

Sept. 18, 2025

Graham Sloan
Executive Director
Arkansas Ethics Commission
910 West 2nd Street, Suite 100
Little Rock, AR 72201

RE: Formal Ethics Complaints Against Attorney General Tim Griffin, Representative David Ray, Jobs and Growth PAC (JAG PAC), RAY PAC, Base Point PAC, and Gilmore Strategy Group PAC

Dear Mr. Sloan:

Pursuant to the Arkansas Ethics Commission's procedures, we hereby submit this package of formal ethics complaints and accompanying statements of fact for your immediate review and investigation.

This submission alleges a complex and interconnected scheme involving multiple individuals and political action committees that, working in concert, appear to have repeatedly and willfully violated numerous provisions of Arkansas law, including:

- Campaign contribution limits (Ark. Code Ann. § 7-6-203)
- Prohibitions on conduit contributions and illegal coordination (Ark. Code Ann. § 7-6-205)
- Prohibitions on the use of public property for campaign purposes (Ark. Code Ann. § 7-1-103)
- Prohibitions on a public servant receiving outside compensation for official duties (Ark. Code Ann. § 21-8-801)
- Rules governing the proper use of campaign funds and the filing of accurate campaign finance reports

The enclosed materials detail a pattern of conduct centered on Attorney General Tim Griffin and his PAC, Jobs and Growth (JAG PAC), which allegedly utilized a network of controlled PACs — including those operated by his campaign manager, Rep. David Ray, Sen. Ben Gilmore and associates of the Gilmore Strategy Group — to launder contributions, evade contribution limits, and obscure the true source of campaign funds.

Furthermore, the complaints allege the systematic misuse of the Attorney General's office resources for political campaigning and the use of campaign funds to pay a sitting legislator for his official actions, creating a severe conflict of interest and the appearance of quid pro quo.



This package contains the following individual complaints, each with a detailed Statement of Facts:

- A complaint against Attorney General Tim Griffin
- A complaint against Jobs and Growth PAC (JAG PAC)
- A complaint against Rep. David Ray in his role as a legislator
- A complaint against Rep. David Ray as Griffin's campaign manager and officer for the JAG PAC and RAY PAC
- A complaint against RAY PAC
- A complaint against Base Point PAC
- A complaint against Gilmore Strategy Group PAC

Supporting these complaints is a set of shared exhibits, including a graphic illustrating the flow of funds between these entities, which we believe will aid the Commission in its review.

The alleged violations represent a fundamental breach of the public trust and strike at the core of Arkansas's ethics and campaign finance laws, which are designed to ensure transparency, prevent corruption, and maintain the integrity of our electoral process. We respectfully request that the Arkansas Ethics Commission conduct a thorough and immediate investigation into these serious matters and impose all appropriate sanctions as provided by law.

Thank you for your attention to this important matter.

Respectfully submitted,

Janie Ginocchio, MPA
Co-founder, ArkLeg Bill Tracker

Master List of Complaints and Exhibits

Complaints

1. Attorney General Tim Griffin
2. Jobs and Growth PAC (JAG PAC)
3. Rep. David Ray in his role as a legislator
4. Rep. David Ray as Griffin's campaign manager and officer for the JAG PAC and RAY PAC
5. RAY PAC
6. Gilmore Strategy Group PAC
7. Base Point PAC

Exhibits

- A. Base Point PAC Q1 2024 Report
- B. Griffin Campaign Q1 2024 Primary Report
- C. Griffin Campaign Q1 2024 General Report
- D. Gilmore Strategy Group PAC Q1 2025 Report
- E. Gilmore Strategy Group PAC Q2 2025 Report
- F. Griffin Campaign Q1 2025 Primary Report
- G. Griffin Campaign Q1 2025 General Report
- H. Griffin, Ray and Gilmore: The PAC/Campaign Money Loop Graphic
- I. JAG PAC Q4 2021 Report
- J. RAY PAC Q4 2021 Report
- K. JAG PAC Q3 2023 Report
- L. RAY PAC Q3 2023 Report
- M. Base Point PAC Q3 2023 Report
- N. Griffin Campaign Q3 2023 General Report
- O. June 24, 2024 Letter to PEER Committee and Amended Fund Report
- P. Griffin Campaign Q1 2023 Primary Report
- Q. Griffin Campaign Q2 2023 Primary Report
- R. Griffin Campaign Q3 2023 Primary Report
- S. Griffin Campaign Q4 2023 Primary Report
- T. Griffin Campaign Q2 2024 Primary Report
- U. Griffin Campaign Q3 2024 Primary Report
- V. Griffin Campaign Q4 2024 Primary Report
- W. Griffin Campaign Q2 2025 Primary Report
- X. Summary Spreadsheet of Griffin Campaign Reimbursements
- Y. JAG PAC Q1 2024 Report
- Z. Base Point PAC Q4 2023 Report

ARKANSAS ETHICS COMMISSION
Post Office Box 1917
LITTLE ROCK, AR 72203
Phone (501) 324-9600 Toll Free (800) 422-7773

CITIZEN COMPLAINT FORM

The undersigned person files this complaint and requests that the Arkansas Ethics Commission conduct an investigation concerning the facts and actions detailed below for the purpose of determining whether or not there has been a violation of laws under the Commission's jurisdiction.

1. Identify the person you are complaining about:

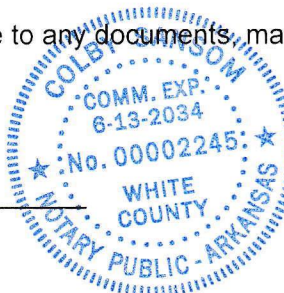
Name: Tim Griffin Position or Title: Attorney General
Address: P.O. Box 7743 Phone: (Home) _____
Little Rock, AR 72217 (Work) (501) 916-0286

2. State in your own words the *detailed* facts and the actions of the person named in section 1 which prompted you to make this complaint. The brief space provided below is not intended to limit your statement of facts. Please use the back of this form or additional sheets if necessary. Include relevant dates, times, and the names, and addresses of other persons whom you believe have knowledge of the facts.

This complaint details numerous serious and repeated ethics violations by Attorney General Tim Griffin,
including illegally accepting over-the-limit campaign contributions, using state resources for campaign p
urposes, and converting campaign funds into a personal slush fund to pay for official government operations.
The complete attached Statement of Facts provides exhaustive evidence of these violations, demonstrating
a systemic disregard for Arkansas campaign finance and ethics laws.

