## Mr. William A. Lehmann

## 3137 W. Main Street - Elizabeth City, NC 27909 252-267-5042

4 May 2018

Mr. Paul Coble
North Carolina General Services Office
Legislative Services Office
16 W. Jones St, Room 2129
Raleigh, NC 27601-1030

Ms. Kim Strach, Director
North Carolina State Board of Elections & Ethics Enforcement
P. O. Box 27255
Via Certified Mail #7005 0390 0005 5033 2228
Raleigh, NC 27611-7255

Dear Mr. Coble & Ms. Strach:

This is a request for an investigation of the actions of a legislative assistant, Diana London, who works with Representative Bob Steinburg, and if the allegations prove valid, a request that an ethics complaint against Rep. Bob Steinburg be entered based on your verified information to the NC State Board of Elections & Ethics Enforcement.

On Friday, April 27, 2018, I was campaigning for candidates in the Republican Primary at the Pasquotank County One Stop Site in Elizabeth City, NC. After I had finished speaking with a voter, another campaign worker asked me if I knew that a woman had been videotaping my conversation with the voter from behind my back. I did not know that. I approached the woman, Diana London, Legislative Assistant to Bob Steinburg. As I approached she immediately got on her phone. I questioned her actions and told her that she could tape and video me, but only after asking me first and not sneaking up behind me. (see exhibit 1: Complaint by Diana London to Pasquotank County Board of Elections.) It wasn't until three days later, on Monday, April 30, 2018, Ms. London returned to Pasquotank County to file a complaint against me. Please note at the Pasquotank County Board of Election's meeting on Tuesday, May 1, no action was taken because her actions and my response was on public property and not under the umbrella of responsibility of the Pasquotank County Board of Elections.

While I in no way thought her actions were appropriate, after further investigation into her activities since her February 1, 2018 employment as a legislative assistant at 40 hours per week, I have come to realize that Ms. London may be in violation of NCGS 126-13.

## § 126-13. Appropriate political activity of State employees defined.

- (a) As an individual, each State employee retains all the rights and obligations of citizenship provided in the Constitution and laws of the State of North Carolina and the Constitution and laws of the United States of America; however, no State employee subject to the North Carolina Human Resources Act or temporary State employee shall:
- (1) Take any active part in managing a campaign, or campaign for political office or otherwise engage in political activity while on duty or within any period of time during which he is expected to perform services for which he receives compensation from the State;
- (2) Otherwise use the authority of his position, or utilize State funds, supplies or vehicles to secure support for or oppose any candidate, party, or issue in an election involving candidates for office or party nominations, or affect the results thereof.

I am making the allegations of violation of this statute based on these facts that we have been able to determine:

Exhibit 2 - Copy of Diana London's Facebook Page indicating that she is Rep. Bob Steinburg's Manager.

Exhibit 3 - Copy of Rep. Bob Steinburg's 1st Qtr Campaign Finance Report that shows four payments to Ms. London totaling \$5500 for digital media and consulting. The first payments made on Jan 6, 2018 and Jan. 29, 2018 prior to her employment as a legislative assistant, and the remaining two on Feb. 28, 2018 and April 3, 2018.

Ms. London's dates campaigning in the district during normal business hous:

Monday, March 19, 2018: "BOB SQUAD" photo delivering signs in the district and attending Dare County Commissioner's meeting that night with Steinburg.

<u>Friday, April 6, 2018</u> - Videoing Signs in Dare #BobSquad - Kill Devil Hills helping people to register.

Tuesday, April 10,2018 in Camden County with Steinburg

Thursday, April 1, 2018 at the Dare County Republican Reagan Trump Dinner

Wednesday April 18, 2018 Chowan County

Thursday, April 19, 2018, Chauffering Rep. Bob Steinburg in Dare eating at local restaurant.

Friday, April 20, 2018 - In Dare County, prior to Candidate's Form that night

Friday, April 27, 2018 - Pasquotank County One Stop Site videotaped me.

Monday, April 30, 2018 - Personally visiting Pasquotank County Board of Elections to file a complaint against me.

Friday, May 4, 2018 - Rumored to be in Dare County.

Since Ms. London's mother is a resident of Dare County, Diana London has an opportunity to remain in Dare County without commuting back to Raleigh.

At this point I would like to point out that as a new hire, and with only 51.99 hours of cumulative sick and annual leave thru May 14, 2018, it would seem she has been away from her duties as legislative assistant for at least 80 hours, and devoting her time to her duties as "campaign" manager to Rep. Steinburg. Ms. London's position as a paid worker to Rep. Steinburg, the candidate, and as a NC state employee working for Rep. Bob Steinburg, the legislator makes it difficult to determine where one job ends and one job begins and is fraught with potential problems.

