



Registry of Election Finance Sworn Complaint

A registered voter of Tennessee may file a sworn complaint alleging that a statement filed regarding an election for which that voter was qualified to vote does not conform to law or to the truth or that a person has failed to file a statement required by law (T.C.A. §2-10-108 (a)).

This form should be completed in its entirety, signed and notarized and then mailed to: Registry of Election Finance, 404 James Robertson Parkway, Suite 104, Nashville, TN 37243.

Please note: any person who knowingly files a sworn complaint which is false or for the purpose of harassment is subject to civil penalties and is liable for reasonable attorney's fees incurred by a candidate who was the subject of such complaint (T.C.A. § 2-10-108 (d)).

Complainant

Name SHARON FORD
Address 3401 GRANNY WHITE PIC
City NASHVILLE State TN Zip 37204
Phone 615-587-0127 E-Mail Sford@Live.com

Complaint

Please provide as much detail as possible in the description of your complaint. Please attach additional pages and any documentation as necessary.

See attached document.

2018 FEB 20 PM 3:20

Signature Sharon L Ford Date 02-16-18

Sworn to and Subscribed before me in the State of Tennessee

This 16 Day of Feb, 2018

Douglas R Sipes
Notary Public

3-8-2021
Date Commission expires



BETH HARWELL/HARWELL PAC CAMPAIGN FINANCE COMPLAINT

BETH HARWELL has used her PAC, HARWELL PAC and recently renamed as TENNESSEANS FOR GOOD STATE GOVERNMENT, in an illegal manner for coordinated expenditures to benefit her campaign in excess of contribution limits.

In late December, a direct mail piece stating "PAID FOR BY HARWELL PAC" was sent to residents throughout Middle Tennessee. The mailer highlighted the record of Beth Harwell and Beth Harwell's service as speaker, including a letter signed by Beth Harwell inviting recipients to provide feedback and complete "Speaker Beth Harwell's Tennessee Survey". The survey was listed on the back side of the mail piece and allows recipients to tell Beth Harwell their feelings on issues such as education reform, medical marijuana, and welfare recipient work requirements – all issues Harwell herself is championing in the legislature this year according to various media reports. Recipients could also provide their survey responses by visiting www.speakerbethharwell.com.

The mailer also included a picture of Beth Harwell identical to her government paid, taxpayer funded portrait as featured on the Tennessee General Assembly's website, despite saying "NOT PRINTED AT GOVERNMENT EXPENSE".

The mail piece's "paid for by" disclaimer also does not include language either signifying it as an authorized expenditure by a clearly identified candidate OR as an independent expenditure not authorized by any candidate as required by law. The recipient is led to believe Harwell PAC's expenditure is authorized by the candidate since it includes a personal letter from Beth Harwell and her signature, making it an in-kind contribution to her campaign. It is clear that the content was provided in coordination with and authorized by a clearly identified candidate, Beth Harwell.

The mail has postage stamp "MarginOV.com", which is the website for Harwell and Harwell PAC vendor Margin of Victory Partners. HARWELL PAC paid Margin of Victory \$24,845 on December 10, 2017 for "Direct Mail" and did not disclose the expense as either an in-kind contribution or an independent expenditure. Due to the timing and singular nature of the expense, the mail piece in question had a cost of \$24,845.

The mail piece was also sent well outside of her district, evidenced by the included piece that was mailed to an address in Murfreesboro, TN (redacted to protect privacy).

The website listed on the mail piece, www.speakerbethharwell.com, is titled "Beth Harwell – Tennessee's Speaker of the House" and includes links to "Tell Me What You Think", and language on the front page that says "Under my leadership as Speaker of the House", and states that "I am a strong advocate for....", implying that the content was written by Beth Harwell and is not an independent expenditure. The website's paid for by disclaimer is listed as Paid for by Tennesseans for Good State Government, the new name for Harwell PAC, and also does not include the required language to say whether it is an in-kind contribution or an

independent expenditure. Content on the website leads the reader to believe it has been provided in coordination with and approved by the clearly identified candidate, Beth Harwell.

According to WHOIS registration records for SPEAKERBETHHARWELL.COM, the website was registered on October 19, 2017 at 3:20PM CDT. The Registrant's name is Beth Harwell, and the registrant phone number is 615-812-5272 – the phone number of Kara Owen, who is listed on Beth Harwell's government website as "Deputy Chief of Staff of Policy & Communication", and registrant email as beth@bethharwell.com, which is the official email address for Beth Harwell on the Beth Harwell for Governor Campaign. This proves the PAC paid for website, and the mail piece that points to the website, were all authorized by and done in coordination with agents of Beth Harwell.

