued by the local government in enacting an administrative review process for alleged ethics violations.

Kindest regards.

Sincerely,

JARRARD & DAVIS, LLP

Ken E. Jarrard

KEJ/mb

Department of Law

75 Langley Drive • Lawrenceville, GA 30046-6935
(tel) 770.822.8700 • (fax) 770.822.8790
www.gwinnettcounty.com

gwinnettcounty

March 30, 2017

R. Read Gignilliat, Esq.
Elarbee, Thompson, Sapp & Wilson LLP
800 International Tower
229 Peachtree Street, NE
Atlanta, Georgia 30303

Re: Gwinnett County Ethics Board

Dear Read:

It has come to my attention that Commissioner Hunter has decided not to appoint a member to the Ethics Board.

Sincerely,

William J. Linkous, III
County Attorney

ATTACHMENT A

ATTACHMENT C

GWINNETT COUNTY ETHICS BOARD

TO: Tommy Hunter
Commissioner, District 3
Gwinnett County
75 Langley Drive
Lawrenceville, GA 30046

NOTICE OF RIGHT TO REPLY TO ETHICS COMPLAINT

WHEREAS, a complaint was filed against you on February 6, 2017, pursuant to Section 54-37(a) of the Gwinnett County Code of Ethics by Nancie Turner, 2950 Mt. Wilkinson Pkwy., Unit 410, Atlanta, GA, 30339; and

WHEREAS, the complaint was deemed compliant with the technical requirements of the Gwinnett County Code of Ethics on February 13, 2017; and

WHEREAS, a copy of the complaint was forwarded to you on February 17, 2017; and

WHEREAS, the Gwinnett County Ethics Board was duly empaneled and held its organizational meeting on March 31, 2017;

PLEASE TAKE NOTICE that you have the right to reply to the aforementioned complaint. Such reply should be in writing and filed with the Ethics Board, care of Julie Mims, Legal Manager, Gwinnett County Department of Law, 75 Langley Drive, Lawrenceville, GA, 30046, within thirty (30) days of this date, unless such time is extended by the Ethics Board upon a showing of good cause. Upon receipt of such reply, the Ethics Board shall promptly forward a copy of same to the above-named complainant.

GWINNETT COUNTY ETHICS BOARD

Dated: March 31, 2017 BY: _____
Chairperson

CC: Christine A. Koehler
Counsel for Complainant

ATTACHMENT B

ATTACHMENT D

GWINNETT COUNTY ETHICS BOARD
PROCEDURAL RULES

Pursuant to Section 54-37(a)(6) of the Code of Ethics, the following procedural rules will govern proceedings before the Gwinnett County Ethics Board empaneled on March 31, 2017.

1. Appointed Administrative Aide to Serve as Clerk to the Ethics Board.

a. The administrative employee appointed by the County Attorney pursuant to Section 54-37(d)(4) of the Code of Ethics will assist the Chairman and the Ethics Board in the capacity as a de facto Clerk to the Ethics Board.

b. The Clerk will assist in the preparation and timely publishing of notices and agendas of all meetings, assist in the recording of the minutes of all meetings, and ensure the timely posting of such minutes, both unofficial and regular, all in accordance with O.C.G.A. § 50-14-1, et seq.

c. The Clerk will facilitate the scheduling of all meetings of the Ethics Board, including ensuring the availability of a suitable meeting room, A/V equipment, and a court reporter or other necessary personnel.

d. Any Open Records Act request and other written communication relating to proceedings before the Ethics Board, including any request for issuance of a subpoena, proof of service of a subpoena, witness and exhibit lists, objections, motions, request for a continuance or extension of a deadline, or notice of appearance or withdrawal shall be submitted or copied to the Clerk.

2. Evidentiary Rulings: Delegation of Authority to Chairman.

a. To facilitate efficient and orderly proceedings, the Chairman is authorized to make initial rulings regarding evidentiary matters, including rulings regarding admissibility and such issues as the scope, relevance, or duration of testimony or proposed testimony. The Chairman may issue such rulings on his own initiative or in response to an objection, request, or motion by a party to the proceedings and, in so doing, may make reasonable inquiries or request offers of proof.

b. All requests for issuance of subpoenas pursuant to Section 54-37(b)(2) of the Code of Ethics shall be directed to the Chairman within the time period established by these procedural rules. The Chairman is authorized to make initial

ATTACHMENT C

ATTACHMENT E

rulings on such requests. It is the responsibility of the requesting party to ensure the proper service of any subpoena issued pursuant to this rule and to promptly submit proof of service.

c. Notwithstanding the foregoing, any member of the Ethics Board may request further discussion of an initial evidentiary ruling made by the Chairman and any such ruling thereafter may be reversed or modified by the Chairman or by majority vote of the Board.

d. In addition to the facilitation of efficiency and order, initial rulings will be based on general evidentiary principles common to administrative proceedings of this nature with particular consideration given to the specific factual allegations of the complaint, the specific violations alleged, and the Ethics Board's status as an investigative body.

