

**BEFORE THE OHIO ELECTIONS COMMISSION**

**SCOTT A. PULLINS, ESQ.**  
ATTORNEY & COUNSELOR AT LAW  
110 EAST GAMBIER STREET, 2<sup>ND</sup> FLOOR  
MOUNT VERNON, OHIO 43050

COMPLAINANT,

VS.

**THOM COLLIER**  
607 EAST HIGH STREET  
MOUNT VERNON, OHIO 43050

RESPONDENT,

CASE NO. \_\_\_\_\_

**VERIFIED COMPLAINT**

Now comes attorney Scott A. Pullins, and after being duly cautioned and sworn, deposes and states the following:

1. I am a Mount Vernon, Ohio attorney and have personal knowledge of the facts contained herein.
2. Thom Collier is a former State Representative and a candidate for the Republican nomination to the 19<sup>th</sup> Senate District.

**COUNT ONE – FALSE STATEMENT UNDER ORC 3517.21(10)**

3. On April 1, 2010, Thom Collier made the following false statement in a news release that was issued publicly:

*Collier ultimately received the appointment to the Ohio House of Representatives and it was widely reported that these false allegations made by Pullins were nothing more than sour grapes. See attached Exhibit 1.*

4. The undersigned complainant has never made a false allegation about Thom Collier.
5. In 2000, the complainant did issue letters and news releases that stated that Thom Collier

had owed over \$10,000.00 in back taxes to the Internal Revenue Service.

6. In fact, public records showed that in 2000 Thom Collier owed over \$12,448.19 to the Internal Revenue Service in unpaid back taxes. **See attached Exhibits 2, 3, and 4.**

7. Upon knowledge and belief, Thom Collier has never paid the Internal Revenue Service the \$12,448.19 that was owed.

8. Upon knowledge and belief, Thom Collier was able to obtain a release of these liens because the ten year statute of limitations had run. **See attached Exhibits 5, 6, and 7.**

9. The statement that “these false allegations made by Pullins were nothing more than sour grapes,” is a false statement concerning a candidate that was knowingly and recklessly made for the purposes of promoting the candidacy of Thom Collier in violation of Ohio Revised Code Sections 3517.21(10).

#### **COUNT TWO – FALSE STATEMENT UNDER ORC 3517.21(10)**

10. On April 1, 2010 Thom Collier issued a news release (See exhibit 1 again) where he made the following false statements:

*These false attacks were used against me almost a decade ago during my first campaign for the Ohio House. There allegations were proven false in 2000, and they are still false today.*

11. The attacks refer to the statements made by the complaintant in 2000 and also a mail piece issued by the Kris Jordan for Senate Committee. **See attached Exhibit 8.**

12. As referenced above, in 2000 Thom Collier owed \$12, 448.19 to the Internal Revenue Service for unpaid taxes.

13. These unpaid taxes dated from December 31, 1988. See attached **Exhibits 2, 3, and 4 again.**

14. Even if Thom Collier did pay these taxes in 2000 and had the liens released, it took him nearly 12 years to do so.

15. The uncontroverted fact is that Thom Collier did not pay his taxes when they were due and the Internal Revenue Service was forced to file three separate tax liens against him as a result.

16. Upon knowledge and belief, Thom Collier has never paid the Internal Revenue Service the \$12,448.19 that was owed.

17. Upon knowledge and belief, Thom Collier was able to obtain a release of these liens because the ten year statute of limitations had run.

18. On November 15, 2008 the Ohio Department of Taxation filed a tax lien against Thom Collier in the Knox County Common Pleas Court. **See attached Exhibit 9.**

19. The uncontroverted fact is that Thom Collier did not pay his taxes when they were due and the Ohio Department of Taxation was required to file a tax lien against him as a result.

20. On September 4, 2009, nearly one year later, Thom Collier obtained a release of the tax lien filed against him by the Ohio Department of Taxation. **See attached Exhibit 10.**

21. The statement that “These false attacks were used against me almost a decade ago during my first campaign for the Ohio House. There allegations were proven false in 2000, and they are still false today” is a false statement concerning a candidate that was knowingly and recklessly made for the purposes of promoting the candidacy of Thom Collier in violation of Ohio Revised Code Sections 3517.21(10).

