



Date Received:

Case Number:

LEGISLATIVE ETHICS COMMITTEE

COMPLAINT FORM

The Legislative Ethics Committee has the authority to investigate complaints against sitting legislators for alleged violations of matters covered by Chapter 138A of the North Carolina General Statutes (the State Government Ethics Act) or Article 14 of Chapter 120 of the North Carolina General Statutes (the Legislative Ethics Act). Examples of matters covered by the State Government Ethics Act include use of public position for private gain; conflict of interest while taking legislative action; or receipt of a prohibited gift. Examples of matters covered by the Legislative Ethics Act include bribery; unethical personnel-related action; disclosure of confidential information; a violation of the criminal law by a legislator while acting in the legislator's official capacity as a participant in the lawmaking process; violation of an Ethical Principle and Guideline adopted by the Legislative Ethics Committee; or violation of a formal written advisory opinion adopted by the Legislative Ethics Committee.

Submit the completed sworn complaint to:

Cochairs, Legislative Ethics Committee
c/o Legislative Analysis Division, North Carolina General Assembly
300 N. Salisbury Street
Room 545, Legislative Office Building
Raleigh, North Carolina 27603-5925

COMPLAINANT'S INFORMATION

(Please type or print clearly.)

The Legislative Ethics Committee cannot accept anonymous complaints. Please provide your name, address, county of voter registration, and telephone number.

Printed Name: Bob Hall aka Robert H. Hall

Address: 5706 Old Stony Way

City: Durham State: NC Zip: 27705

County: Orange Telephone Number: (919) 489-1931

NATURE OF THE COMPLAINT

1. The complaint must identify the individual legislator who you believe may have violated provisions of the State Government Ethics Act or the Legislative Ethics Act. If the complaint involves multiple legislators, a separate complaint form must be submitted for each legislator. *The Legislative Ethics Committee only has jurisdiction over current legislators, and does not have jurisdiction over legislative employees, public servants, judicial officers, or former legislators.*

Name of the current legislator against whom the complaint is filed: Rep. Joshua Robert Dobson

2. The complaint must identify the specific timeframe of the alleged violation(s) of the State Government Ethics Act or the Legislative Ethics Act.

Provide the date(s) the alleged violation(s) occurred: January 1, 2017 to June 30, 2020

3. The complaint must be within your own personal knowledge, or you must provide the basis upon which you believe the alleged violation(s) of the State Government Ethics Act or the Legislative Ethics Act has occurred. Please provide a concise statement of the nature of your complaint including any relevant supporting facts with as much detail as possible. Attach any documentation you have that supports your claim, and *use additional pages if needed.*

Upon information and belief: Rep. Dobson has violated the State Government Ethics Act and/or Legislative Ethics Act by using his public position as a member of the General Assembly to solicit substantial compensation from the state government for lodging, meals and travel expenses which he claimed to have incurred in the performance of his duties as a legislator, but which were in fact paid by his campaign committee and not by himself. By taking official action to cause the government to make payments for a supposedly public purpose, he enriched his private fortunes with tax-exempt income.

Based on my examination of expense records of current legislators, no House members have taken action to receive more government payments for expenses paid by another source than Rep. Dobson and Rep. John Torbett, who is the subject of another complaint.

Rep. Dobson received government payments of more than \$90,000 from January 1, 2017 to June 30, 2020 for housing, meals and travel connected to legislative meetings but those expenses were largely paid by his campaign. For example, Rep. Dobson charged the government more than \$50,000 in this period for housing, but his campaign paid \$49,622 for his Raleigh apartment's rent, furnishing and utilities and for hotel rooms in the Raleigh area after he moved out of the apartment in 2019. This total includes housing payments of \$2,235 made after the Legislative Ethics Committee issued Ethical Principle and Guideline 11 on May 20, 2020. In addition, Dobson collected more than \$18,000 from the General Assembly for mileage, even though his campaign committee paid \$17,091 for his "gas" over the 42-month period, or more than \$400 a month. This includes \$283 for gas after May 20.

Rep. Dobson repeatedly took action in his official capacity to request, claim and accept payments from the public treasury for expenses that he knew were being paid by another source, namely his campaign. The exceptionally large sum of public money involved in his wrongdoing requires attention. It is difficult to see how the Legislative Ethics Committee cannot recognize his actions as unethical and a violation of state law that merits investigation and discipline in accordance with NCGS 138A-31, NCGS 120-102 or other provisions. In addition, he continued to take government subsistence and travel payments that were paid by another source after May 20, 2020 in violation of Ethical Principle and Guideline 11.

I am asking the members of the Legislative Ethics Committee to have the courage to enforce the State Government Ethics Act and Legislative Ethics Act, declare the actions of Rep. Dobson unethical, investigate and seek repayment of improperly obtained state funds as required of this Committee by NCGS 120-102(a)(8), and take whatever steps are appropriate to discipline a member of the General Assembly. Let me

be clear: I am not asking the Committee to retroactively apply Ethical Principle and Guideline 11. Dobson's actions after May 20, 2020 are clearly covered by that Guideline, **and** actions before that date are covered by state laws that prohibit legislators from taking official action, including an administrative decision, to request, charge or claim state funds for their private gain and for failing to repay those funds to the state. The Committee has an obligation under NCGS 120-102(a)(8) to "investigate," not just debate, "[u]pon receipt of information that a legislator owes money to the State. . . ."

