

**BEFORE THE CITY OF MAYSVILLE ETHICS BOARD
STATE OF GEORGIA**

COMPLAINT AGAINST COUNCILMEMBER STEVE BOSWELL

1. Name and address of person filing the complaint _____
2. Name and address of the party against whom the complaint is being filed.
City of Maysville Councilmember Steve Boswell

**FORMAL COMPLAINT OF OFFICIAL MISCONDUCT, OATH BREACH, ABUSE OF POWER,
AND SUBVERSION OF CONSTITUTIONAL GOVERNANCE**

TO: * The City of Maysville Ethics Board & City Clerk

- Georgia Government Transparency and Campaign Finance Commission (O.C.G.A. § 21-5-1 et seq.)
- City Council & Municipal Governance Review Board
- Georgia Municipal Association
- Attorney General Chris Carr

DATE: _____

I. PRELIMINARY STATEMENT

This unified complaint is formally submitted regarding a systematic pattern of official misconduct, political collusion, executive manipulation, unauthorized abuse of law enforcement authority, explicit repudiation of the constitutional framework, and breach of the statutory Oath of Office by City of Maysville Councilmember Steve Boswell (Ward 1).

Public admissions by Councilmember Boswell on media broadcasts (*Blind Squirrel Talk* podcast) and during official city council meetings confirm that he was hand-picked and recruited to serve as a compliant voting block for Mayor Richard Presley, effectively destroying the legislative independence required by municipal governance. Furthermore, Councilmember Boswell has been video-recorded explicitly declaring to local citizens that he "*doesn't care what the Constitution says*" and "*doesn't live by the law & the Constitution.*" When combined with documented instances of attempting to unlawfully command municipal police to remove peaceful citizens, publicly taunting constituents regarding a pre-determined voting majority ("*3 is greater than 2*"), dismissing public health concerns (clean water infrastructure) with contempt ("*act better*"), and failing to adhere to public records mandates, Councilmember Boswell's conduct constitutes malfeasance, misfeasance, and a total forfeiture of his official duties under the City of Maysville Charter (Act No. 190, § 2.14), the City of Maysville Code of Ethics (Ordinance No. 2006-001), O.C.G.A. § 21-5-1 et seq., and O.C.G.A. § 45-11-4. Immediate formal investigation and removal from office are requested.

II. PARTIES & JURISDICTION

1. **Jurisdiction:** The City of Maysville Ethics Board, City Council, and the State of Georgia possess jurisdiction over this matter pursuant to:

City of Maysville Charter (Act No. 190 / H.B. 588): Sections 2.12, 2.14, and 2.15 .

City of Maysville Code of Ethics: Ordinance No. 2006-001.

Georgia Ethics in Government Act: O.C.G.A. § 21-5-1 et seq.

Georgia Official Code: O.C.G.A. § 45-11-4 (Malfeasance), § 45-3-1 (Oath), § 16-10-1 (Oath Violation), § 50-14-1 (Open Meetings Act), and § 50-18-70 (Open Records Act).

II-A. FORMAL DEMAND FOR RECUSAL AND INDEPENDENT ETHICS PANEL

(City Charter § 2.14(a)–(b); Constitutional Administrative Due Process)

Pursuant to Section 2.14(b) of the City Charter and fundamental principles of administrative due process, Complainant formally demands that **Respondent Steve Boswell, Mayor Richard Presley, and Councilmember Parr** recuse themselves immediately from any administrative oversight, appointment of ethics panel members, or voting regarding this complaint. Because this complaint documents an explicit, self-admitted three-member voting alliance ("*three stooges / three amigos / three butt-buddies*"), allowing these named subject officials to participate in selecting the hearing panel or adjudicating these claims would create a fatal conflict of interest and render any resulting determination legally void. An independent, unaligned hearing officer or neutral panel must be designated.