3. Attach or make reference to any documents, materials, minutes, resolutions or other evidence which support your allegations.

State of Arkansas
County of Pulaski



I swear or affirm, under penalty of perjury, that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief.

Subscribed and sworn before me this
18th day of September, 2025.

Signature: [Signature]
Print your name: Janie Ginocchio

Notary Signature:

[Signature]

Mailing address: [Redacted]

My Commission Expires: 06/13/2034

Phone: (Home) [Redacted] (Work) _____

**Statement of Facts in Support of Ethics Complaint
Against Attorney General Tim Griffin**

I. VIOLATIONS OF CAMPAIGN CONTRIBUTION LIMITS (Ark. Code Ann. § 7-6-203)

Base Point PAC Contribution (2024)

1. Base Point PAC's amended Q1 2024 (Exhibit A) report shows a monetary contribution of \$6,600 to "Griffin, Tim" for the "Primary" election on Jan. 12, 2024.
2. The maximum allowable contribution from a PAC to a candidate for a single election in 2024 is \$3,300, as set by the Arkansas Ethics Commission.
3. The contribution of \$6,600 is double the legal limit for a primary election.
4. The Griffin campaign's Q1 2024 report for the 2026 primary election (Exhibit B) reported a \$3,300 donation from Base Point PAC on January 25, 2024.
5. The campaign's Q1 2024 report for the 2026 general election (Exhibit C) reported a separate \$3,300 donation from Base Point PAC on January 25, 2024.
6. This conduct demonstrates a deliberate scheme to split a single, over-the-limit contribution between two separate elections to conceal the violation.

Gilmore Strategy Group PAC Contribution (2025)

1. The Gilmore Strategy Group PAC's Q1 2025 report (Exhibit D) shows it received two \$3,300 contributions from attorneys at Motley Rice LLC, its lobbying client, for a total of \$6,600.
2. On May 2, 2025, the same PAC contributed \$6,600 to the primary campaign of Tim Griffin, according to its Q2 2025 report (Exhibit E).
3. The maximum allowable PAC contribution for a single election in 2025 is \$3,500.
4. The Griffin campaign's Q1 2025 report for the primary (Exhibit F) recorded a \$3,500 donation from this PAC, and its report for the general election (Exhibit G) recorded a \$3,100 donation from the same PAC.
5. This again demonstrates a pattern of accepting a contribution that exceeds the legal limit and splitting it between elections to avoid detection.

II. CONDUIT CONTRIBUTIONS AND ILLEGAL COORDINATION (Ark. Code Ann. § 7-6-205)

A network of PACs controlled by Griffin, Sen. Ben Gilmore, Rep. David Ray, and the Gilmore Strategies Group has worked in concert to violate Ark. Code Ann. § 7-6-205 by laundering contributions to conceal Griffin's Jobs and Growth (JAG) PAC and its donors as the true source of funds for the Griffin campaign. See Exhibit H Griffin, Ray and Gilmore Campaign/PAC Money Loop graphic for a visual representation of the scheme.

Critical Context and Relationships:

1. JAG PAC is Attorney General Tim Griffin's leadership PAC.
2. Rep. David Ray is Griffin's campaign manager, an authorized agent for JAG PAC (signing its reports), and the resident agent for his own RAY PAC.
3. State Sen. Ben Gilmore is the resident agent for Base Point PAC.
4. Jon Gilmore (Ben Gilmore's brother) is the managing partner of the lobbying firm Gilmore Strategy Group and the resident agent for the Gilmore Strategy Group PAC.
5. This interlocking network of individuals and committees demonstrates a singular purpose: to funnel money to the Griffin campaign while obscuring its origin.

Gilmore Strategy Group PAC as a Conduit (2025):

1. The Gilmore Strategy Group PAC's Q1 2025 report shows it received two \$3,300 contributions from attorneys at Motley Rice LLC, a client of its affiliated lobbying firm, for a total of \$6,600.
2. The PAC's Q2 2025 report shows it contributed \$6,600 to the Griffin primary campaign on May 2, 2025.
3. No direct contributions from these attorneys to the Griffin campaign are recorded, indicating the PAC acted as a conduit to launder the funds, violating the prohibition on making and accepting contributions made in the name of another.

RAY PAC as a Conduit (2021 & 2023):

1. Dec. 17, 2021: JAG PAC contributed \$5,000 to RAY PAC (Exhibit I). On the same day, RAY PAC contributed \$3,000 to the Griffin campaign (Exhibit J).
2. Aug. 23, 2023: JAG PAC contributed \$10,000 to RAY PAC (Exhibit K). On the same day, JAG PAC also contributed the maximum amount to Rep. Ray's campaign.
3. Aug. 31, 2023: RAY PAC contributed the maximum amount (\$6,600 total) to the Griffin campaign (Exhibit L).
4. The immediate transfer of funds from JAG PAC to RAY PAC and then to the Griffin campaign demonstrates RAY PAC was used as a pass-through entity to obscure the true source of the contributions.

Base Point PAC as a Conduit (2023-2024):

1. Aug. 25, 2023: JAG PAC contributed \$10,000 to Base Point PAC, its largest contribution received (Exhibit M). It did not receive any other donations until Q1 2024.
2. Jan. 12, 2024: Base Point PAC made the illegal \$6,600 contribution to the Griffin campaign (Its largest single donation) detailed in Section I.
3. This pattern confirms that the excessive contribution from Base Point PAC was funded by JAG PAC, which was itself concealed from the public as the true source.

III. FILING AN INCOMPLETE CAMPAIGN FINANCE REPORT

1. Line 7 on page 1 of the Griffin campaign's Q3 2023 report for the 2026 general (Exhibit N) election lists total monetary contributions for the quarter as \$6,600 and an ending balance of \$6,600.
2. However, the report contains no data on Line 15 (itemized contributions over \$200) and lists \$0 for Lines 16, 17, and 18.
3. The instructions for Line 7 state to enter the total from Line 18.
4. This discrepancy indicates either a false entry on Line 7 or a failure to itemize contributions as required by law, making the report materially misleading and incomplete.