4. Provide the name(s) and contact information, if known, of any other person(s) who may have information that would support your claim.

Documents with Legislative Services Office and State Board of Elections Campaign Finance Office; see sample of information in attachment to this complaint.

5. State whether the current legislator, and conduct described in Question 3 above, are or have been the subject of another complaint or proceeding of any kind. If so, state the place when and where the other complaint was filed and its current status, if known.

NONE

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:

Documentation of subsistence and travel payments from the Legislative Services Office and Campaign Finance disclosure reports filed with the State Board of Elections.

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: _____

Typed or Printed Notary Public Name: _____

My Commission Expires: _____

HOUSING EXPENSES FOR LEGISLATIVE MEETINGS PAID BY REP. JOSH DOBSON'S CAMPAIGN

PAYEE	CITY	DATE	AMOUNT	PURPOSE
HAMPTON INN	RALEIGH	1/5/2017	152.95	HOTEL
HAMPTON INN	RALEIGH	1/6/2017	150.45	HOTEL
ST. MARY'S SQUARE APARTMENTS	RALEIGH	1/12/2017	75.00	KEY DEPOSIT FOR RALEIGH RES.
HYATT PLACE NORTH RALEIGH	RALEIGH	1/17/2017	257.07	HOTEL
ST. MARY'S SQUARE APARTMENTS	RALEIGH	1/17/2017	100.00	PARKING PASS RALEIGH RES.
ST. MARY'S SQUARE APARTMENTS	RALEIGH	1/18/2017	1,100.84	RENT FOR RALEIGH RESIDENCE
ROOMS TO GO	RALEIGH	1/19/2017	1,832.84	FURNISHINGS FOR RALEIGH APT.
HAMPTON INN	RALEIGH	1/23/2017	145.45	HOTEL
E-RENTER PLAN	IRVINE	1/23/2017	143.39	INSURANCE FOR RALEIGH APT.
TARGET	RALEIGH	1/23/2017	177.11	FURNISHINGS FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	2/3/2017	1,109.00	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	2/27/2017	50.31	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	3/7/2017	1,127.99	RENT FOR RALEIGH RESIDENCE
Aggregated Non-Media Expenditure		3/31/2017	49.68	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	4/7/2017	1,276.88	RENT FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	5/5/2017	1,119.93	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	5/15/2017	90.80	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	6/7/2017	1,227.19	RENT FOR RALEIGH RESIDENCE
Aggregated Non-Media Expenditure		6/23/2017	40.70	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	7/5/2017	1,122.08	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	7/20/2017	58.72	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	8/7/2017	1,123.20	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	9/5/2017	56.50	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	9/14/2017	1,174.63	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	10/2/2017	51.66	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	10/11/2017	1,173.52	RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	11/2/2017	1,118.09	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	11/6/2017	71.00	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	12/4/2017	1,118.70	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	12/18/2017	58.04	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	1/3/2018	1,124.29	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	1/29/2018	93.59	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	2/7/2018	1,130.11	RENT FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	3/7/2018	1,129.89	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	3/26/2018	138.57	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	4/3/2018	1,130.84	RENT FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	5/2/2018	1,128.63	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	5/5/2018	124.74	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	6/1/2018	1,160.19	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	6/23/2018	53.07	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	7/5/2018	1,342.36	RENT FOR RALEIGH RESIDENCE