Given these facts, I am asking for either Legislative Services or Human Resources to verify that Ms. London has been fulfilling her duties to the taxpayers of North Carolina, who pay her salary; and not as a tax paid campaign worker for Representative Bob Steinburg. I expect verification through her use of paid leave applications, any employee badge entry recordings to legislative building and/ or garages, or video of the legislative area of Rep. Steinburg's office that would show a regular appearance by an employee reporting to work as a state employee. I would like to point out that if she had filled out leave for the dates given prior to April 27, 2018 – she should not have any more leave available on Friday, April 27 and Monday, April 30, 2018 when she was harassing me. In that regard, I am requesting all annual and sick leave that Ms. London has requested thru May 8, 2018 as per NCGS 132. Information may be mailed to me at the address on this letter.

Again, if you find my concerns have merit based on your records, I am requesting a full ethics investigation into Rep. Bob Steinburg and his use of a tax funded position to work on his campaign.

Sincerely,

William A. Lehmann

Enclosures: Exhibits 1,2,& 3

Emailed on Friday, May 4, 2018 to Paul Coble and Kim Strach

Signature Redacted by Board of Elections Complaint filed by Diana London on Monday, April 30th

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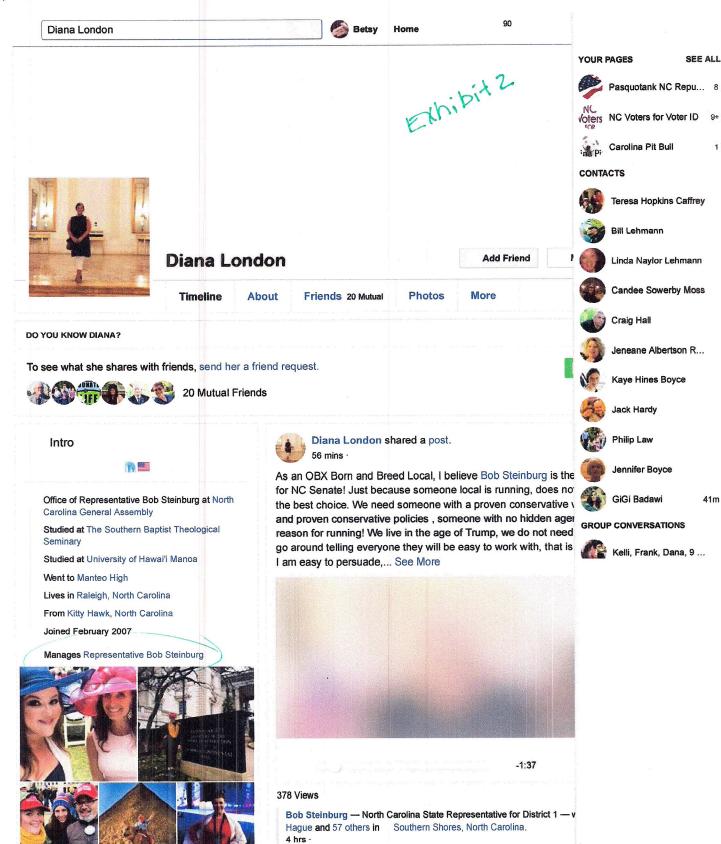
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See More

Sitting Dare County Commissioner Jack Shea, Endorses Bob Steinburg 1

Thank you Commissioner Shea for you endorsement and su...