3. Pre-Hearing Conference.

To facilitate an efficient and orderly evidentiary hearing, the Chairman may schedule a meeting of the Ethics Board to precede the hearing and serve as a pre-hearing conference for addressing any evidentiary, procedural, or other issues deemed advisable to resolve in advance of the hearing.

4. Witness Lists and Exhibit Lists; Subpoenas; Motions.

a. No later than seven calendar days prior to the pre-hearing conference or, if no pre-hearing conference is held, no later than seven calendar days prior to the evidentiary hearing, the parties shall identify, in writing, all witnesses, exhibits, or other evidence they intend to call or introduce at the hearing. In so doing, the parties shall succinctly describe the anticipated testimony of each witness and, unless otherwise apparent, the element of proof addressed by each exhibit or other item of evidence.

b. Requests for subpoenas should be submitted within the time set forth in sub-paragraph (a) of this rule.

c. Absent good cause, no witness may testify and no exhibit or other evidence may be introduced at the evidentiary hearing, and no subpoena will be issued, unless timely identified or requested in accordance with this rule. The

determination of whether good cause has been shown shall be regarded as an initial evidentiary ruling under Rule 2.

d. No later than three calendar days prior to the pre-hearing conference or, if no pre-hearing conference is held, no later than three calendar days prior to the evidentiary hearing, the parties shall submit any objections they may have to any witness, exhibit, or other evidence identified or any subpoena requested as provided in sub-paragraph (a) of this rule.

e. Any motion relating to the evidentiary hearing should be submitted within the time set forth in sub-paragraph (a) of this rule to the extent the need for the motion can be reasonably anticipated by the moving party. The response to any such motion should be submitted within the time set forth in sub-paragraph (d) of this rule.

5. Court Reporter.

The evidentiary hearing conducted by the Ethics Board will be recorded by a duly licensed/certified court reporter who will prepare a transcript thereof. Unless otherwise directed by the Chairman or by majority vote of the Ethics Board, a court reporter will similarly be retained for any other meeting of the Ethics Board; provided, however, that no transcript of any such meeting will be prepared unless expressly directed by the Chairman or by majority vote of the Ethics Board.

6. Continuances and Extensions.

The Chairman may grant a written request for a continuance of a scheduled meeting or hearing or the extension of a deadline established by these rules for good cause.

7. Witness Testimony.

All witnesses presenting testimony at the evidentiary hearing shall first be placed under oath or affirmation substantially as follows: "Do you solemnly swear or affirm that the testimony you are about to give is the truth, the whole truth and nothing but the truth?"

8. Opening Statements; Closing Arguments; Time Limits.

a. The Ethics Board retains the sole discretion whether to require or allow opening statements and/or closing arguments at the evidentiary hearing, including whether to require or allow post-hearing briefs and/or proposed findings and conclusions in lieu of or in addition to closing arguments.

b. The Ethics Board retains sole discretion to set reasonable time limits on opening statements (if any), closing arguments (if any), witness testimony, and the overall presentation of each party's case. In exercising its discretion in this regard, the Ethics Board will give due consideration to providing each party with a fair and reasonable opportunity to present their respective cases, as well as the facilitation of efficiency and order and the investigative purpose of the hearing.

9. Legal Counsel.

a. All parties may be represented by legal counsel at their own expense; however, no attorney may actively participate in the evidentiary hearing on behalf of a party unless first submitting a written notice of appearance at least twenty-four hours in advance of the hearing.

b. Should it become necessary for an attorney to withdraw from representation of a party, written notice of withdrawal should be submitted as soon as possible. It is the party's responsibility to ensure that timely notice of withdrawal is submitted, and the failure to do so may result in the denial of any request for continuance, extension, or other relief.