22. Complainant requests an expedited hearing as permitted under Ohio Revised Code Section 3517.156.

23. Complainant requests that the panel find probable cause for violations and

proceed to a full hearing on this matter on an expedited basis.

24. Further Affiant saith naught.

*S.A. Pullins*

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Scott A. Pullins (0076809)  
110 East Gambier Street  
Mount Vernon, Ohio 43050-1186  
740-392-3505  
202-330-4594 FAX  
[scott@pullinslaw.com](mailto:scott@pullinslaw.com)  
[www.pullinslaw.com](http://www.pullinslaw.com)

Attorney & Complainant

Sworn to before me and subscribed in my presence this 2<sup>nd</sup> day of April, 2010.

*Jon C. Wilson*

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Jon C. Wilson, Notary Public



JON C WILSON  
NOTARY PUBLIC - OHIO  
MY COMMISSION EXPIRES 7-18-14

April 01, 2010

## Complaint Filed Over Blatantly False Allegations

Today, The Committee to Elect Thom Collier filed a formal complaint with the Ohio Elections Commission against Kris Jordan and the Friends of Kris Jordan committee for untruthful attacks against Thom Collier. The outrageous and untruthful comments about Collier were included in a district-wide mailer the week of March 29th.

“At first, I thought this was an April Fool’s joke, but unfortunately it was just my opponent trying to fool the voters. Even though my opponent’s campaign manager knew this information was false, my opponent chose to use it anyway - a blatant violation of Ohio’s election law.” Collier said.

\* In 2000, when Collier was a candidate for the Ohio House, he was completely vetted by both the media and the House Republican Caucus regarding these same allegations. In 2000, these allegations were brought forth by Scott Pullins, a Mount Vernon attorney who was also vying for the State Representative appointment. Collier ultimately received the appointment to the Ohio House of Representatives and it was widely reported that these false allegations made by Pullins were nothing more than political sour grapes. Collier was appointed and subsequently elected to four terms because of his conservative principles and outstanding record of public service. In 2010, Collier is running for the Ohio Senate and basing his positive campaign on the need for conservative leadership in Ohio.

Collier commented, “My opponent, has distorted my record in the Ohio House and blatantly lied about me personally. Ohioans are sick of political dirty tricks, and we want to make sure my opponent is held accountable for using outrageous personal smear tactics and lying about my record. “

\* Collier concluded, “My opponent is a perfect example of a career politician and political climber who will do anything to get elected. These false attacks were used against me almost a decade ago during my first campaign for the Ohio House. These allegations were proven false in 2000, and they are still false today.”

Collier campaign spokesman, Matt Parker said, “Thom Collier is running an honorable campaign based upon facts. In stark contrast, Kris Jordan has resorted to using false allegations to try and destroy the reputation of a good man. Like most people in the 19th Senate District, we are doing our spring cleaning - cleaning away the mud that was desperately thrown at the voters by Kris Jordan.”

Parker concluded, “Kris has worked most of his career inside government, and he has spent a lot of his time campaigning for the next office instead of working hard for his constituents. We should not be surprised that he would resort to lies, because to Kris Jordan, truthfulness, honor, and dignity are a distant second to winning an election.”



Form 668 (Y)

Department of the Treasury - Internal Revenue Service

(Rev. January 1991)

# Notice of Federal Tax Lien Under Internal Revenue Laws

District

Cincinnati, OH

Serial Number

319108075

For Optional Use by Recording Office

109843

As provided by sections 6321, 6322, and 6323 of the Internal Revenue Code, notice is given that taxes (including interest and penalties) have been assessed against the following-named taxpayer. Demand for payment of this liability has been made, but it remains unpaid. Therefore, there is a lien, in favor of the United States on all property and rights to property belonging to this taxpayer for the amount of these taxes, and additional penalties, interest, and costs that may accrue.