Further, Kara Owen's October government time sheet is attached, and shows the political website was registered while she was working on government time, which is a Class C misdemeanor.

Harwell PAC paid a total of \$23,513.45 to Stoneridge Group for "Marketing/Internet" in 2017. Harwell PAC also paid GODADDY.COM \$446.81 in 2017 for "WEBSITE/DOMAIN", for a total internet expense apparently related to this website.

Therefore, a total of \$48,805.26 in obviously coordinated expenditures were made by Harwell PAC to support Beth Harwell through the mail piece and website that should have been counted as an in-kind subject to contribution limits of \$11,800 for the primary. This leaves an excess, illegal contribution of \$37,005.26 for these coordinated expenditures.

Harwell PAC also contributed \$23,600 to Beth Harwell's campaign on July 14, 2017, which the campaign allocated as \$11,800 for the primary and \$11,800 for the general. The vast majority of the coordinated expenditures by Harwell PAC occurred after this date, so the campaign knowingly violated coordination rules and contribution limits. This makes the entire in-kind contribution of the mail piece and website a violation of the contribution limits and campaign finance law.

Harwell PAC also lists Beth Harwell's home address, 413 West Tyne Dr, Nashville, TN 37205, as its address on its registration with the Tennessee Registry of Election Finance and its contact email address as beth@bethharwell.com, which is the email address listed for Beth Harwell on her official Beth Harwell for Governor website. This proves Beth Harwell has direct control of her PAC. Harwell PAC also shares a treasurer with Harwell's 2016 and 2018 State House campaign accounts, further showing coordination between Harwell and her PAC.

Beth Harwell for Governor and Harwell PAC also share numerous vendors, including Stoneridge Group, Margin of Victory Partners, and Rachel Barrett and Company. This, along with them sharing contact information as Harwell's home address, proves Harwell PAC and Beth Harwell for Governor are operated in a coordinated manner.

TOTAL VENDOR PAYMENTS IN 2017 BY BETH HARWELL FOR GOVERNOR:

Stoneridge Group: \$37,125

Rachel Barrett and Company: \$50,000

Margin of Victory Partners: \$4,200

TOTAL VENDOR PAYMENTS IN 2017 BY HARWELL PAC:

Stoneridge Group: \$23,513.45

Rachel Barrett and Company: \$51,685

Margin of Victory Partners: \$27,118

These significant payments to shared vendors prove that the Harwell for Governor campaign and Harwell PAC are operating in a coordinated, illegal manner.

As someone who has advocated strongly for tight controls on campaign finance laws and limits, I am disturbed that Beth Harwell would flagrantly violate the law and use her Political Action Committee to illegally support her campaign for governor.