III. STATEMENT OF FACTS & SPECIFIC COUNTS

COUNT 1: EXPLICIT REPUDIATION OF THE CONSTITUTION AND VIOLATION OF OATH OF OFFICE

(Legal Grounds: O.C.G.A. § 16-10-1; O.C.G.A. § 45-3-1; O.C.G.A. § 45-11-4; City Charter § 2.12 & § 2.14)

1. **Mandatory Oath of Office:** Every municipal officer in the State of Georgia is statutory and constitutionally required under O.C.G.A. § 45-3-1 and the Maysville City Charter to take a solemn oath to support and defend the Constitution of the United States and the Constitution of the State of Georgia.
2. **Video-Recorded Repudiation:** On recorded video, Councilmember Steve Boswell explicitly declared to two local citizens that he:
"doesn't care what the constitution says" and further declared that he **"doesn't live by the law & the constitution."**

3. **Legal Analysis & Malfeasance:** An elected public official holding legislative power over citizens cannot legally or ethically exercise state-delegated authority while openly renouncing the constitutional and statutory framework that creates and limits that power. Under O.C.G.A. § 16-10-1 (Violation of Oath by Public Officer), willfully violating the terms of an official oath constitutes a felony-level breach of public office. Boswell's open disavowal violates his fiduciary duties under Charter Section 2.14(a) and renders him legally and ethically unfit to pass ordinances, regulate public funds, or administer public trust.

COUNT 2: ORCHESTRATED CANDIDATE RECRUITMENT, CAMPAIGN FINANCE DISCLOSURE BREACHES, AND SUBVERSION OF LEGISLATIVE INDEPENDENCE

(Legal Grounds: O.C.G.A. § 21-5-1 et seq.; City Charter § 2.14(a) & (b); Georgia Open Meetings Act O.C.G.A. § 50-14-1)

1. **Public Admission of Executive Recruitment:** In a recorded episode of the *Blind Squirrel Talk* podcast, Councilmember Boswell publicly admitted that he did not independently seek office on a platform of constituent service, but was specifically recruited and asked to run for the Maysville City Council. Multiple citizens allege this candidacy was engineered by Mayor Richard Presley to secure a guaranteed "yes vote" to consolidate executive control.
2. **Applicability under O.C.G.A. § 21-5-1 et seq.:** Under the Georgia Ethics in Government Act (O.C.G.A. § 21-5-30 and § 21-5-50), all candidates and public officers are subject to strict campaign contribution disclosure and financial independence standards. Engineering candidacies through coordinated executive backing without proper campaign finance accounting or disclosure violates state ethics standards.
3. **Admissions of Pre-Determined Factional Voting:** During the July 30, 2026 City Council meeting, Councilmember Boswell publicly confirmed his political alliance with the Mayor and boasted of a pre-determined voting bloc. On official video record, Councilmember Boswell made the following direct statements:
 - Addressing his political alliance:

"The relationship between me and Mr. Presley or Mr. Parr. You're damn right we are friends. We're very close friends. I'm not going to apologize for being a friend to him. I'm proud he calls me a friend."

- Taunting constituents and council colleagues regarding the voting split:

"Let me explain something to everyone in here. You're right. There's three stooges. Three amigos. Three butt-buddies. I don't care what you want to call it. I don't care what you what to call it but that's three. Remember that number Three."

"Three's the magic number"

"If you want a number 3 is greater than 2 if ya'll want to complain."

4. **Violation of Fiduciary Trustee Duty:** Charter Section 2.14(a) mandates that elected officers act as trustees for all residents. Boasting of a fixed voting alliance ("3 is greater than 2") demonstrates a refusal to independently deliberate and raises legal implications under O.C.G.A. § 50-14-1 regarding illegal pre-meeting agreements or "rolling quorums."

COUNT 3: UNILATERAL ABUSE OF AUTHORITY & ATTEMPTED SUPPRESSION OF CONSTITUENT SPEECH

(Legal Grounds: City Charter § 2.14 & § 3.10; Georgia Open Meetings Act O.C.G.A. § 50-14-1; First Amendment Rights)

1. **Unlawful Directives to Police:** During an official public meeting of the Maysville City Council, Councilmember Boswell unilaterally took it upon himself to issue orders directly to Chief of Police Doug Anderson, commanding law enforcement to forcibly remove a citizen from the council chambers.
2. **Lack of Threat & Excess of Authority:** The citizen in question posed no physical threat or lawful justification for ejection.
3. **Legal Analysis:** Under the City Charter (§ 3.10), executive and administrative authority over police personnel rests solely with the executive branch/presiding officer, not individual councilmembers. An individual ward councilmember possesses zero administrative authority over law enforcement. Attempting to deploy municipal police power to silence a constituent violates the Open Meetings Act (O.C.G.A. § 50-14-1) and constitutes an abuse of official position under the City Ethics Ordinance.