ST. MARY'S SQUARE APARTMENTS	RALEIGH	8/6/2018	1,131.79	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	8/25/2018	130.30	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	9/6/2018	1,200.00	RENT FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	10/7/2018	1,143.86	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	10/25/2018	119.83	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	11/8/2018	1,212.12	RENT FOR RALEIGH RESIDENCE
Aggregated Non-Media Expenditure		11/8/2018	0.31	ADDITIONAL PAYMENT FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	12/4/2018	1,158.85	RENT FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	1/3/2019	1,318.39	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	1/5/2019	203.50	UTILITIES FOR RALEIGH RESIDENCE
ST. MARY'S SQUARE APARTMENTS	RALEIGH	2/6/2019	1,272.77	RENT FOR RALEIGH RESIDENCE
DUKE ENERGY	CHARLOTTE	2/20/2019	99.97	UTILITIES FOR RALEIGH RESIDENCE
U-HAUL MOVING & STORAGE AT CAPITAL BLVD	RALEIGH	2/22/2019	408.15	MOVE OUT OF RALEIGH RESIDENCE
U-HAUL NEIGHBORHOOD DEALER	MORGANTON	2/24/2019	74.46	MOVE OUT OF RALEIGH RESIDENCE
HAMPTON INN RALEIGH-CAPITAL BLVD NORTH	RALEIGH	2/25/2019	472.26	LEGISLATIVE DUTIES
HAMPTON INN & SUITES RALEIGH/CRABTREE VALLEY	RALEIGH	3/1/2019	988.65	LEGISLATIVE DUTIES
HYATT PLACE NORTH RALEIGH	RALEIGH	3/8/2019	506.25	LEGISLATIVE DUTIES
HAMPTON INN RALEIGH-CAPITAL BLVD NORTH	RALEIGH	3/15/2019	578.68	LEGISLATIVE SESSION
HAMPTON INN RALEIGH-CAPITAL BLVD NORTH	RALEIGH	3/16/2019	139.83	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	3/26/2019	208.39	LEGISLATIVE SESSION
HYATT PLACE NORTH RALEIGH	RALEIGH	3/31/2019	472.23	LEGISLATIVE SESSION
HAMPTON INN RALEIGH-CAPITAL BLVD NORTH	RALEIGH	4/4/2019	140.43	LEGISLATIVE SESSION
LA QUINTA INN & SUITES RALEIGH CRABTREE	RALEIGH	4/7/2019	493.76	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	4/13/2019	111.62	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	4/18/2019	357.42	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	4/26/2019	346.15	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	5/3/2019	321.12	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	5/7/2019	100.35	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	5/16/2019	244.84	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	5/24/2019	323.12	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	6/6/2019	242.84	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	6/14/2019	80.28	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	6/15/2019	329.62	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	6/16/2019	111.62	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	6/17/2019	111.62	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	6/22/2019	483.68	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	7/1/2019	340.55	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	7/7/2019	240.84	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	7/11/2019	80.28	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	7/15/2019	240.84	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	7/21/2019	272.18	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	7/25/2019	80.28	LEGISLATIVE SESSION
HOLIDAY INN	RALEIGH	8/1/2019	466.61	LEGISLATIVE SESSION

LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	8/8/2019	240.84	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	8/13/2019	160.56	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	8/19/2019	80.28	LEGISLATIVE SESSION
FOUR POINTS SHERATON RALEIGH	RALEIGH	9/2/2019	132.50	HOTEL FOR SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	9/12/2019	89.07	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	9/17/2019	80.28	LEGISLATIVE SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	10/24/2019	92.18	HOUSE HEALTH/MEDICAID TRANSFORMATION MEETING
HYATT PLACE NORTH RALEIGH	RALEIGH	10/28/2019	134.77	HOTEL FOR SESSION
FOUR POINTS SHERATON RALEIGH	RALEIGH	10/30/2019	246.88	LEGISLATIVE MEETINGS IN RALEIGH
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	12/4/2019	92.18	LEGISLATIVE MEETINGS AT THE GEN ASSEMBLY
HOLIDAY INN	RALEIGH	1/14/2020	314.82	SESSION
HOLIDAY INN	RALEIGH	2/10/2020	343.38	COMMITTEE AND LEGISLATIVE MEETINGS
HOLIDAY INN	RALEIGH	2/10/2020	343.38	COMMITTEE AND LEGISLATIVE MEETINGS
HOLIDAY INN RALEIGH NORTH	RALEIGH	2/18/2020	146.62	LEGISLATIVE MTGS AT GEN. ASSEMBLY
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	3/26/2020	111.62	LEGISLATIVE MEETINGS
HILTON GARDEN INN RALEIGH/CRABTREE VALLEY	RALEIGH	4/28/2020	401.40	SESSION
HILTON GARDEN INN RALEIGH/CRABTREE VALLEY	RALEIGH	5/1/2020	104.92	SESSION
DOUBLETREE BY HILTON RALEIGH-CARY	CARY	5/24/2020	285.90	SESSION
DOUBLETREE BY HILTON RALEIGH-CARY	CARY	5/28/2020	212.00	SESSION
HILTON GARDEN INN RALEIGH-CARY	CARY	6/2/2020	358.08	SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	6/9/2020	188.02	SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	6/10/2020	222.18	SESSION
HOLIDAY INN RALEIGH NORTH	RALEIGH	6/14/2020	404.31	SESSION
HOLIDAY INN RALEIGH NORTH	RALEIGH	6/18/2020	123.96	SESSION
HOLIDAY INN RALEIGH NORTH	RALEIGH	6/18/2020	126.91	SESSION
HOLIDAY INN RALEIGH NORTH	RALEIGH	6/19/2020	112.12	SESSION
LA QUINTA INN & SUITES DOWNTOWN NORTH	RALEIGH	6/24/2020	201.80	SESSION
TOTAL CAMPAIGN PAYMENTS FOR HOUSING			\$ 49,622	

PAYMENTS REQUESTED FROM LEGISLATIVE SERVICES FOR REP. JOSH DOBSON			
HOUSING & MEAL SUBSISTENCE PER DIEM	2017	209 DAYS	\$ 21,736
	2018	189 DAYS	19,656
	2019	291 DAYS	30,264
	To 6/30/2020	Min. 27 DAYS	2,808
TOTAL (HOUSING: \$50,120; MEALS: \$24,344)			\$ 74,464
TRAVEL NON-TAXABLE PAYMENT	2017		5,427
	2018		6,051
	2019		5,661
	To 6/30/2020	Min.	964
TOTAL			\$ 18,103