IV. IMPROPER USE OF STATE PROPERTY FOR CAMPAIGN PURPOSES (Ark. Code Ann. § 7-1-103)

1. The Griffin campaign's Q1 2024 report shows a reimbursement of \$145.60 to the Office of the Attorney General for mileage on Feb. 26, 2024.
2. In a June 24, 2024, letter and amended fund report to the legislative PEER Committee (Exhibit O), Griffin cited Ethics Commission Case No. 2022-CO-095 (a public letter of caution issued to Mayor Frank Scott, Jr.) to justify this practice, stating his campaign would track and reimburse for all campaign-related mileage in government vehicles.
3. However, Ark. Code Ann. § 7-1-103(a)(3) explicitly states: "It shall be unlawful for any public servant to use for campaign purposes any item of personal property provided with public funds." The statute contains no provision that reimbursement cures the violation.

4. Griffin's interpretation is a deliberate misreading of the law. Reimbursement is restitution for the violation, not a cure for it. His stated intent to continue this practice demonstrates a willful intent to violate the statute.

V. USE OF CAMPAIGN FUNDS TO UNDERWRITE GOVERNMENT FUNCTIONS (Violations of Ark. Ethics Comm. Rules §§ 207 & 208)

Griffin has systematically used campaign funds to pay for core operational expenses of the Attorney General's office, converting political donations into a government subsidy for his official duties, which is a personal and official benefit.

Payment of Government Training and Meals:

1. The amended quarterly report submitted to the PEER Committee on June 24, 2024, shows a reimbursement of \$743.13 from the Griffin campaign to the AG's office on March 24, 2024, described as "Payment from campaign funds to reimburse office for purchasing food for attorneys during a CLE."
2. Continuing Legal Education (CLE) is a mandatory government training function. Providing meals for staff who attend this training is a core government expense that would exist irrespective of Griffin's campaign or status as a candidate.
3. The campaign also made several reimbursements to Griffin and Rachel Ellis, Director of Public Events and Training for the AG's Office, for "AG staff meals," totaling \$2,790.10. See Exhibit X – Summary Spreadsheet of Griffin Campaign Reimbursements.
4. Providing meals to government employees is a form of compensation or an office operating cost, not a campaign expense.

Inapplicability of Rule § 227:

1. Rule § 227(c) allows the use of remaining campaign funds for "legitimate expenses in connection with the candidate's public office" only if they are "otherwise not reimbursable from public funding."
2. The Attorney General's office has a state budget for operational expenses, including staff training (CLEs) and meals. Using campaign funds for these expenses violates the rule's core limitation by substituting political money for public appropriations.
3. The nature of these expenses — staff training and government employee meals — falls squarely within the normal operation of a state agency, an expense that would exist irrespective of the officeholder's campaign.

VI. USE OF ATTORNEY GENERAL'S OFFICE EMPLOYEES AS CAMPAIGN STAFF (Blurring of Official and Campaign Roles)

1. Throughout 2023 and 2024, the Griffin campaign reported reimbursements for travel, office furniture, office supplies, food, and beverage expenses to at least ten (10) Attorney General's office employees, including senior staff members. (Exhibit X)
2. At least two AG's office employees were paid for services such as "consulting" and "photography." See attached spreadsheet for detailed transactions.
3. This constitutes a clear use of public personnel and resources for campaign purposes.

VII. PAYING A LEGISLATOR TO ADVANCE LEGISLATION EXPANDING THE AG'S POWER (Ark. Code Ann. § 21-8-801 & Advisory Opinion 2000-EC-003)

Outside Compensation for Legislative Duties:

1. Rep. David Ray has served as the paid campaign manager for Attorney General Tim Griffin.
2. Attorney General Griffin was first elected in **November 2022** and was sworn into office in **January 2023**. His next election is not until **November 2026**.
3. Despite the next election being over three and a half years away, during the **2023 Regular Session** (Jan 9 - May 1) — a period demanding his full-time attention to legislative duties — Rep. Ray was paid **\$70,000** by the Griffin campaign (Exhibits P and Q).
4. Similarly, during the **2025 Regular Session** (Jan 13 – May 5), still nearly 20 months from the next election, Rep. Ray was paid an additional **\$60,000** by the same campaign while performing his official legislative duties (Exhibits F and W).
5. **Advisory Opinion 2000-EC-003** is unequivocal: activities such as "drafting, introducing, debating, and voting on bills fall within the duties and responsibilities of a member of the General Assembly." A member is "prohibited by Ark. Code Ann. § 21-8-801 from receiving outside compensation for performing those activities." The timing of these payments, concurrent with the legislative session and distant from any election, demonstrates they were for legislative activity, not legitimate campaign work, and constitute a *per se* violation.

Securing Special Privileges for a Private Employer:

While receiving these payments during session, Rep. Ray was the primary sponsor of

legislation that specifically and directly enhanced the power and authority of his private employer's office (the Attorney General), including:

- **2023 Session:** HB1320/Act 194, which centralized power in the AG's office over citizen-led petitions, and HB1444, which sought to grant the AG veto power over legal settlements of cities and counties.
- **2025 Session:** HB1222/Act 154, granting the AG new power to reject citizen-initiated ballot measures, and HB1637/Act 457, granting the AG a pivotal gatekeeping role over a measure's "financial impact."

This conduct creates a severe conflict of interest and a clear appearance of quid pro quo, strongly suggesting that the official powers of the Attorney General's office were being enhanced in direct exchange for campaign payments to a sitting legislator during the performance of his official duties.

VI. CONCLUSION

This statement of facts alleges a pattern of serious and repeated violations of Arkansas ethics and campaign finance laws by Attorney General Tim Griffin. We respectfully request that the Arkansas Ethics Commission investigate these matters, take appropriate action to ensure future compliance, and impose sanctions as provided by law.

ARKANSAS ETHICS COMMISSION
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Phone (501) 324-9600 Toll Free (800) 422-7773

CITIZEN COMPLAINT FORM

The undersigned person files this complaint and requests that the Arkansas Ethics Commission conduct an investigation concerning the facts and actions detailed below for the purpose of determining whether or not there has been a violation of laws under the Commission's jurisdiction.

1. Identify the person you are complaining about:

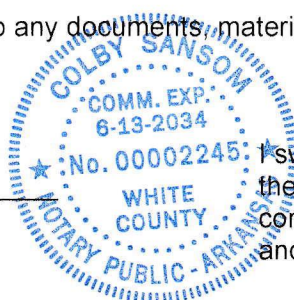
Name: Jobs and Growth PAC/Ryan Holder Position or Title: Resident Agent
Address: P.O. Box 7594 Phone: (Home) _____
Little Rock, AR 72217 (Work) (501) 916-0286

2. State in your own words the *detailed* facts and the actions of the person named in section 1 which prompted you to make this complaint. The brief space provided below is not intended to limit your statement of facts. Please use the back of this form or additional sheets if necessary. Include relevant dates, times, and the names, and addresses of other persons whom you believe have knowledge of the facts.