10. Miscellaneous.

a. Ex parte communications with the members of the Ethics Board are prohibited.

b. In presiding over any meeting or hearing of the Ethics Board, the Chairman shall preserve order and decorum and, if necessary, shall take any lawful steps he reasonably deems warranted or appropriate to resolve any disruption, interference, or other factor impeding the purpose or undermining the integrity of the proceedings.

c. Should the Chairman be absent from any meeting or hearing of the Ethics Board, and assuming the presence of a quorum, the Vice Chairman shall have all authority and discretion placed in the Chairman by these rules and by the Code of Ethics.

11. Amendment of Procedural Rules.

These rules may be amended, rescinded, or otherwise modified by majority vote of the Ethics Board within their sole discretion.

12. Rescission of Procedural Rules.

These rules shall be deemed rescinded upon expiration of the Ethics Board's service pursuant to Section 54-37(d)(3) of the Code of Ethics.

GWINNETT COUNTY ETHICS BOARD

Dated: May 12, 2017. BY: _____
Chairman

GWINNETT COUNTY BOARD OF ETHICS

STATE OF GEORGIA

NANCIE TURNER and GWINNETT COUNTY BOARD OF ETHICS Petitioner,	:	
V.	:	CASE NO.:_____
COMMISSIONER, TOMMY HUNTER Respondent.	:	

REQUEST FOR CONTINUANCE

Comes Now the undersigned Attorney for the Respondent, Commissioner Tommy Hunter, and requests a Continuance of the May 31, 2017 hearing, scheduled at 9:30 a.m., and for the following reasons:

(1)

Counsel was retained at 1:00p.m. on May 30, 2017 and needs time to review the pending allegations and prepare a defense.

(2)

Upon information and belief this is the first request for continuance by any counsel for the Respondent.

(3)

ATTACHMENT D

ATTACHMENT F

Respondent has retained counsel to effectively represent and defend him and a continuance serves the best interest of justice and confidence in the outcome of the proceedings.

RESPECTFULLY SUBMITTED, this 30th day of May, 2017.

/s/Dwight L. Thomas
Dwight L. Thomas
Attorney at Law
Georgia Bar No. 704825

2296 Henderson Mill Road, Ste. 407
Atlanta, GA 30345
(404) 522-1400

GWINNETT COUNTY BOARD OF ETHICS

STATE OF GEORGIA

NANCIE TURNER	:	
	:	
V.	:	CASE NO.:_____
	:	
COMMISSIONER, TOMMY HUNTER	:	
Defendant.	:	
_____	:	

CERTIFICATE OF SERVICE

This certifies that I have this day served a copy of the foregoing document on opposing counsel by fax and email to the following address:

Ms. Christine A. Koehler
Attorney for Nancie Turner
261 W Crogan St, Suite A
Lawrenceville, GA 30046

Mr. David C. Will
Chairperson Board of Ethic
75 Langley Drive
Lawrenceville, GA 30046

Mr. Richard Read Gignilliat
Elarbee, Thompson, Sapp & Willson, LLP
229 Peachtree Street, N.E., Suite 800
Atlanta, GA 30303-1614

RESPECTFULLY SUBMITTED, this 30th day of May, 2017.

GWINNETT COUNTY BOARD OF ETHICS

STATE OF GEORGIA

NANCIE TURNER	:	
	:	
V.	:	CASE NO.:_____
	:	
COMMISSIONER,	:	
TOMMY HUNTER	:	
Defendant.	:	
	:	

ENTRY OF APPEARANCE

COMES NOW, the undersigned counsel and files his ENTRY OF APPEARANCE in the above-styled matter. Please forward any and all court notices to the address listed below.

RESPECTFULLY SUBMITTED, this 30th day of May, 2017.

2296 Henderson Mill Road, Ste. 407
Atlanta, GA 30345
(404) 522-1400

Dwight L. Thomas
Attorney at Law
Georgia Bar No. 704825

ATTACHMENT C

ATTACHMENT G

GWINNETT COUNTY BOARD OF ETHICS

STATE OF GEORGIA

NANCIE TURNER	:	
	:	
V.	:	CASE NO.:_____
	:	
COMMISSIONER,	:	
TOMMY HUNTER	:	
Defendant.	:	
_____	:	

CERTIFICATE OF SERVICE

This certifies that I have this day served a copy of the foregoing document on opposing counsel by fax and email to the following address:

Ms. Christine A. Koehler
Attorney for Nancie Turner
261 W Crogan St. Suite A
Lawrenceville, GA 30046

Mr. David C. Will
Chairperson Board of Ethic
75 Langley Drive
Lawrenceville, GA 30046

RESPECTFULLY SUBMITTED, this 30th day of May, 2017.