3

RECORDED  
1991 MAY 20 AM 10:15  
KNOX COUNTY, OHIO  
FILED  
VOL. \_\_\_\_\_ PAGE \_\_\_\_\_  
GERALD LAYTON, RECORDER

Name of Taxpayer THOMAS F COLLIER  
DBA BIG T CLEANERS

Residence PO BOX 767  
MT VERNON, OH 43050-0767

**IMPORTANT RELEASE INFORMATION:** With respect to each assessment listed below, unless notice of lien is refiled by the date given in column (e), this notice shall, on the day following such date, operate as a certificate of release as defined in IRC 6325(a).

Kind of Tax (a)	Tax Period Ended (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)
941	03/31/89	31-1195798	01/01/90	01/31/00	623.46
941	06/30/89	31-1195798	09/18/89	10/18/99	579.78
941	12/31/90	31-1195798	03/04/91	04/03/01	376.39
940	12/31/89	31-1195798	02/04/91	03/06/01	54.99

Place of Filing

COUNTY RECORDER  
KNOX COUNTY  
MT. VERNON, OH 43050

Total \$

1834.62

This notice was prepared and signed at Cincinnati, OH on this,

the 12th day of May 19 91

Signature

for JOHN R. SMITH

ACS

Title

BRANCH CHIEF  
31-01-0000

(NOTE: Certificate of officer authorized by law to take acknowledgments is not essential to the validity of Notice of Federal Tax Lien Rev. Rul. 71-466, 1971 - 2 C.B. 409)

Form 668

Blumberg No. 5206

EXHIBIT

2

109782

Form 668 (Y)

Department of the Treasury - Internal Revenue Service

(Rev. 7-89)

# Notice of Federal Tax Lien Under Internal Revenue Laws

District

Serial Number

For Optional Use by Recording Office

Cincinnati, OH

319106319

As provided by sections 6321, 6322, and 6323 of the Internal Revenue Code, notice is given that taxes (including interest and penalties) have been assessed against the following-named taxpayer. Demand for payment of this liability has been made, but it remains unpaid. Therefore, there is a lien in favor of the United States on all property and rights to property belonging to this taxpayer for the amount of these taxes, and additional penalties, interest, and costs that may accrue.

KNOX COUNTY OFFICE  
Filed at 10:15 o'clock A m.

APR 29 1991

Name of Taxpayer

THOMAS F COLLIER  
102 COTTAGE ST

RECORDED.

VOL. \_\_\_\_\_ PAGE \_\_\_\_\_  
GERALD LAYMON, RECORDER  
3.03

Residence

PO. BOX 767  
MT VERNON, OH 43050-0767

IMPORTANT RELEASE INFORMATION: With respect to each assessment listed below, unless notice of lien is refiled by the date given in column (e), this notice shall, on the day following such date, operate as a certificate of release as defined in IRC 6325(a).

Kind of Tax (a)	Tax Period Ended (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)
1040	12/31/88	302-68-2037	07/17/89	08/16/99	1714.93
1040	12/31/89	302-68-2037	05/28/90	06/27/00	7946.61
Total					\$ 9661.54

Place of Filing

COUNTY RECORDER  
KNOX COUNTY  
MT. VERNON, OH 43050

This notice was prepared and signed at Cincinnati, OH, on this,

the 15th day of April, 19 91

Signature

Title

for JOHN R. SMITH ACS

BRANCH CHIEF  
31-01-0000

(NOTE: Certificate of officer authorized by law to take acknowledgments is not essential to the validity of Notice of Federal Tax lien Rev. Rul. 71-466, 1971 - 2 C.B. 409)

Form 668 (Y) (R)

Blumberg No. 5208

EXHIBIT

3

Part 1 - Sent By Recording Office

116072 5<sup>00</sup>

Form 668 (Y) (c)  
(Rev. August 1997)

369

Department of the Treasury - Internal Revenue Service

### Notice of Federal Tax Lien

District

OHIO

Serial Number

319865075

For Optional Use by Recording Office

As provided by sections 6321, 6322, and 6323 of the Internal Revenue Code, we are giving a notice that taxes (including interest and penalties) have been assessed against the following-named taxpayer. We have made a demand for payment of this liability, but it remains unpaid. Therefore, there is a lien in favor of the United States on all property and rights to property belonging to this taxpayer for the amount of these taxes, and additional penalties, interest, and costs that may accrue.