Jobs and Growth PAC, violated Ark. Code Ann. § 7-1-103(3)(A) by using public personal property —
specifically, a vehicle owned by the Arkansas Attorney General's Office—for campaign-related purposes,
as evidenced by a mileage reimbursement payment of \$1,023.88 made to the state on February 2
A comprehensive Statement of Facts, which provides a full narrative, supporting evidence from official
state documents, and a detailed legal analysis of this violation, is attached to this complaint.

3. Attach or make reference to any documents, materials, minutes, resolutions or other evidence which support your allegations.

State of Arkansas
County of Pulaski



I swear or affirm, under penalty of perjury, that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief.

Subscribed and sworn before me this
18th day of September, 2025.

Signature: [Signature]
Print your name: Janie Ginocchio

Notary Signature:

[Signature]

Mailing address: [Redacted]

My Commission Expires: 06/13/2034

Phone: (Home) [Redacted]

Statement of Facts in Support of Ethics Complaint Against Jobs and Growth PAC

I. CONDUIT CONTRIBUTIONS AND ILLEGAL COORDINATION (Ark. Code Ann. § 7-6-205)

A network of PACs controlled by Attorney General Tim Griffin, Sen. Ben Gilmore, Rep. David Ray, and the Gilmore Strategies Group has worked in concert to violate Ark. Code Ann. § 7-6-205 by laundering contributions to conceal Griffin's Jobs and Growth (JAG) PAC and its donors as the true source of funds for the Griffin campaign. See Exhibit X – Griffin, Ray and Gilmore Campaign/PAC Money Loop graphic.

Critical Context and Relationships:

1. JAG PAC is Attorney General Tim Griffin's leadership PAC.
2. Rep. David Ray is Griffin's campaign manager, an authorized agent for JAG PAC (signing its reports), and the resident agent for his own RAY PAC.
3. State Sen. Ben Gilmore is the resident agent for Base Point PAC.
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5. This interlocking network of individuals and committees demonstrates a singular purpose: to funnel money to the Griffin campaign while obscuring its origin.

Gilmore Strategy Group PAC as a Conduit (2025):

1. The Gilmore Strategy Group PAC's Q1 2025 report (Exhibit D) shows it received two \$3,300 contributions from attorneys at Motley Rice LLC, a client of its affiliated lobbying firm, for a total of \$6,600.
2. The PAC's Q2 2025 report (Exhibit E) shows it contributed \$6,600 to the Griffin primary campaign on May 2, 2025.
3. No direct contributions from these attorneys to the Griffin campaign are recorded, indicating the PAC acted as a conduit to launder the funds, violating the prohibition on making and accepting contributions made in the name of another.

RAY PAC as a Conduit (2021 & 2023):

1. Dec. 17, 2021: JAG PAC contributed \$5,000 to RAY PAC (Exhibit I). On the same day, RAY PAC contributed \$3,000 to the Griffin campaign (Exhibit J).

2. Aug. 23, 2023: JAG PAC contributed \$10,000 to RAY PAC (Exhibit K). On the same day, JAG PAC also contributed the maximum amount to Rep. Ray's campaign.
3. Aug. 31, 2023: RAY PAC contributed the maximum amount (\$6,600 total) to the Griffin campaign (Exhibit L).
4. The immediate transfer of funds from JAG PAC to RAY PAC and then to the Griffin campaign demonstrates RAY PAC was used as a pass-through entity to obscure the true source of the contributions.

Base Point PAC as a Conduit (2023-2024):

1. Aug. 25, 2023: JAG PAC contributed \$10,000 to Base Point PAC, its largest contribution (Exhibit M). It received no other contributions until Q1 2024.
2. Jan. 12, 2024: Base Point PAC made a \$6,600 contribution to the Griffin primary campaign, its largest single donation (Exhibit A).

II. USE OF PUBLIC PROPERTY FOR POLITICAL PURPOSES (Ark. Code Ann. § 7-1-103(3)(A))

1. **The Transaction:** On Feb. 26, 2024, JAG PAC made a reimbursement of \$1,023.88 to the Arkansas Attorney General's Office (Exhibit Y). This payment is explicitly labeled as a "Mileage reimbursement" in the "Cash Funds - Misc. Receipts" section of the Attorney General's Office official quarterly report submitted to the legislature (Exhibit O). This expense is recorded in JAG PAC's Q1 2024 report.
2. **Official Justification:** In a letter dated June 24, 2024, addressed to the Legislative PEER Subcommittee (Exhibit O), Attorney General Tim Griffin confirmed the nature of this transaction. He stated that he travels to "campaign events in government-owned vehicles" and that his "campaign or PAC then reimburses this office for such mileage." He identified these as "recurring entries."
3. **Purpose of the Travel:** According to the Attorney General's own letter, the travel for which the PAC reimbursed the state was to attend "campaign events." The reimbursement from JAG PAC — a political action committee explicitly organized to support or oppose candidates and ballot measures — confirms that the travel was for political purposes, not official state business.
4. This action violates Ark. Code Ann. § 7-1-103(3)(A), which states: "No public servant shall use or authorize the use of public personal property, including, without limitation, motor vehicles... for the purpose of campaigning for any candidate or ballot measure."

5. **The Reimbursement is Irrelevant to the Violation:** The violation is complete upon the use of the property for a prohibited purpose. The statute contains no exception for reimbursement. The attempt to reimburse the state after the fact does not absolve the initial illegal act; it merely serves as an admission that the property was used for a non-official, campaign-related purpose. The PAC's payment is a record of its involvement in securing the use of state property for its political objectives.

III. CONCLUSION

This statement of facts alleges a pattern of serious and repeated violations of Arkansas ethics and campaign finance laws by Attorney General Tim Griffin. We respectfully request that the Arkansas Ethics Commission investigate these matters, take appropriate action to ensure future compliance, and impose sanctions as provided by law.