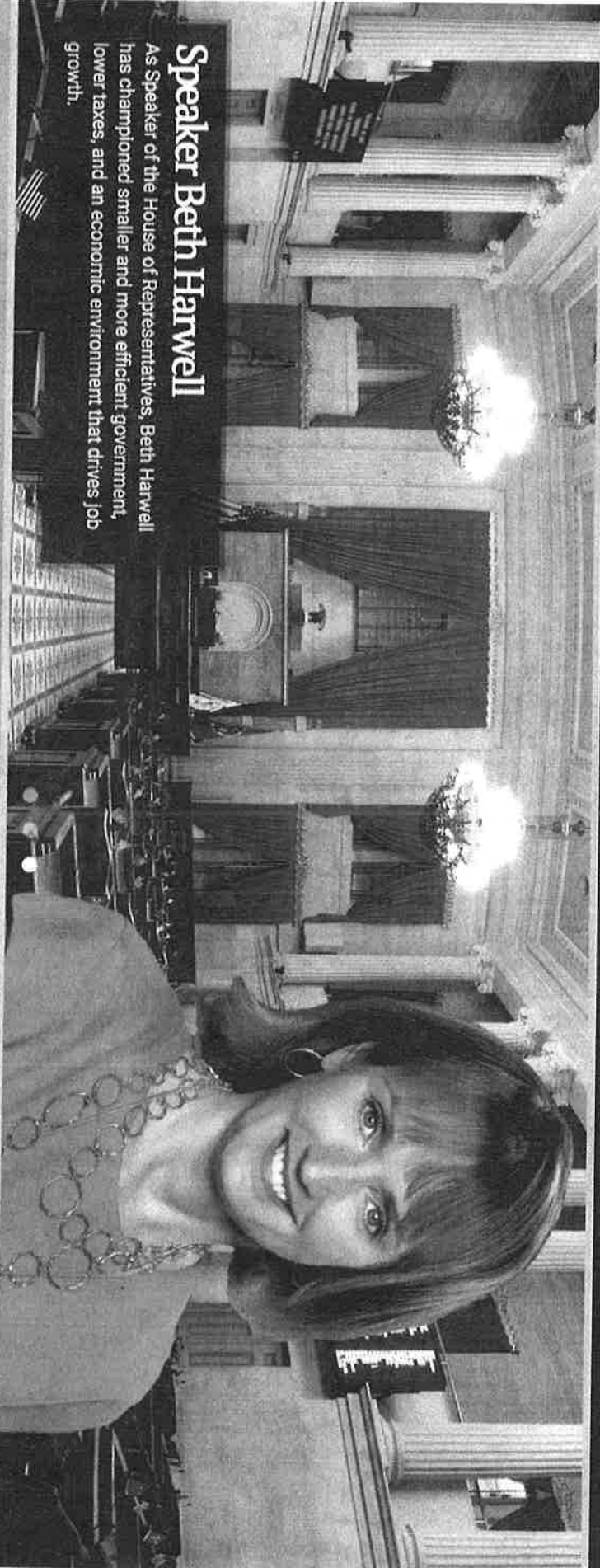
TENNESSEE GENERAL ASSEMBLY

- LEGISLATORS
- LEGISLATION
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- SCHEDULES & CALENDARS
- COMMITTEES
- DIRECTORY

Search for Bills, Legislators and more

FIND MY LEGISLATOR

MY BILLS



Speaker Beth Harwell

As Speaker of the House of Representatives, Beth Harwell has championed smaller and more efficient government, lower taxes, and an economic environment that drives job growth.

Senate

FEB 15 08:30 AM

Senate Floor Session

10:00 AM

Senate Energy, Ag, and Nat Resources Committee

House of Representatives

FEB 15 08:30 AM

Calendar & Rules Committee

09:00 AM

House Floor Session

Joint

No events currently scheduled.

Joint Schedules & Calendars

What's Streaming Now



Beth Harwell

TENNESSEE'S SPEAKER OF THE HOUSE

Dear fellow Tennessean,

In January, the Tennessee General Assembly will reconvene for its annual session. Before I gavel the House of Representatives into session, it is important for legislators to hear from you. Please take a few minutes to complete this Tennessee Survey online at www.SpeakerBethHarwell.com or by returning this form by mail.

My colleagues and I look forward to hearing from you. You can contact your state representative directly at www.capitol.tn.gov or by calling 615-741-1100.

Sincerely,

Beth Harwell
Speaker of the House

2017 Legislative accomplishments

- ◆ **Balanced the budget while cutting taxes**
- ◆ **No new debt for the second year in a row**
- ◆ **Enhanced public safety** by better protecting senior citizens and other vulnerable adults from criminals
- ◆ **Reduced business taxes** to attract manufacturers to the state
- ◆ **Supported our veterans** by restoring property tax relief and providing new educational opportunities

Paid for by Harwell PAC, A.R. Caldwell, Treasurer
NOT PRINTED AT GOVERNMENT EXPENSE

*****AUTO***5-DIGIT 37130

Murfreesboro, TN 37130



Postnet Std.
US Postage
PAID
MarginOV.com

Speaker Beth Harwell's Tennessee Survey 2017

Please visit www.SpeakerBethHarwell.com to complete this survey.

1. Tennessee is heading in the right direction.
- Strongly agree Agree Disagree Strongly disagree Undecided
2. What is the most important issue facing Tennessee?
- | | | | |
|---|--------------------------------------|--|------------------------------------|
| <input type="checkbox"/> Broadband access | <input type="checkbox"/> Crime | <input type="checkbox"/> Drug abuse | <input type="checkbox"/> Education |
| <input type="checkbox"/> Healthcare | <input type="checkbox"/> Immigration | <input type="checkbox"/> Jobs/economic development | |
| <input type="checkbox"/> Roads/infrastructure | <input type="checkbox"/> Taxes | <input type="checkbox"/> Second Amendment Rights | |
3. Tennessee's education reform efforts are headed in the right direction.
- Strongly agree Agree Disagree Strongly disagree Undecided
4. Please rank the following public safety issues below in order of importance to our state.
- | | | |
|-------------------------|------------------|---------------------|
| _____ Domestic violence | _____ Drug abuse | _____ Elder abuse |
| _____ Sex trafficking | _____ Terrorism | _____ Violent crime |
5. Do you support legalizing medical marijuana, provided it is regulated properly by the state?
- Support Oppose Undecided
6. The General Assembly has placed restrictions on abortion to the extent courts will allow. There are exceptions for rape, incest, and protecting the life of the mother. What do you think of Tennessee's laws on abortion?
- About right Too strict More laws needed No opinion