4/12/2018 DARE COUNTY REPUBLICAN	PARTY	NC	G		Operating (	1 Check	-240	-240
	VARTHMOR RALEIGH	NC	0	DIGITAL MARKETIN	Operating I	1 Check	1000	5500
1/29/2018 DIANA LONDON 8645 SW	VARTHMOR RALEIGH	NC	0	CONSULTING	Operating I	1 Check	1500	5500
2/28/2018 DIANA LONDON 8645 SW	VARTHMORRALEIGH	NC	Α	CONSULTING	Operating I	1 Check	1500	5500
	VARTHMOR RALEIGH	NC	Α	CONSULTING	Operating I	1 Check	1500	5500
1/23/2018 OAK GROVE CAMP/ 2474 W/	ALNUT STRICARY	NC	0	CONSULTING	Operating I	1 Check	2000	11750
2/20/2018 OAK GROVE CAMP/ 2474 W/	ALNUT STRICARY	NC	0	CONSULTING	Operating (	1 Check	2000	11750
4/4/2018 OAK GROVE CAMP/ 2474 W	ALNUT STRECARY	NC	O	CONSULTING FEE	Operating i	1 Check	2000	11750
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4/10/2018 PCS MARKETING GF2534 CC	OMMERCE E CINCINNAT	ГОН	В	SIGNS	Operating (	1 Check	174.4	174.4
2/22/2018 PCS MARKETING GF2534 CC	DMMERCE E CINCINNAT	ГОН	В	LAWN SIGNS, BUM	Operating I	1 Check	2594.19	3738.86
3/8/2018 PCS MARKETING GF2534 CC	DMMERCE E CINCINNAT	ГОН	В	SIGNS	Operating I	1 Check	1067.74	3738.86
4/10/2018 PCS MARKETING GF 2534 CC	MMERCE ECINCINNAT	ГОН	В	WIRE SIGNS	Operating (	1 Check	76.93	3738,86
3/8/2018 POLITICAL INK, INC 1200 18	TH STREET WASHINGT	T DC	В	PALM CARDS	Operating I	1 Check	925.37	27105.33
3/21/2018 POLITICAL INK, INC 1200 18	TH STREET WASHINGT	T DC	В	PRINTING POSTAGE	Operating (	1 Check	4558.91	27105.33
4/2/2018 POLITICAL INK, INC 1200 18	TH STREET WASHINGT	T DC	В	PRINTING/POSTAG	Operating !	1 Check	4558.91	27105.33
4/7/2018 POLITICAL INK, INC 1200 18	TH STREET WASHINGT	TDC	Α	PRINTING, POSTAG	Operating I	1 Check	4558.91	27105.33
4/16/2018 POLITICAL INK, INC 1200 18	TH STREET WASHINGT	T DC	В	PRINTING/POSTAG	Operating I	1 Check	3972.16	27105.33
4/16/2018 POLITICAL INK, INC 1200 18	TH STREET WASHINGT	T DC	В	PRINTING/ POSTAG	Operating (	1 Check	3972.16	27105.33
4/20/2018 POLITICAL INK, INC 1200 18	TH STREET WASHINGT	T DC	В	MAILERS/POSTAGE	Operating I	1 Check	4558.91	27105.33
2/4/2018 KEN ROBOL 1161 C/	atalpa RD Greenvili	. NC	Α	WEBSITE	Operating (	1 Check	125	482
1/22/2018 SHOOK CONSULTIN 5530 W.	ADE PARK E RALEIGH	NC	0	CONSULTING	Operating I	1 Check	750	750
4/5/2018 SRH MEDIA PO BOX				TV ADS FOX NEWS	Operating I	1 Electronic i	9545	9545
1/21/2018 KEY H STAGE 105 W C	CHURCH ST EDENTON	NC	0	CONSULTING	Operating i	1 Check	200	2494.07
2/12/2018 KEY H STAGE 105 W C	CHURCH ST EDENTON	NC	0	CONSULTING	Operating I	1 Check	300	2494.07
3/1/2018 KEY H STAGE 105 W C	CHURCH ST EDENTON	NC	0	CONSULTING	Operating (	1 Check	250	2494.07
4/2/2018 KEY H STAGE 105 W C	CHURCH ST EDENTON	NC	0	CONSULTING	Operating I	1 Check	250	2494.07
2/4/2018 BOB STEINBURG 103 S G	RANVILLE S' EDENTON	NC	1		Operating I	1 Check	100	9446.39
2/10/2018 BOB STEINBURG 103 S G	RANVILLE S' EDENTON	NC	Α	REIMBURSE SHUTT	Operating (	1 Check	98	9446.39
2/22/2018 MARIE STEINBURG 103 S G	RANVILLE S' EDENTON	NC	0	REIMBURSE MEET	Operating f	1 Check	229.11	229.11
3/13/2018 THE CULPEPPER IN 609 W	MAIN ST ELIZABETH	NC	C	RECEPTION EVVEN	Operating I	1 Check	1297.01	1297.01
1/9/2018 US POSTAL SERVICE 100 N B	ROAD ST. EDENTON	NC	1		Operating (	1 Check	129.59	223.73
1/23/2018 US POSTAL SERVICE 100 N B	ROAD ST. EDENTON		1		Operating I	1 Check	6.7	223.73
3/18/2018 TYLER VICK		NC	0	PAID LABOR PUTTII	Operating I	1 Check	160	160