COUNT 4: UNPROFESSIONAL CONDUCT, ADMISSION OF INCOMPETENCE, AND CONTEMPT TOWARD CONSTITUENTS

(Legal Grounds: City Code of Ethics Ordinance No. 2006-001; City Charter § 2.14(a); O.C.G.A. § 45-11-4)

1. **Admission of Incompetence:** During the July 30, 2026 public council meeting, Councilmember Boswell openly admitted to the public that he lacks the basic knowledge required to fulfill his statutory duties, stating on record:

"i never been a city council. I know nothing about municipal government and how it's run and all the things. It's really hard."

2. **Hostility Toward Public Health Concerns:** During the same meeting, when a local resident and taxpayer raised critical concerns regarding municipal infrastructure and requested clean drinking water, Councilmember Boswell dismissively and contemptuously replied:

"Well act better, people need to have more respect."

3. **Violation of Ethical Standards:** City Charter Section 2.14(a) and the City Code of Ethics (Ordinance 2006-001) require elected officials to preserve public confidence and treat all citizens with courtesy, dignity, and respect. Dismissing taxpaying citizens pleading for clean water infrastructure with personal contempt constitutes misfeasance and malfeasance in office under O.C.G.A. § 45-11-4.

COUNT 5: ABDICATION OF STATUTORY DDA DUTIES AND VIOLATION OF COMPREHENSIVE PLAN GOALS

(Legal Grounds: O.C.G.A. § 36-42-2 et seq. (Georgia Downtown Development Authorities Law); City of Maysville 2024 Comprehensive Plan (Economic Development & Downtown Revitalization Element); City Charter § 2.14(a); City Code of Ethics Ordinance No. 2006-001)

1. Official Capacity and Liaison Designation

Respondent Councilmember Steve Boswell serves as the official City Council Liaison to the City of Maysville Downtown Development Authority (DDA). In this capacity, Respondent is tasked with providing legislative oversight, policy direction, and municipal alignment between the City Council and the DDA to execute downtown economic development strategies.

2. Statutory Purpose Under Georgia Law (O.C.G.A. § 36-42-2)

Under the Georgia Downtown Development Authorities Law (O.C.G.A. § 36-42-2), the General Assembly explicitly defines the mandatory public purpose of DDAs as:

"The revitalization and redevelopment of the central business districts... to develop and promote for the public good and general welfare trade, commerce, industry, and employment opportunities... by creating a climate favorable to the location of new industry, trade, and commerce."

Statutory powers under O.C.G.A. § 36-42-8 are specifically granted for capital projects, real property acquisition, structural renovation, commercial financing, economic incentives, and business recruitment—**not** for acting as a municipal social committee or event planning body.

3. Direct Violation of the City of Maysville Comprehensive Plan

The City of Maysville 2024 Comprehensive Plan explicitly establishes economic growth targets, land use policies, and revitalization priorities for the central business district. Specifically, the Comprehensive Plan mandates:

- **Commercial & Physical Revitalization:** Actively recruiting businesses, expanding the commercial tax base, addressing vacant/blighted downtown properties, and upgrading public infrastructure.
- **Economic Development Strategies:** Utilizing DDA statutory mechanisms to foster long-term commercial trade, job creation, and downtown capital investments.

Under Respondent Boswell's oversight as Council Liaison, the DDA has completely abdicated its core statutory mandates. Rather than pursuing capital projects, business recruitment, façade grants, or downtown structural redevelopment as required by the Comprehensive Plan, the DDA's operations under Respondent's guidance have been reduced exclusively to organizing local community events and social activities.

4. Legal & Ethical Analysis (Malfeasance and Fiduciary Breach)

- **Breach of Fiduciary Capacity (Charter § 2.14(a)):** City Charter Section 2.14(a) mandates that elected officials serve as *"trustees and servants of the residents... and shall act in a fiduciary capacity for the benefit of such residents."* Misdirecting DDA oversight away from economic revitalization and downtown commercial development into superficial event management constitutes a failure of fiduciary duty to taxpayers who fund municipal development.
- **Misfeasance in Office (O.C.G.A. § 45-11-4):** Misusing a council liaison appointment to facilitate the total deviation from both state statutory purpose (O.C.G.A. § 36-42-2) and the City's adopted Comprehensive Plan constitutes misfeasance and failure to faithfully discharge official municipal obligations.