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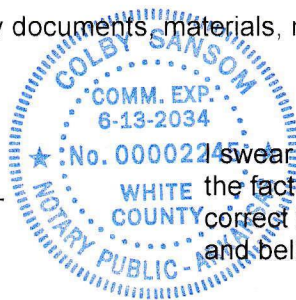
Name: David Ray Position or Title: State Representative
Address: 137 Summit Valley Circle Phone: (Home) _____
Maumelle, AR 72113 (Work) (501) 916-0286

2. State in your own words the *detailed* facts and the actions of the person named in section 1 which prompted you to make this complaint. The brief space provided below is not intended to limit your statement of facts. Please use the back of this form or additional sheets if necessary. Include relevant dates, times, and the names, and addresses of other persons whom you believe have knowledge of the facts.

This complaint alleges Representative David Ray illegally accepted over \$130,000 in campaign salary from Attorney General Tim Griffin's campaign specifically during legislative sessions, constituting unlawful outside compensation for his official duties as a state legislator. As detailed in the attached Statement of Facts, these payments coincided with Rep. Ray sponsoring multiple bills that dramatically expanded the power and authority of his private employer's office, creating a severe conflict of interest.

3. Attach or make reference to any documents, materials, minutes, resolutions or other evidence which support your allegations.

State of Arkansas
County of Pulaski



I swear or affirm, under penalty of perjury, that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief.

Subscribed and sworn before me this
18th day of September, 2025

Signature: [Signature]
Print your name: Janie Ginocchio

Notary Signature: [Signature]
My Commission Expires: 06/13/2034

Mailing address: [Redacted]
[Redacted]
Phone: (Home) [Redacted] (Work) [Redacted]

Statement of Facts in Support of Ethics Complaint Against Rep. David Ray

I. ACCEPTING OUTSIDE COMPENSATION FOR OFFICIAL DUTIES (Ark. Code Ann. § 21-8-801)

Critical Context

1. Attorney General Tim Griffin was first elected in November 2022 and was sworn into office in January 2023.
2. His next election for the office of Attorney General is not until November 2026.
3. Rep. David Ray has continuously served as Griffin's campaign manager since 2021. He went from a consultant to a paid campaign worker in Q1 2023, according to Griffin's campaign reports.
4. He is compensated an average of \$10,000 per month, according to Griffin campaign reports. He has earned approximately \$500,000 from the campaign since 2021.
5. The 2023 Regular Session of the 94th General Assembly ran from Jan. 9, 2023, to May 1, 2023.
6. The 2025 Regular Session of the 94th General Assembly ran from Jan. 13, 2025, to May 5, 2025.

During these specific, finite periods — when the General Assembly was in session and Rep. David Ray's full-time attention was constitutionally required for legislative work — he received his salary from an entity with a direct and substantial interest in the legislation before him.

Compensation for Legislative Duties in the 2023 Session:

1. The Tim Griffin for Attorney General campaign's quarterly reports show that during the exact timeframe of the 2023 Regular Session, the campaign paid Ray \$70,000 (\$40,000 in Q1 [Exhibit P] and \$30,000 in Q2 [Exhibit Q]).
2. Given that the next election was over three and a half years away, there is no credible, legitimate campaign activity that would necessitate a full-time campaign manager's salary concurrent with the full-time demands of the legislative session.

Compensation for Legislative Duties in the 2025 Session:

Similarly, during the exact timeframe of the 2025 Regular Session, a point still 20 months away from the next election, the campaign paid Ray \$60,000 (\$30,000 in Q1 [Exhibit F] and \$30,000 in Q2 [Exhibit W]).

Advisory Opinion No. 2000-EC-003

The guidance from the opinion is unequivocal:

1. "The Commission interprets Ark. Code Ann. § 21-8-801 to mean that... a public servant cannot receive outside compensation for performing the duties and responsibilities of his or her job."
2. "Activities such as drafting, introducing, debating, and voting on bills fall within the duties and responsibilities of a member of the General Assembly."
3. "Accordingly, the Commission concludes that a member of the General Assembly... is prohibited by Ark. Code Ann. § 21-8-801 from receiving outside compensation for performing those activities."

II. SECURING SPECIAL PRIVILEGES FOR A PRIVATE EMPLOYER

1. While receiving these payments during session, Ray was the primary sponsor of legislation that specifically and directly enhanced the power and authority of his private employer's office (the Attorney General), including:
2. **2023 Session:** HB1320/Act 194, which centralized power in the AG's office over citizen-led petitions, and HB1444, which sought to grant the AG veto power over legal settlements of cities and counties.
3. **2025 Session:** HB1222/Act 154, granting the AG new power to reject citizen-initiated ballot measures, and HB1637/Act 457, granting the AG a pivotal gatekeeping role over a measure's "financial impact."
4. This conduct creates a severe conflict of interest and a clear appearance of quid pro quo, strongly suggesting that the official powers of the Attorney General's office were being enhanced in direct exchange for campaign payments to a sitting legislator during the performance of his official duties.

III. CONCLUSION

This statement of facts alleges a pattern of serious and repeated violations of Arkansas ethics and campaign finance laws by Rep. David Ray. We respectfully request that the Arkansas Ethics Commission investigate these matters, take appropriate action to ensure future compliance, and impose sanctions as provided by law.

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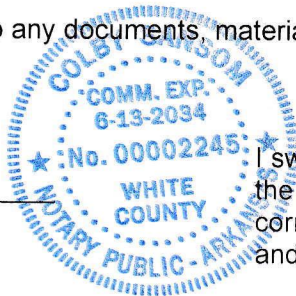
Name: David Ray Position or Title: Campaign manager/PAC officer
Address: 137 Summit Valley Circle Phone: (Home) _____
Maumelle, AR 72113 (Work) (501) 916-0286

2. State in your own words the *detailed* facts and the actions of the person named in section 1 which prompted you to make this complaint. The brief space provided below is not intended to limit your statement of facts. Please use the back of this form or additional sheets if necessary. Include relevant dates, times, and the names, and addresses of other persons whom you believe have knowledge of the facts.

The specifics of this complaint, including evidence of illegal conduit contributions, are detailed in the attached Statement of Facts. That document meticulously outlines Representative Ray's integral role in these activities.

3. Attach or make reference to any documents, materials, minutes, resolutions or other evidence which support your allegations.

State of Arkansas
County of Pulaski



I swear or affirm, under penalty of perjury, that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief.

Subscribed and sworn before me this
18th day of September, 2025.