Name of Taxpayer **THOMAS F & DIANNE COLLIER**

Residence **PO BOX 306  
GAMBIER, OH 43022-0306**

**IMPORTANT RELEASE INFORMATION:** For each assessment listed below, unless notice of lien is refilled by the date given in column (e), this notice shall, on the day following such date, operate as a certificate of release as defined in IRC 6325(a).

RECORDED PAGE  
VOL. 17947087  
JOHN H. 17947087  
RECORDER  
98 JUL 22 PM 2:09  
KNOX COUNTY, OHIO  
FILED

Kind of Tax (a)	Tax Period Ended (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)
1040	12/31/1996	302-68-2037	12/08/1997	01/07/2008	952.03

Place of Filing

COUNTY RECORDER  
KNOX COUNTY  
MT. VERNON, OH 43050

Total

\$

952.03

This notice was prepared and signed at Cincinnati, OH, on this,

the 30th day of June, 1998

Signature

*Joseph W. Sprigg*  
for RICHARD SPRIGG, ACS

Title

BRANCH CHIEF 31-01-0000

(NOTE: Certificate of officer authorized by law to take acknowledgments is not essential to the validity of Notice of Federal Tax Lien Rev. Rul. 71-466, 1971-2 C

PART 1 - KERT BY RECORDING OFFICE

Form 668 (Y) (c)  
CAT. NO 80025X

Number 668

EXHIBIT

4

Department of the Treasury - Internal Revenue Service  
**Certificate of Release of Federal Tax Lien**

District OHIO Serial Number 319108075 For Use by Recording Office

I certify that the following-named taxpayer, under the requirements of section 6325 (a) of the Internal Revenue Code has satisfied the taxes listed below and all statutory additions. Therefore, the lien provided by Code section 6321 for these taxes and additions has been released. The proper officer in the office where the notice of internal revenue tax lien was filed on May 20, 1991, is authorized to note the books to show the release of this lien for these taxes and additions.

117606 3

Name of Taxpayer THOMAS F COLLIER  
DBA BIG T CLEANERS

Residence PO BOX 767  
MT VERNON, OH 43050-0767

RECORDED  
VOL PAGE  
JOHN E. LEANER  
RECORDER  
00 SEP 18 PM 2:28  
KNOX COUNTY, OHIO  
FILED

COURT RECORDING INFORMATION:

Liber Page UCC No. Serial No.  
n/a n/a n/a n/a

Kind of Tax (a)	Tax Period Ended (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)
940	12/31/1989	31-1195798	02/04/1991	03/06/2001	54.99
941	03/31/1989	31-1195798	01/01/1990	01/31/2000	823.46
941	06/30/1989	31-1195798	09/18/1989	10/18/1999	579.78
941	12/31/1990	31-1195798	03/04/1991	04/03/2001	376.39
*****					

Place of Filing COUNTY RECORDER  
KNOX COUNTY  
MT. VERNON, OH 43050 Total \$ 1834.62

This notice was prepared and signed at Cincinnati, OH, on this, the 07th day of September, 2000.

Signature [Signature] Title Chief, SPf

(NOTE) Certificate of officer authorized by law to take acknowledgments is not essential to the validity of Certificate of Release of Federal Tax lien Rev. Ru

Blumberg No. 5208  
EXHIBIT  
5  
CAT NO 600261

Department of the Treasury - Internal Revenue Service  
**Certificate of Release of Federal Tax Lien**

District <b>OHIO</b>	Serial Number <b>319106319</b>	For Use by Recording Office
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I certify that the following-named taxpayer, under the requirements of section 6325 (a) of the Internal Revenue Code has satisfied the taxes listed below and all statutory additions. Therefore, the lien provided by Code section 6321 for these taxes and additions has been released. The proper officer in the office where the notice of internal revenue tax lien was filed on April 29 1991, is authorized to note the books to show the release of this lien for these taxes and additions.

