

SWORN COMPLAINT

Tennessee Ethics Commission

→ This form must be used to report alleged violations of any law within the jurisdiction of the Tennessee Ethics Commission. Please see the attached Instructions before completing this form (failure to complete the form properly may result in immediate dismissal of the complaint pursuant to T.C.A. §3-6-203(a)).

PART I	IDENTIFYING INFORMATION
1. Complainant	
a.	Name (first name, initial, and last name) <i>Robert Stephen Butler, Sr. "Steve"</i>
b.	Mailing or street address (room, apt., suite no. and street, or P.O. box) <i>17425 Highway 194</i>
c.	City, state, zip code <i>Somerville, TN 38068</i>
d.	Telephone <i>(901) 466-1172</i>
e.	E-mail (if available) <i>butler1a@bellsouth.net</i>
2. Alleged Violator(s)	
a.	First and last name of each alleged violator <i>Attachment</i>
b.	List the Position or Title of each alleged violator <i>Attachment</i>
c.	
Mailing or street address of each alleged violator	

PART II	STATEMENT OF JURISDICTION
1. Provide a short and plain statement of the nature of the violation(s).	
<i>Attachment</i>	
2. List each law or rule (providing the specific citation, if known) allegedly violated.	
<i>Attachment</i>	

PART III STATEMENT OF FACTS

State all facts that constitute each alleged violation. State the dates upon which (or the time period within which) each violation allegedly occurred. Attach additional sheets as needed, signing and numbering each page...

Attachment

Initial Here If Any Additional Pages Are Attached _____

PART IV	SUPPORTING DOCUMENTATION								
<p>1. List all documents and other materials in your possession that are relevant to this complaint.</p> <p style="font-size: 1.2em; margin-left: 20px;"><i>Attachment</i></p> <p style="text-align: center; margin-top: 10px;"><i>Initial Here If the Documents Are Attached to this Sworn Complaint form: _____</i></p>									
<p>2. List all documents and other materials relevant to this complaint that are available to you, but are not currently in your possession. State the last known location of the document or material.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:50%;">Document/Material</th> <th style="width:50%;">Location</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>		Document/Material	Location						
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PART V	AFFIDAVIT
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By my signature below I attest to the following:

- I understand that, pursuant to T.C.A. §3-6-208, submitting a complaint containing false information, or submitting a complaint in reckless disregard of the truth or falsity of the information contained therein, constitutes a Class 2 Offense which may subject me to civil penalties in an amount up to ten thousand dollars (\$10,000) and may additionally subject me to liability for the reasonable costs and attorney fees of the falsely accused;
- The information contained in this complaint, and any supporting documentation or materials referenced herein or submitted herewith, is true and correct to the best of my knowledge, information and belief.

Paul A. Benth, Jr.

 Signature of Complainant

October 20, 2008

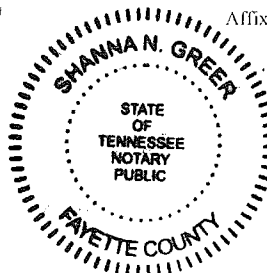
 Date

Sworn to and subscribed before me this *20th* day of *Oct.* in *Fayette* county, Tennessee:

Shanna M Greer Dec. 8, 2010

 Signature of Notary

 Notary Registration No.



- 2
 - a. Dolores R. Gresham
 - b. Member of the TN House of Representatives, District 94
 - c. 3515 Country Club Road
Somerville, TN 38068

Part II

1. While serving as a member of the General Assembly, Rep. Dolores Gresham misused her public office for personal financial gain.
2. Tenn. Code. Ann. 3-6-207 provides that:
[n]otwithstanding the provisions of 3-6-203, if the commission determines that probable cause exists to believe that a member of the general assembly has committed an act constituting misuse of office for personal financial gain, then, except as otherwise provided in 3-6-306(a)(3), no civil penalty shall be imposed and the commission shall instead report its determination and findings to the ethics committee of the appropriate house of the general assembly.

Part III

While serving in the Tennessee House of Representatives and on the Tennessee House Agricultural Committee from 2006 until 2008, Rep. Gresham increased her personal wealth by \$26,850.00 by voting in favor of tax-payer funded farm grants that directly benefited her husband's farm, Gresham Farms. There is no legislative record providing that Rep. Gresham disclosed this conflict of interest.

The grants are known as the Tennessee Agricultural Enhancement Program (TAEP). Gresham Farms was the largest recipient of Agricultural Enhancement Grants in Fayette County (*Commercial Appeal*, 10/11/2008).

On February 6, 2007, while serving on the House Agricultural Committee, Rep. Gresham spoke in favor of the TAEP in a review by Agriculture Commissioner Ken Givens after its first year of service. Gresham said, "[The program] is obviously an investment in our future. It's an economic development tool." Rep. Gresham spoke in support of the TAEP while withholding the fact that her husband's farm was a beneficiary (ibid).

From 2006-2007, Gresham Farms received \$3,500.00 for a hay storage barn, \$850.00 for a cattle squeeze chute and a single animal scale (ibid).

On June 11, 2007, Rep. Gresham voted for the annual budget (SB2334/HB2353), which included funding for the TAEP. There is no legislative record indicating that she disclosed her interest (ibid).

From 2007-2008, Gresham Farms received \$15,000.00 for a commodity storage shed, \$3,500.00 for a hay storage barn, \$3,500.00 for livestock handling equipment, and \$500.00 for feeder cattle incentive (ibid).

On May 21, 2008, Rep. Gresham voted for the annual budget (SB4213/HB4219), which included funding for the TAEP. There is no legislative record she disclosed her interest (ibid).

On May 25, 2008, Rep. Gresham voted for the annual budget (SB3914/ HB4025), which included funding for the TAEP. There is no legislative record she disclosed her interest (ibid)

From 2008-2009, Gresham Farms was approved for \$4,340.00 for a hay storage barn, \$3,500.00 for livestock equipment, \$1,200.00 for cattle genetics (ibid).

Part IV

1. The Commercial Appeal, *Rep. Gresham's spouse wins grants: Husband lands \$35,890.00 for farm*, by Richard Locker, October 11, 2008.