COUNT 6: WILLFUL DISREGARD OF LAND USE POLICIES AND BREACH OF FIDUCIARY DUTY (DATA CENTER MORATORIUM VOTE)

(Legal Grounds: City of Maysville Comprehensive Plan, p. 27; City Charter § 2.14(a); City Code of Ethics Ordinance No. 2006-001; O.C.G.A. § 45-11-4)

1. Factual Background & Incident

On July 16, 2026, the Maysville City Council convened to vote on a temporary moratorium regarding data center developments. The explicit purpose of the proposed moratorium was to temporarily pause high-impact industrial data center applications to allow the City sufficient time to review, modernize, and update its Land Use Management Code.

Despite clear warnings regarding the environmental, infrastructure, power, and water demands posed by utility-scale data centers, Councilmember Steve Boswell cast a

negative vote ("NO"), seeking to block the temporary moratorium and allow unregulated development without updated land use protections.

2. Direct Conflict with Page 27 of the Adopted Comprehensive Plan

Page 27 of the City of Maysville Comprehensive Plan specifically governs the **Land Use Management Code & Growth Policies**. Under Page 27 of the adopted plan, the City is legally and policy-bound to:

- **Maintain Orderly Development Standards:** Proactively update and enforce land development ordinances prior to permitting heavy industrial or high-utility land uses.
- **Protect Municipal Infrastructure & Public Resources:** Ensure that large-scale commercial/industrial developments do not overwhelm municipal infrastructure (including power, water, and local emergency services).
- **Ensure Regulatory Consistency:** Align council voting decisions with the long-term land use goals and character protections articulated in the Comprehensive Plan.

By voting "NO" on July 16, 2026, against a necessary pause to update the Land Use Management Code, Councilmember Boswell directly subverted the express mandates set forth on Page 27 of the Comprehensive Plan.

3. Ethics Violations & Legal Analysis

Violation of Trustee & Fiduciary Duty (City Charter § 2.14(a)): Under Section 2.14(a) of the Maysville City Charter, elected officials are *"trustees and servants of the residents of the city and shall act in a fiduciary capacity for the benefit of such residents."* Voting against reasonable land use protections to accommodate unmonitored development directly breaches this statutory fiduciary obligation.

- **Violation of Code of Ethics (Ordinance No. 2006-001):** The City Code of Ethics requires councilmembers to uphold officially adopted city plans, protect public resources, and avoid taking actions that compromise public health, safety, and orderly municipal planning.
- **Misfeasance in Office (O.C.G.A. § 45-11-4):** Knowingly voting to bypass or undermine the Land Use Management Code review process in direct contradiction to Page 27 of the adopted Comprehensive Plan constitutes misfeasance—performing a public duty in an improper, negligent, or unlawful manner that puts community resources at risk.

IV. RELIEF REQUESTED

Wherefore, the Complainant respectfully requests that the City of Maysville Ethics Board, City Council, and state oversight authorities grant the following relief:

1. **Initiate Formal Evidentiary Investigation:** Convene an immediate inquiry pursuant to City Charter Section 2.15 and Ordinance No. 2006-001.
2. **Issue Public Reprimand and Censure:** Issue formal written findings declaring Councilmember Steve Boswell in violation of the City Code of Ethics , City Charter , and state law.
3. **Referral to State Commissions & Prosecutors:** Refer the video-documented repudiation of the Constitutional Oath (O.C.G.A. § 16-10-1) to the Piedmont Judicial Circuit District Attorney, and refer candidate recruitment and financial disclosure matters to the Georgia Government Transparency and Campaign Finance Commission (O.C.G.A. § 21-5-1 et seq.).
4. **Issue specific findings:** that Respondent's July 16, 2026 vote against the data center moratorium violated Page 27 of the Comprehensive Plan, breached his fiduciary duty under Charter § 2.14(a), and demonstrated a failure to protect city infrastructure and land management standards.
5. **Statutory Authority:** Under O.C.G.A. § 50-14-6, any person who knowingly and willfully conducts or participates in a meeting in violation of the Open Meetings Act (including attempting to unlawfully eject citizens or conducting serial/rolling quorums to pre-determine votes outside noticed meetings) is guilty of a misdemeanor punishable by fines up to \$1,000.
6. **Removal / Forfeiture of Office:** Issue a determination of forfeiture of office pursuant to City Charter Section 2.14(h) and O.C.G.A. § 45-11-4 for malfeasance and total breach of public trust.