Signature: [Signature]

Print your name: Janie Ginocchio

Notary Signature:

[Signature]

Mailing address: [Redacted]

My Commission Expires: 06/13/2034

Phone: (Home) [Redacted] (Work) _____

Statement of Facts in Support of Ethics Complaint Against David Ray

I. CONDUIT CONTRIBUTIONS AND ILLEGAL COORDINATION (Ark. Code Ann. § 7-6-205)

A network of PACs controlled by Attorney General Tim Griffin, Sen. Ben Gilmore, Rep. David Ray, and the Gilmore Strategies Group has worked in concert to violate Ark. Code Ann. § 7-6-205 by laundering contributions to conceal Griffin's Jobs and Growth (JAG) PAC and its donors as the true source of funds for the Griffin campaign. See Exhibit X Griffin, Ray and Gilmore Campaign/PAC Money Loop graphic.

Critical Context and Relationships:

1. JAG PAC is Attorney General Tim Griffin's leadership PAC.
2. Rep. David Ray is Griffin's campaign manager, an authorized agent for JAG PAC (signing its reports), and the resident agent for his own RAY PAC.
3. State Sen. Ben Gilmore is the resident agent for Base Point PAC.
4. Jon Gilmore (Ben Gilmore's brother) is the managing partner of the lobbying firm Gilmore Strategy Group and the resident agent for the Gilmore Strategy Group PAC.
5. This interlocking network of individuals and committees demonstrates a singular purpose: to funnel money to the Griffin campaign while obscuring its origin.

David Ray's Central Role in Facilitating Violations:

1. Representative David Ray's interlocking roles were essential to the operation of this conduit scheme, directly facilitating violations of both Ark. Code Ann. § 7-6-205(a) (giving) and (b) (receiving).
2. **As the Controller of RAY PAC**, Ray violated § 7-6-205(a) by using his PAC as a pass-through to make contributions to the Griffin campaign **in the name of JAG PAC**, the true source of the funds.
3. **As the Campaign Manager for Tim Griffin**, Ray violated § 7-6-205(b) by knowingly accepting contributions into the campaign that he knew were made by JAG PAC (one person) **in the name of RAY PAC** (another person).
4. His unique position—acting as an agent for the donor (JAG PAC), the conduit (RAY PAC), and the recipient (Griffin campaign)—eliminates any plausible deniability and demonstrates a knowing violation of the prohibition against conduit contributions.

Gilmore Strategy Group PAC as a Conduit (2025):

1. The Gilmore Strategy Group PAC's Q1 2025 report (Exhibit D) shows it received two \$3,300 contributions from attorneys at Motley Rice LLC, a client of its affiliated lobbying firm, for a total of \$6,600.
2. The PAC's Q2 2025 report shows it contributed \$6,600 to the Griffin primary campaign on May 2, 2025 (Exhibit E).
3. No direct contributions from these attorneys to the Griffin campaign are recorded, indicating the PAC acted as a conduit to launder the funds, violating the prohibition on making and accepting contributions made in the name of another.

RAY PAC as a Conduit (2021 & 2023):

1. Dec. 17, 2021: JAG PAC contributed \$5,000 to RAY PAC (Exhibit I). On the same day, RAY PAC contributed \$3,000 to the Griffin campaign (Exhibit J).
2. Aug. 23, 2023: JAG PAC contributed \$10,000 to RAY PAC (Exhibit K). On the same day, JAG PAC also contributed the maximum amount to Rep. Ray's campaign.
3. Aug. 31, 2023: RAY PAC contributed the maximum amount (\$6,600 total) to the Griffin campaign (Exhibit L).
4. The immediate transfer of funds from JAG PAC to RAY PAC and then to the Griffin campaign demonstrates RAY PAC was used as a pass-through entity to obscure the true source of the contributions.

Base Point PAC as a Conduit (2023-2024):

1. Aug. 25, 2023: JAG PAC contributed \$10,000 to Base Point PAC, its largest contribution (Exhibit M). It received no other contributions until Q1 2024.
2. Jan. 12, 2024: Base Point PAC made a \$6,600 contribution to the Griffin primary campaign, its largest single donation (Exhibit A).

II. CONCLUSION

This statement of facts alleges a pattern of serious and repeated violations of Arkansas ethics and campaign finance laws by Rep. David Ray. We respectfully request that the Arkansas Ethics Commission investigate these matters, take appropriate action to ensure future compliance, and impose sanctions as provided by law.

ARKANSAS ETHICS COMMISSION
Post Office Box 1917
LITTLE ROCK, AR 72203
Phone (501) 324-9600 Toll Free (800) 422-7773

CITIZEN COMPLAINT FORM

The undersigned person files this complaint and requests that the Arkansas Ethics Commission conduct an investigation concerning the facts and actions detailed below for the purpose of determining whether or not there has been a violation of laws under the Commission's jurisdiction.

1. Identify the person you are complaining about:

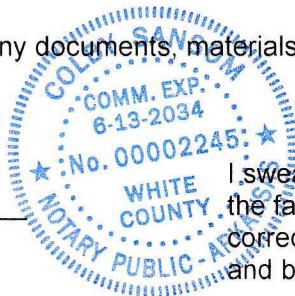
Name: RAY PAC/David Ray Position or Title: Resident Agent
Address: 137 Summit Valley Circle Phone: (Home) _____
Maumelle, AR 72113 (Work) (501) 916-0286

2. State in your own words the *detailed* facts and the actions of the person named in section 1 which prompted you to make this complaint. The brief space provided below is not intended to limit your statement of facts. Please use the back of this form or additional sheets if necessary. Include relevant dates, times, and the names, and addresses of other persons whom you believe have knowledge of the facts.

The specifics of this complaint, including evidence of illegal conduit contributions, are detailed in the attached Statement of Facts. That document meticulously outlines Representative Ray's integral role in these activities.


3. Attach or make reference to any documents, materials, minutes, resolutions or other evidence which support your allegations.

State of Arkansas
County of Pulaski



I swear or affirm, under penalty of perjury, that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief.


Subscribed and sworn before me this
18th day of September, 2025.

Signature: 

Print your name: Janie Ginocchio

Notary Signature:



Mailing address: 

My Commission Expires: 06/13/2034

Phone: (Home)  (rk) _____

Statement of Facts in Support of Ethics Complaint Against RAY PAC

I. CONDUIT CONTRIBUTIONS AND ILLEGAL COORDINATION (Ark. Code Ann. § 7-6-205)

Critical Context and Relationships

1. JAG PAC is Attorney General Tim Griffin's leadership PAC.
2. Rep. David Ray is Griffin's campaign manager, an authorized agent for JAG PAC (signing its reports), and the resident agent for his own RAY PAC.

