



Official Use Only:
Date Received:

STATE ETHICS COMMISSION

COMPLAINT FORM

The State Ethics Commission has the authority to investigate complaints against those persons covered by Chapter 138A, North Carolina General Statutes, "The State Government Ethics Act," for alleged violations of the Act. Please see section 138A-12 of the Act. This complaint must be filed within two years of the date you, the Complainant, knew or should have known of the conduct upon which this complaint is based. Please note that the Ethics Commission does **NOT** have jurisdiction over all public officials or state employees.

CONTACT INFORMATION

(Please Type or Print clearly)

The Ethics Act requires that a complaint contain the name, address, and telephone number of the person filing the complaint. The Commission cannot accept anonymous complaints.

Printed Name: **Tina Lunt**

Address: **1102 Cedar Street** _____ **Elizabeth City** _____
(City)

Telephone No: (**252**) **339-7279** _____ **NC** **27909** _____
(State) (Zip)

NATURE OF THE COMPLAINT

The Ethics Commission does **NOT** have jurisdiction over all public officials or state employees. G.S. 138A applies to legislators, legislative employees, public servants, and judicial officers. Please refer to G.S. 138A-3(30) for a list of those State employees included in the category of "public servants." Also, a list of covered persons is posted on the State Ethics Commission's website: www.ethicscommission.nc.gov.

1. Identify the person that you believe may have violated specific provisions of the Ethics Act:

Name: **Representative Bob Steinburg** _____

Job Title or Appointive Position of the person against whom this complaint is filed:

Representative to the House in the NC Legislature

2. Provide the date(s) the alleged violation occurred: **March 11, 2018**

3. Please provide a concise statement of the nature of your complaint **and** specific facts indicating that a violation of Chapter 138A (the Ethics Act) *or* Chapter 120 (the Legislative Ethics Act) of the North Carolina General Statutes has occurred. Please provide as much detail as possible and attach any documentation you have that supports your claim. *Attach additional pages if needed.*

On March 11, 2018 Representative Steinburg signed his Statement of Economic Interest for the purpose of fulfilling his election filing obligation to run for Senate in District 1 in the November 2018 election. There are, seemingly, several irregularities with the form's completion. First, Representative Steinburg lists himself as the sole MBR of the Wolfstein Group, which is his sports planning and consulting group, but does not list it as a source of income in number 6 on page 5. The contract between Currituck and Wolfstein Group states \$16,000.00 will be paid to Wolfstein Group when the contract was approved which occurred on December 7, 2017. Wolfstein Group received the remaining \$34,000 on January 3, 2018. The contract shows a W-9 was reported for Robert C. Steinburg, Sr. DBA Wolfstein Group, LLC. The W-9 was dated 11/17/2017.

Additionally, number 11 on Page 7 is of interest. Representative Steinburg checked "no" when asked if he had provided consulting services individually or as part of a professional association for which he charged over \$10,000 during the year 2017. Indeed Representative Steinburg, as sole MBR of Wolfstein Group, entered into a contract on December 7, 2017 with the County of Currituck to consult and plan a sporting event in Ashville. The charge for Wolfstein Group services was \$50,000. Representative Steinburg failed to disclose that information in number 11 on the Statement of Economic Interest.

I believe Representative Steinburg may have concealed or failed to disclose required information on the Statement of Economic Interest.

Attach additional pages if needed.

4. Provide the names of other persons who may have information that would support your allegations.

Dan Scanlon, Currituck County Manager, Leeann Walton, Clerk to the Currituck Board of Commissioners, Bobby Hanig, Chairman of the Currituck County Commissioner and Candidate for House of Representatives District 6.

5. State whether the individuals and conduct complained of have been the subject of a prior complaint or proceeding of any kind. If so, state the place where the prior complaint was filed and its current status.

I personally filed a complaint with the Ethics Commission August 1, 2018 concerning the contract signed between Representative Steinburg's Wolfstein Group and Currituck County. I am not certain of the status of that complaint and I am sending this complaint as additional information for consideration.

SWORN COMPLAINT

I hereby swear or affirm, under penalty of perjury and other penalties established by North Carolina law, that the information provided in this complaint is true, correct, complete, and of my own personal knowledge, or if not, I believe the information to be true based upon: **Representative Steiburg's Statement of Economic Interest, Independent Contractor Agreement between Wolfstein Group and Currituck County.**

(Signature) Date: _____

STATE OF NORTH CAROLINA
COUNTY OF _____

SWORN TO (or affirmed) and subscribed before me this day by: _____

Date: _____

Official Signature of Notary Public

Notary's printed or typed name: _____

My Commission Expires: _____

(Official Seal)

**Submit the completed sworn complaint to:
State Ethics Commission
1324 Mail Service Center
Raleigh, NC 27699-1324**