V. SUPPORTING EXHIBITS & ATTACHMENTS – Exhibits will be delivered to the Ethics Committee Chairperson once established.

- **Exhibit A:** Audio/Video recording of the *Blind Squirrel Talk* podcast featuring Councilmember Steve Boswell discussing his candidate recruitment.
- **Exhibit B:** Official video recording and of the July 30, 2026 City Council Meeting containing verbatim quotes ("*three stooges*", "*three amigos*", "*three butt-buddies*", "*3 is greater than 2*", "*act better*").
- **Exhibit C:** Video-recorded statement documenting Councilmember Boswell declaring that he "*doesn't care what the constitution says*" and "*doesn't live by the law & the constitution.*"
- **Exhibit D:** Open Records Request log and non-compliance documentation under O.C.G.A. § 50-18-70.

- **Exhibit E:** City of Maysville 2024 Comprehensive Plan (Economic Development and Downtown Revitalization Elements).
- **Exhibit F:** Official DDA Meeting Minutes and Agendas under Liaison Steve Boswell, demonstrating a lack of commercial development/capital redevelopment projects and focus solely on social event management.
- **Exhibit H:** Certified Copy of Page 27 of the City of Maysville Comprehensive Plan (Land Use Management Code & Growth Policies).
- **Exhibit I:** Official Meeting Minutes and Roll Call Vote from the July 16, 2026 Maysville City Council Meeting documenting Councilmember Boswell's "NO" vote on the Data Center Moratorium.

VI. VERIFICATION & NOTARIZATION

I declare under penalty of perjury under the laws of the State of Georgia that the facts set forth in this consolidated complaint are true and correct to the best of my knowledge, information, and belief.

_____, *Complainant* Maysville, GA

_____, Signature

Date: _____

STATE OF GEORGIA

COUNTY OF _____

Signed or attested before me on _____, 20

by _____, who proved to me on the basis of satisfactory evidence to be the person who appeared before me.

☐ Personally Known

☐ Produced Identification

Type of ID Produced: _____

Signature of Notary Public (Name of Notary, typed, stamped, or printed)

Notary Public, State of Georgia

My Commission Expires: _____

Key Statutory & Charter Findings

1. City Charter (Act No. 190 / H.B. 588):

Section 2.14(a) – Fiduciary Capacity: Explicitly states that elected officers *"are trustees and servants of the residents of the city and shall act in a fiduciary capacity for the benefit of such residents."* Telling constituents seeking clean water to *"act better"* and boasting about a 3-2 faction violates this statutory fiduciary standard.

Section 2.14(h) – Malfeasance & Forfeiture: Provides that any officer who knowingly violates duties or conceals conflicts *"shall be guilty of malfeasance in office or position and shall be deemed to have forfeited that person's office or position."*

Section 2.12(a) – Vacancies and Forfeiture: Mandates forfeiture upon events specified under Title 45 of O.C.G.A.

Section 2.15 – Inquiries & Investigations: Expressly authorizes the City Council to investigate conduct, subpoena witnesses, and take testimony under oath.

2. O.C.G.A. § 21-5-1 et seq. (Ethics in Government Act / Georgia Campaign Finance):

3.

- **Applicability Note:** O.C.G.A. § 21-5-1 et seq. gives jurisdiction to the **Georgia Government Transparency and Campaign Finance Commission** over campaign contribution disclosures (CCDRs), personal financial disclosure statements (FDS under O.C.G.A. § 21-5-50), and campaign expenditure violations.
- *Recommendation:* To ensure this ground is 100% applicable before the State Commission, Count 1 specifically highlights potential unreported campaign assistance or undisclosed campaign coordination under O.C.G.A. § 21-5-30 / § 21-5-50.

4. City Code of Ethics (Ordinance No. 2006-001):

Mandates that city officials maintain public confidence, treat citizens with courtesy and respect, and adhere strictly to legal limits of authority.

5. Georgia Public Officer & Open Governance Statutes:

- **O.C.G.A. § 16-10-1:** Violation of Oath by Public Officer (Felony offense under state law).
- **O.C.G.A. § 45-3-1:** Requirement of Oath of Office for public officials.

- **O.C.G.A. § 45-11-4:** Penalty for malpractice, misfeasance, or malfeasance in office.
- **O.C.G.A. § 50-14-1:** Georgia Open Meetings Act (governing public meetings and meeting decorum).
- **O.C.G.A. § 50-18-70:** Georgia Open Records Act.