2021

1. On Dec. 17, 2021, JAG PAC contributed \$5,000 to RAY PAC (Exhibit I).
2. On the same day, RAY PAC contributed a total of \$3,000 (\$100 Primary and \$2,900 General) to the Griffin campaign (Exhibit J).
3. The timing and amounts strongly indicate that the JAG PAC funds were earmarked for and forwarded to the Griffin campaign via RAY PAC.

2023

1. On Aug. 23, 2023, JAG PAC contributed \$10,000 to RAY PAC (Exhibit K).
2. On Aug. 31, 2023 (within one week), RAY PAC contributed the maximum allowable amount to the Griffin campaign (Exhibit L) for both the Primary and General elections (\$3,300 each, totaling \$6,600).
3. This pattern is repeated: a large sum from JAG PAC is received by RAY PAC, followed almost immediately by a maximum contribution to the Griffin campaign.

II. CONCLUSION

Arkansas law prohibits contributions made in violation of the campaign finance laws, which include contributions made by one entity with the understanding that they will be passed on to a specific candidate, thereby concealing the original source.

In these instances, JAG PAC is the true source of funds contributing to the Griffin campaign. RAY PAC did not act as an independent committee making its own discretionary contributions. Instead, it served as a conduit to launder the money and obscure that JAG PAC — a PAC controlled by the same individual who manages the beneficiary's campaign — was the entity financing the contributions.

This activity violates the spirit and letter of Ark. Code Ann. § 7-6-205 by making and accepting contributions that circumvent contribution limits and transparency requirements.

We respectfully request that the Arkansas Ethics Commission investigate these matters, take appropriate action to ensure future compliance, and impose sanctions as provided by law.

ARKANSAS ETHICS COMMISSION
Post Office Box 1917
LITTLE ROCK, AR 72203
Phone (501) 324-9600 Toll Free (800) 422-7773

CITIZEN COMPLAINT FORM

The undersigned person files this complaint and requests that the Arkansas Ethics Commission conduct an investigation concerning the facts and actions detailed below for the purpose of determining whether or not there has been a violation of laws under the Commission's jurisdiction.

1. Identify the person you are complaining about:

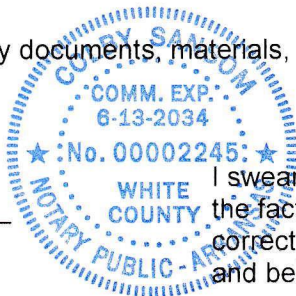
Name: Gilmore Strategy Group PAC/Jon Gilmore Position or Title: Resident Agent
Address: PO Box 1955 Phone: (Home) _____
Little Rock, AR 72203 (Work) (501) 830-1495

2. State in your own words the *detailed* facts and the actions of the person named in section 1 which prompted you to make this complaint. The brief space provided below is not intended to limit your statement of facts. Please use the back of this form or additional sheets if necessary. Include relevant dates, times, and the names, and addresses of other persons whom you believe have knowledge of the facts.

This complaint alleges two specific violations of the Arkansas Code of Ethics by the Gilmore Strategy Group PAC: earmarking/conduit contributions and over-the-limit contribution. A complete and detailed Statement of Facts, which includes specific dates, amounts, and citations to the PAC's own publicly filed quarterly reports (Q1 and Q2 2025), is attached to this complaint.

3. Attach or make reference to any documents, materials, minutes, resolutions or other evidence which support your allegations.

State of Arkansas
County of Pulaski



I swear or affirm, under penalty of perjury, that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief.

Subscribed and sworn before me this
18th day of September, 2025.

Signature: [Signature]

Print your name: Janie Ginocchio

Notary Signature:

Mailing address: [Redacted]

My Commission Expires: 06/13/2034

Phone: (Home) [Redacted] (Work) _____

Statement of Facts in Support of Ethics Complaint Against Gilmore Strategy Group PAC

I. CONDUIT CONTRIBUTIONS AND ILLEGAL COORDINATION (Ark. Code Ann. § 7-6-205)

1. According to the Gilmore Strategy Group PAC's Q1 2025 report (Exhibit D), the PAC received two substantial contributions:
 - a. On Feb. 18, 2025, Lance Oliver, an attorney with Motley Rice LLC, contributed \$3,300.00.
 - b. On March 5, 2025, Serena Hollowell, also an attorney with Motley Rice LLC, contributed \$3,300.00.
2. These were the only two itemized contributions received by the PAC in Q1 2025, for a combined total of \$6,600.
3. **Business Relationship:** Gilmore Strategy Group (operating under the fictitious name "Gilmore Davis Strategies") is a registered lobbyist in the state of Arkansas for the law firm Motley Rice LLC. This establishes a clear client-lobbyist relationship between the source of the funds (Motley Rice attorneys) and the recipient PAC's affiliated entity.
4. **Subsequent PAC Expenditure:** According to the same PAC's Q2 2025 report (Exhibit E), on May 2, 2025, the Gilmore Strategy Group PAC made a monetary contribution of \$6,600 to the primary campaign of Tim Griffin, Arkansas Attorney General.
5. **Absence of Direct Donations:** A review of publicly available campaign finance reports for Attorney General Tim Griffin's primary campaign reveals no record of contributions from Lance Oliver, Serena Hollowell, or any other individuals associated with Motley Rice LLC in an amount exceeding the reporting threshold during the relevant period.
6. The timing, identical amounts, and source of the funds strongly indicate that the contributions from the two Motley Rice attorneys were earmarked for the specific purpose of being forwarded to the Tim Griffin campaign. The PAC acted as a conduit, effectively hiding the original source of the funds.
7. The structure of these transactions concealed the true origin of the campaign funds from the public, undermining the transparency required by Arkansas election law.

II. VIOLATION OF CAMPAIGN CONTRIBUTION LIMITS (Ark. Code Ann. § 7-6-203)

1. The Gilmore Strategy Group PAC's contribution of \$6,600 to the Tim Griffin primary campaign, as reported in its Q2 2025 report, far exceeds the statutory limit for contributions to a candidate for Attorney General.

2. According to the Ethics Commission, the maximum contribution an individual or PAC may make to a candidate for statewide office is \$3,500 per election (e.g., primary, general, runoff).
3. By contributing \$6,600 to a single candidate for a single election (the primary), the Gilmore Strategy Group PAC exceeded the legal contribution limit by \$3,100. This appears to be a direct violation of Ark. Code Ann. § 7-6-203.