**117562**

Name of Taxpayer  
**THOMAS F COLLIER  
102 COTTAGE ST**

**KNOX COUNTY OHIO**  
Filed at 3:42 o'clock P. m.

Residence  
**PO BOX 767  
MT VERNON, OH 43050-0767**

**AUG 24 2000**

RECORDED.  
VOL. \_\_\_\_\_ PAGE \_\_\_\_\_  
JOHN B. LYBARGER, RECORDER

**COURT RECORDING INFORMATION:**

Liber Page UCC No. Serial No.  
n/a n/a n/a n/a

Kind of Tax (a)	Tax Period Ended (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)
1040	12/31/1988	302-68-2037	07/17/1989	08/16/1999	1714.93
1040	12/31/1989	302-68-2037	05/28/1990	06/27/2000	7946.61
*****					

Place of Filing <b>COUNTY RECORDER KNOX COUNTY MT. VERNON, OH 43050</b>	<b>Total</b>	<b>\$ 9661.54</b>
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This notice was prepared and signed at Cincinnati, OH, on this, 24th day of August 2000

Signature \_\_\_\_\_ Title **Chief, SPf**



(NOTE) Certificate of officer authorized by law to take acknowledgments is not essential to the validity of Certificate of Release of Federal Tax Lien Rev.

117589<sup>3.00</sup>

Form 668(Z)  
(Rev. 10-1999)

308

Department of the Treasury - Internal Revenue Service  
**Certificate of Release of Federal Tax Lien**

District  
OHIO

Serial Number  
319865075

For Use by Recording Office

I certify that the following-named taxpayer, under the requirements of section 6325 (a) of the Internal Revenue Code has satisfied the taxes listed below and all statutory additions. Therefore, the lien provided by Code section 6321 for these taxes and additions has been released. The proper officer in the office where the notice of internal revenue tax lien was filed on \_\_\_\_\_, \_\_\_\_\_, is authorized to note the books to show the release of this lien for these taxes and additions.

Name of Taxpayer THOMAS F & DIANNE COLLIER

Residence PD BOX 306  
GAMBIER, OH 43022-0306

RECORDED  
PAGE 1  
VOL JOHN B. YEAGER  
RECORDER  
00 SEP -7 PM 1:34  
KNOX COUNTY, OHIO  
FILED

COURT RECORDING INFORMATION:

Liber Page UCC No. Serial No.  
n/a n/a n/a 116072

Kind of Tax (a)	Tax Period Ended (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)
1040	12/31/1996	302-68-2037	12/06/1997	01/07/2008	952.03
*****					

Place of Filing COUNTY RECORDER KNOX COUNTY MT. VERNON, OH 43050	Total	\$ 952.03
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Cincinnati, OH

This notice was prepared and signed at \_\_\_\_\_, on this, 30th day of August 2000

Signature

Title Chief, SPf

(NOTE): Certificate of officer authorized by law to take acknowledgments is not essential to the validity of Certificate of Release of Federal Tax lien Rev. Rul. 79-404, 1979-2 CB 308

PART 1 - RECORDING OFFICE

EXHIBIT  
7

**Low taxes...less spending...  
a stronger economy...the choice is clear!**

**KRIS JORDAN...A PROVEN FISCAL CONSERVATIVE!**



- 100% voting record against tax hikes.
- Cut property taxes while balancing the budget.
- Authored legislation to cut wasteful spending.
- Voted against Ted Strickland's tax increase, and opposed excessive borrowing and spending that is bankrupting our children's future.