D. Lowell Thomas, P.C.
2296 Henderson Mill Road, Ste. 407
Atlanta, GA 30345

Dwight L. Thomas
Attorney for Defendant
Georgia Bar No. 704825

John Lewis is a racist pig. There ain't one political pundit that didn't say on November 9 that this would be Demonrats EXACT response to Trump winning. Like I heard Rush, I believe say, Demonrats DO NOT live in reality. They believe polls were right and THE REAL VOTES were wrong. What a bunch of idiots.

Like Comment Share

ATTACHMENT F

Complainant's
EXHIBIT 1

BEFORE THE GWINNETT COUNTY ETHICS BOARD

STATE OF GEORGIA

In Re: Complaint of Nancie Turner against
Gwinnett County Commissioner Tommy Hunter

Hearing Date: May 31, 2017

CERTIFICATION OF RECORDS

I hereby certify that attached hereto is a true, accurate, and correct copy of the letter I executed and sent via U.S. Mail to the Honorable Congressman John Lewis on January 17, 2017. This letter and Certification is being produced in compliance with a subpoena issued by the Gwinnett County Ethics Board dated May 17, 2017.

Charlotte J. Nash

Charlotte J. Nash, Chairman
Gwinnett County Board of Commissioners

Complainants' EXHIBIT #7

Board of Commissioners

75 Langley Drive • Lawrenceville, GA 30046-6935
770.822.7000 • www.gwinnettcounty.com

Charlotte J. Nash, Chairman
Jace W. Brooks, District 1
Lynette Howard, District 2
Tommy Hunter, District 3
John Heard, District 4

gwinnettcounty

January 17, 2017

Honorable John Lewis
100 Peachtree Street
Suite 1920
Atlanta, GA 30303

Dear Congressman John Lewis:

I am writing you today to offer my sincere apologies and regrets for the disrespectful comments about you posted on social media by a Gwinnett district commissioner. I would further welcome the chance to apologize to you face-to-face if you are willing to give me a few minutes to do so.

I want to assure you that the remarks posted by one commission do not reflect the opinions of the Board of Commissioners as a whole nor do we condone the use of social media to spread negative thoughts about any individual. We understand that our communications carry the weight of our offices and try to manage ourselves accordingly.

Further, the comments expressed by one individual do not reflect the opinions of Gwinnett County residents as a whole. Most of us honor you as a leader in the civil rights movement and as a long-time public servant, even those who may hold different political stances.

I hope that it is still possible to disagree in in a respectful, civil manner without being offensive and without compromising our ability to take principled stands. However, using hurtful words and name-calling should not have a place in governing.

Again, I sincerely apologize and ask for the chance to repeat this apology to you in a face-to-face meeting.

With best regards,

Charlotte J. Nash

Charlotte J. Nash
Chairman, Gwinnett County Board of Commissioners

Tommy Hunter shared What Guys Like's photo.

Yesterday at 2:09 PM ·

What Guys Like

Friday at 9:00 AM ·

Complainant's EXHIBIT 2

Tommy Hunter

December 1 ·

If I were Trump I would reach out to Jill Stein by appointing her Ambassador to Syria or Afghanistan or somewhere like that.

Complainants EXHIBIT 3

14 21 Comments

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Tommy Hunter

You dang skippy Billy boy and I AM one of them.

Bill Clinton bashes Trump, blames 'angry white men' and Comey for wife's loss

Former President Bill Clinton mocked President-elect Donald Trump's intelligence, said "angry white men" helped secure his victory and blamed FBI Director James Comey...

FOXNEWS.COM

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Complainant's EXHIBIT #4

Tommy Hunter

So now "snitties" are a campaign issue?

1 Comment

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Tommy Hunter

Sep 27 at 7:12pm

interesting headline on Fox's website: "Online polls declare Trump debate winner, despite media consensus for Clinton". I, for one, am surprised as the libtard always seems to get more votes, but I think this is one the media elite are really missing.

2 Comments

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Tommy Hunter

Sep 27 at 7:12pm

EXHIBIT E to Complaint