III. CONCLUSION

The documented flow of funds — from Motley Rice attorneys to their lobbyist's PAC, and then in an identical sum to a candidate for Attorney General — presents compelling evidence of earmarking designed to circumvent campaign finance disclosure laws.

Furthermore, the amount of the contribution to the candidate is excessive under Arkansas law. These actions violate the core principles of transparency and fairness in the electoral process.

We respectfully request that the Arkansas Ethics Commission immediately investigate these matters, take appropriate action to ensure compliance with state law, and impose all applicable penalties.

ARKANSAS ETHICS COMMISSION
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LITTLE ROCK, AR 72203
Phone (501) 324-9600 Toll Free (800) 422-7773

CITIZEN COMPLAINT FORM

The undersigned person files this complaint and requests that the Arkansas Ethics Commission conduct an investigation concerning the facts and actions detailed below for the purpose of determining whether or not there has been a violation of laws under the Commission's jurisdiction.

1. Identify the person you are complaining about:

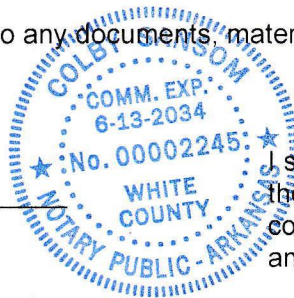
Name: Base Point PAC/Lewis B. Gilmore Position or Title: Registered Agent
Address: 101 Mann Rd. Phone: (Home) _____
Marianna, AR, 72360 (Work) 501-467-5952

2. State in your own words the *detailed* facts and the actions of the person named in section 1 which prompted you to make this complaint. The brief space provided below is not intended to limit your statement of facts. Please use the back of this form or additional sheets if necessary. Include relevant dates, times, and the names, and addresses of other persons whom you believe have knowledge of the facts.

Base Point PAC has committed multiple campaign finance violations, including making a contribution exceeding the statutory limit to a candidate and filing inconsistent and inaccurate reports that demonstrate a failure to maintain proper records. Please see the attached "Statement of Facts" for a full, detailed explanation with specific citations to the filed reports.

3. Attach or make reference to any documents, materials, minutes, resolutions or other evidence which support your allegations.

State of Arkansas
County of Pulaski



I swear or affirm, under penalty of perjury, that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief.

Subscribed and sworn before me this
18th day of September, 2025.

Signature: [Signature]

Print your name: Janie Ginocchio

Notary Signature:

[Signature]

Mailing address: [Redacted]

My Commission Expires: 06/13/2034

Phone: (Home) [Redacted]

Statement of Facts in Support of Ethics Complaint Against Base Point PAC

I. VIOLATION OF CAMPAIGN CONTRIBUTION LIMITS (Ark. Code Ann. § 7-6-203)

1. Base Point PAC's amended Q1 2024 Quarterly Report (Exhibit A) on page 4, Line 19, itemizes a monetary contribution of \$6,600 on Jan. 12, 2024, to Attorney General Tim Griffin for the 2026 primary election.
2. The maximum allowable contribution from a PAC to a candidate for a single election was \$3,300 in 2024, as set by the Arkansas Ethics Commission. The contribution of \$6,600 is double the legal limit for a primary election.
3. This contribution appears to be a clear violation of Ark. Code Ann. § 7-6-203.

II. CONDUIT CONTRIBUTIONS AND ILLEGAL COORDINATION (Ark. Code Ann. § 7-6-205)

1. Aug. 25, 2023: Griffin's Jobs and Growth (JAG) PAC contributed \$10,000 to Base Point PAC (Exhibit K).
2. Jan. 12, 2024: Base Point PAC made the illegal \$6,600 contribution to the Griffin campaign detailed in Section I.
3. This pattern confirms that the excessive contribution from Base Point PAC was funded by JAG PAC, which was itself concealed from the public as the true source.

III. FAILURE TO MAINTAIN ACCURATE AND CONSISTENT RECORDS (Ark. Code Ann. § 7-6-207)

Inaccurate Fund Balances

1. Base Point PAC's Q4 2023 Report (Exhibit Z) states a closing balance of funds on December 31, 2023, of \$11,121.40 (Page 1, Line 9).
2. Base Point PAC's subsequent amended Q1 2024 Report states a beginning balance of funds on January 1, 2024, of \$0.00 (Page 1, Line 4).
3. The financial records of a committee must be continuous and accurate from one reporting period to the next. A discrepancy of over \$11,000 between the ending balance of one quarter and the beginning balance of the next indicates a severe failure in record-keeping, making it impossible to accurately track the committee's finances and ensure compliance with other statutes.

Failure to Accurately Record Donations

1. Base Point PAC's amended Q1 2024 Report (Page 2, Line 11) lists a monetary contribution of \$10,000 received from "Jobs and Growth PAC" on Sept. 5, 2023.

2. However, the JAG PAC Q3 2023 Amended Report (filed 10/10/2023), which is the source of this contribution, tells a different story. On Page 4, Line 19, JAG PAC reports a contribution of \$10,000 to "Base Point PAC" on Aug. 25, 2023.
3. This Aug. 25 date is corroborated by Base Point PAC's *own* Q3 2023 Report (amended) which on Page 2 lists the \$10,000 contribution from JAG PAC as received on Aug. 25, 2023.
4. The contribution from JAG PAC to Base Point PAC definitively occurred on Aug. 25, 2023, and was properly reported as such by both parties in their Q3 2023 filings. For Base Point PAC to later report this same contribution in a Q1 2024 filing with an incorrect date of Sept. 5, 2023, constitutes the filing of an inconsistent and inaccurate report. This creates significant confusion regarding the timeline of financial activity and calls into question the overall reliability of the Committee's filings.

IV. CONCLUSION

The documented evidence indicates that Base Point PAC has likely violated Arkansas campaign finance law by: (1) making a contribution to a candidate that exceeds the statutory limit; (2) serving as a conduit to hide the true donor of campaign funds (3) failing to maintain accurate financial records, as evidenced by a significant and unexplained discrepancy in fund balances; and (4) filing a report that contains a material inaccuracy regarding the date of a major contribution.

We respectfully request that the Arkansas Ethics Commission investigate these matters, take appropriate action to ensure future compliance, and impose sanctions as provided by law.