**Kris  
Jordan**  
For State Senate

**Taxin' Thom Collier**



- Voted to RAISE SALES TAXES**  
Item 100, HB 51, 120th Gen. Ass.
- Voted to create NEW COMMERCIAL ACTIVITY TAX**  
Item 100, HB 51, 120th Gen. Ass.
- Voted to RAISE GASOLINE TAXES**  
Item 100, HB 51, 120th Gen. Ass.
- But didn't pay his own taxes!**
- Federal Tax Lien, Serial #319106315**  
Item 100, HB 51, 120th Gen. Ass.
- Federal Tax Lien, Serial #319108075**  
Item 100, HB 51, 120th Gen. Ass.
- Federal Tax Lien, Serial #319865075**  
Item 100, HB 51, 120th Gen. Ass.
- State Tax Lien, Case #08C111-1287**  
Item 100, HB 51, 120th Gen. Ass.

PRECIPE

DATE 11-15-08  
COURT OF COMMON PLEAS OF KNOX COUNTY

STATE OF OHIO  
DEPARTMENT OF TAXATION

MARY JO HAWKINS  
KNOX COUNTY CLERK OF COURT  
117 E HIGH ST 2ND FL #201  
MOUNT VERNON, OH 43050

PLAINTIFF

VS.

COLLIER THOMAS F  
DBA TC & A STORAGE  
406 W GAMBIER ST

TAX TYPE: SALES TAX

CRN: 7080207586

MOUNT VERNON, OH 43050-2318

ACCOUNT NO.: 7424925

DEFENDANT

THE AFOREMENTIONED ASSESSMENT HAS BECOME FINAL BY OPERATION OF LAW FOR THE PURPOSES OF HAVING A JUDGMENT LIEN RECORDED THEREON.

TO THE CLERK OF COMMON PLEAS COURT:

ENTER JUDGMENT AND RECORD  
CERTIFICATE OF JUDGMENT. RETAIN  
ONE COPY AND RETURN ONE COPY TO THE  
OFFICE OF THE ATTORNEY GENERAL

JUDGMENT RECORDED ON:

DATE: 11-26-08

AMOUNT \$ 155.15

CASE NO.: 08CJ11-1287

DOCKET: 664

PAGE: 48

I hereby certify the foregoing to be a true and correct copy of the action of the Tax Commissioner taken this date with respect to the above matter.

*Richard A. Levin*

Richard A. Levin  
Tax Commissioner

LT450/7424925

FILED  
KNOX COUNTY  
COURT OF COMMON PLEAS  
2008 NOV 26 AM 10:23  
MARY JO HAWKINS  
CLERK OF COURTS



A 7 4 2 4 9 2 5 C 4 2 D 2 0 0 8 1 1 5 C





RICHARD CORDRAY  
OHIO ATTORNEY GENERAL

September 4, 2009

CRN: 7080207586

Account No. 7424925

IN THE COMMON PLEAS COURT, KNOX COUNTY, OHIO

STATE OF OHIO

TAX JUDGMENT

Plaintiff,

- DOCKET 66
- PAGE 48
- CASE 08CJ11-1287
- ENTERED 11-26-08

vs.

COLLIER THOMAS F  
DBA TC & A STORAGE  
406 W GAMBIER ST

MOUNT VERNON OH 43050-2318

Defendant.

FILED  
KNOX COUNTY  
COURT OF COMMON PLEAS  
2009 SEP 23 PM 3:06  
MARY JO HAWKINS  
CLERK OF COURTS

RELEASE AND SATISFACTION OF JUDGMENT

The above tax judgment having been settled, cancelled and/or satisfied, the same is hereby discharged upon payment of the court costs by the defendant to the Clerk of Courts. The Clerk is hereby authorized to enter satisfaction of said judgment on the records.

DEPARTMENT OF TAXATION

*Darla Reardon*

Darla Reardon  
Section Chief

TXRLS/7424925



Revenue Recovery/Collections Enforcement  
150 East Gay Street 21<sup>st</sup> FL • Columbus, Ohio 43215 • PHONE 614.466.8360 • FAX 614.752.9070 • [www.ag.state.oh.us](http://www.ag.state.oh.us)

EXHIBIT  
10  
Blumberg No. 5208