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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: **Ms. Tina Lunt** \_\_\_\_\_

Address: **1102 Cedar Street** \_\_\_\_\_ **Elizabeth City** \_\_\_\_\_

(City)

Telephone No: ( **252** ) **339-7279** \_\_\_\_\_ **North Carolina** \_\_\_\_\_ **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](http://www.ethicscommission.nc.gov).

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

Name: **Bob Steinburg**

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

**Member of the House of Representatives** \_\_\_\_\_

2. Provide the date(s) the alleged violation occurred: **December 2017** \_\_\_\_\_

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.*

**Representative Bob Steinburg is a member of the Transportation Committee and also the Commerce and Job Development Committee. As such, he is aware of the detailed workings of both committees as they relate to the upcoming development of Interstate 87 in Northeast North Carolina. This through fare will enhance the flow of commerce traffic from Raleigh to the Tidewater area and all stops in between including Perquimans, Pasquotank and Camden counties. As the attached articles will show, Currituck County would like to see I-87 built through their county. In October 2017 Representative Steinburg agreed with Pasquotank and Camden officials and said he'd support prioritizing interstate development from Elizabeth City (Pasquotank County) to Virginia and said that would make Pasquotank and Camden's industrial parks more attractive (article October 3, 2017). But note in the 2015 article Currituck was laying the groundwork for a potential connection with the new I-87 by having the northern**

**back roads connecting with Camden being made into a larger road to accommodate large truck traffic. To quote Currituck County Manager Dan Scanlon, "Having a limited-access connection between the two major accesses into Virginia is simply logical and helps with economic development of northeastern North Carolina."**

**Much to everyone's surprise it was said by Shane York, a feasibility studies engineer with NCDOT in October 2017, "Currituck County officials contacted NCDOT about the prospect of routing I-87 through northern Currituck into Virginia instead along the current path of U.S. 17 into Virginia." (article dated Oct. 8, 2017) On October 28, 2017 it was reported that Currituck County Manager Dan Scanlon acknowledged that the county asked NCDOT to study the feasibility of aligning I-87 with the proposed U.S. 17-Currituck connector. By late October 2017 NCDOT documents show a proposed alternate route for I-87 into northern Currituck, which is the location of the county's proposed Moyock Mega-Site commercial and residential project. All of this brings me to my complaint. It was revealed July 18, 2018 Currituck County paid a private company owned by Representative Steinburg \$50,000 to promote and market an NCAA basketball tournament the county is sponsoring in Asheville this fall called the "Battle in the Blue Ridge."**

**Currituck County Manager Dan Scanlon and Representative Steinburg signed the sponsorship deal in December 2017. "Asked why Currituck didn't seek bids for the promotion, Scanlon explained Currituck was responding to an offer Steinburg made." Yes this is the same Currituck County Manager Dan Scanlon who has been attempting to persuade the NCDOT to reroute I-87 through his county. Additionally, the article dated July 18, 2018 says Currituck Board of Commissioners Chairman Bobby Hanig asked Steinburg to propose it directly to tourism officials. Instead Representative Steinburg went to Currituck County Manager Dan Scanlon and made the agreement. "The agreement between WolfeStein and Currituck which provides that, in exchange for \$50,000, WolfeStein will provide various promotional services. It will secure naming rights to the event." Additionally, "The tournament will also advertise Currituck before and during the tournament, and WolfeStein will, in the months before the tournament, promote it on social media, promote it to local networks and national networks including ESPN, and, according to the contract, will pursue "aggressive ticket sales and marketing campaign to help ensure large crowds." (article July 18, 2018) However, Representative Steinburg later said, "All coverage of the event is supposed to use its full name, including "visitcurrituckobx.com," he said, which should help generate widespread radio, TV and online exposure for Currituck. To buy advertisements with**

that broad a reach would be far more expensive.” (article July 22, 2018) This directly refutes what he earlier said his company would do, “promote it to local networks and national networks including ESPN.” (article July 18, 2018)

Representative Steinburg rejected any quid pro quo with the deal. “Steinburg said he cleared the potential arrangement with state ethics officials before approaching Currituck last year.” (article July 18, 2018) “He said he spoke with Erika Churchill, a staffer to the Legislative Ethics Committee, and she cleared the arrangement.” (article July 22, 2018) However, it does appear like quid pro quo and did he really clear this deal with the ethics committee? According to the article Erika Churchill refused to answer questions even though Representative Steinburg says he sent her an email giving consent to speak about this issue. (article July 22, 2018) Representative Steinburg did not go through the tourism officials as directed by the chairman of the Commissioners he went directly to the County Manager and that appears inappropriate. He is a state official and should have followed the directions he was given by the Chairman of the Currituck County Commissioners. Representative Steinburg has an obligation to the citizens of North Carolina to keep his personal financial affairs and professional affairs absent of conflicts of interest. In making this deal in Currituck he has left a wake of unanswered questions with top officials in Currituck and many citizens of Currituck and the region. In addition the County Manager of Currituck wants an interstate in his county and he knows Representative Steinburg is on the Transportation Committee. Both officials should have avoided closed door deals that benefit a private company owned by Representative Steinburg. All measures should have been taken to keep this deal in the light of day. I believe this is in violation of G. S. 138A recodified effective May 1, 2017 in Article 7 of the Elections and Ethics Enforcement Act:

**§ 163A-211. Use of public position for private gain.**

(a) Except as permitted under G.S. 163A-218, a covered person or legislative employee shall not knowingly use the covered person's or legislative employee's public position in an official action or legislative action that will result in financial benefit to the covered person or legislative employee, a member of the covered person's or legislative employee's extended family, or business with which the covered person or legislative employee is associated. This subsection shall not apply to financial or other benefits derived by a covered person or legislative employee that the covered person or legislative employee would enjoy to an extent no greater than that which other citizens of the State would or could enjoy, or that are so remote, tenuous, insignificant, or speculative that a reasonable person would conclude under the circumstances that the covered person's or legislative employee's ability to protect the public interest and perform the covered person's or legislative employee's official duties would not be compromised.

§ 163A-215. Other rules of conduct. (b) A public servant shall continually monitor, evaluate, and manage the public servant's personal, financial, and professional affairs to ensure the absence of conflicts of interest.

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**ALL CITED ARTICLES ARE ATTACHED**

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*Attach additional pages if needed.*

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

**Currituck County Manager Dan Scanlon,  
Currituck County Commissioner Chairman Bobby Hanig,  
Shane York, a feasibility studies engineer with NCDOT,  
Erika Churchill, a staffer to the Legislative Ethics Committee,  
John Hawley (Reporter The Daily Advance and The Reflector),  
William F. West (Reporter The Daily Advance),  
Cindy Beamon (Reporter Daily Advance).**

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 have no knowledge of prior or pending complaints.**

### **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: **information shared in The Daily Advance and The Daily Reflector and finally the The HayMaker listing the Codes violated in Currituck Policy which includes direct quotes. I included the articles as supporting evidence to show where I gathered my information to reach the assertions I am claiming. As a citizen of North Carolina I feel the evidence warrants an investigation to determine if the Code of Ethics cited have been violated.**

\_\_\_\_\_  
(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)

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

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