7. Currently, Tennessee law requires a background check to receive a permit to carry a gun. Do you favor or oppose this permit system?
- Favor Oppose Undecided
8. Do you believe able bodied Tennesseans without small children should work a minimum number of hours to receive TennCare benefits?
- Strongly agree Agree Disagree Strongly disagree Undecided
9. Which would you prefer?
- Lower business taxes on small businesses
- Spend money to incentivize companies to move to Tennessee
10. What do you think are the most important issues facing Tennessee?
- _____
- _____
- _____
-
- Name _____
- Address _____
- City, Zip _____
- Phone _____
- Email _____

If you prefer to reply by postal mail, please include your name, address, and phone and return the survey to :

Speaker of the House Beth Harwell • PO Box 198433 • Nashville, TN 37219

Employee Name: Kara Owen Month/Year October 2017

Date	Time In	Time Out	Type of Leave Used	Amount of Leave Used	Comp Time Accrued	Comments
1	SUN					
2	8:00	4:30				
3	8:00	4:30				
4	8:00	4:30				
5	out	out	sick	7.5		
6	8:00	4:30				
7	SAT					
8	SUN					
9	8:00	4:30				
10	8:00	4:30				
11	8:00	4:30				
12	8:00	4:30				
13	8:00	4:30				
14	SAT					
15	SUN					
16	8:00	4:00	comp A	.5		
17	8:00	4:30				
18	8:00	4:30				
19	8:00	4:30				
20	1:00	3:00	comp A	5		
21	SAT					
22	SUN					
23	8:00	4:30				
24	8:00	4:30				
25	8:00	4:30				
26	8:00	1:30	comp A	3.0		RECEIVED
27	8:00	4:30				APR 14 2011
28	SAT					
29	SUN					
30	8:00	4:30				ADVISORY
31	8:00	4:30				REGISTRATION

Total Hours Without Pay	
Total Sick Leave Used	
Total Annual Leave Used	9.0
Total Comp Leave Used	
Total Other Leave Used	
Total Comp Time Accrued	



Employee Signature: Kara Owen
 Member/Supervisor Approval: [Signature]
 Speaker/Director Approval: [Signature]

Hour	Minutes
.1	= 1 - 6
.2	= 7 - 12
.3	= 13 - 18
.4	= 19 - 24
.5	= 25 - 30
.6	= 31 - 36
.7	= 37 - 42
.8	= 43 - 48
.9	= 49 - 54
1	= 55 - 60

L. ADM. USE ONLY	Sick	Annual	Comp	Other
Balance Forward	878.8	251.6		
Accumulated Leave	7.5	13.2		
Leave Used	7.5	9.0		
Ending Balance	878.8	255.8		

[Partners](#)

Search the WHOIS Database

[Private Registration](#) [Local listings](#)

WHOIS search results

Domain Name: SPEAKERBETHHARWELL.COM
Registry Domain ID: 2176623673_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: <http://www.godaddy.com>
Update Date: 2017-10-19T20:20:53Z
Creation Date: 2017-10-19T20:20:53Z
Registrar Registration Expiration Date: 2018-10-19T20:20:53Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientTransferProhibited <http://www.icann.org/epp#clientTransferProhibited>
Domain Status: clientUpdateProhibited <http://www.icann.org/epp#clientUpdateProhibited>
Domain Status: clientRenewProhibited <http://www.icann.org/epp#clientRenewProhibited>
Domain Status: clientDeleteProhibited <http://www.icann.org/epp#clientDeleteProhibited>
Registry Registrant ID:
Registrant Name: Beth Harwell
Registrant Organization: Political Action Committee
Registrant Street: 95 White Bridge Road
Registrant City: Nashville
Registrant State/Province: Tennessee
Registrant Postal Code: 37205
Registrant Country: US
Registrant Phone: +1.6158125272
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: beth@bethharwell.com
Registry Admin ID:
Admin Name: Beth Harwell
Admin Organization: Political Action Committee
Admin Street: 95 White Bridge Road
Admin City: Nashville
Admin State/Province: Tennessee

Admin Postal Code: 37205
Admin Country: US
Admin Phone: +1.6158125272
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: beth@bethharwell.com
Registry Tech ID:
Tech Name: Beth Harwell
Tech Organization: Political Action Committee
Tech Street: 95 White Bridge Road
Tech City: Nashville
Tech State/Province: Tennessee
Tech Postal Code: 37205
Tech Country: US
Tech Phone: +1.6158125272
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: beth@bethharwell.com
Name Server: NS1.WORDPRESS.COM
Name Server: NS2.WORDPRESS.COM
Name Server: NS3.WORDPRESS.COM
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>
>>> Last update of WHOIS database: 2017-12-12T3:00:00Z <<<

For more information on Whois status codes, please visit <https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

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Please note: the registrant of the domain name is specified in the "registrant" section. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

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