

Please complete this form to the fullest extent possible.

MAR 07 2019

The following sections are required and must be completed in full:

I. Identity of Complainant(s)—page 1 | III. Violation(s) Alleged—page 3 | VI. ENFORCEMENT COMMISSION

### I. IDENTITY OF COMPLAINANT(S)

RECEIVED  
STATE ELECTIONS

MAR 07 2019

ENFORCEMENT COMMISSION

#### COMPLAINANT'S NAME

First Name Justin	MI	Last Name Elicker	Suffix
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#### COMPLAINANT'S STREET ADDRESS

Address 821 Orange Street
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City New Haven	State CT	Zip Code 06511
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#### COMPLAINANT'S TELEPHONE NUMBER

Home 203-500-2969	Work	Cell 203-500-2969
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#### COMPLAINANT'S EMAIL ADDRESS

JustinElicker@gmail.com
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#### COMPLAINANT'S NAME

First Name	MI	Last Name	Suffix
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#### COMPLAINANT'S STREET ADDRESS

Address
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City	State	Zip Code
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#### COMPLAINANT'S TELEPHONE NUMBER

Home	Work	Cell
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#### COMPLAINANT'S EMAIL ADDRESS

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#### COMPLAINANT'S NAME

First Name	MI	Last Name	Suffix
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#### COMPLAINANT'S STREET ADDRESS

Address
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City	State	Zip Code
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#### COMPLAINANT'S TELEPHONE NUMBER

Home	Work	Cell
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#### COMPLAINANT'S EMAIL ADDRESS

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**II. IDENTITY OF RESPONDENT(S)**

**RESPONDENT'S NAME** (If known, otherwise write "unknown")

First Name Toni	MI	Last Name Harp	Suffix
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**RESPONDENT'S STREET ADDRESS** (If known)

Address 71 Edgewood Way			
City New Haven	State CT	Zip Code 06515	

**RESPONDENT'S TELEPHONE NUMBER** (If known)

Home	Work	Cell
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**RESPONDENT'S EMAIL ADDRESS** (If known)

tonijewelharp@gmail.com	<b>STATUTE(S) VIOLATED</b> (If known) § 9-622 (10), but not limited to
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**RESPONDENT'S NAME** (If known, otherwise write "unknown")

First Name Jonathan	MI	Last Name Wilson	Suffix
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**RESPONDENT'S STREET ADDRESS** (If known)

Address 204 Alden Avenue, #3			
City New Haven	State CT	Zip Code 06515	

**RESPONDENT'S TELEPHONE NUMBER** (If known)

Home 203-641-9102	Work	Cell
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**RESPONDENT'S EMAIL ADDRESS** (If known)

jpw46golfer@yahoo.com	<b>STATUTE(S) VIOLATED</b> (If known) § 9-603, 607, 608, 613, 621, 622
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**RESPONDENT'S NAME** (If known, otherwise write "unknown")

First Name	MI	Last Name	Suffix
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**RESPONDENT'S STREET ADDRESS** (If known)

Address			
City	State	Zip Code	

**RESPONDENT'S TELEPHONE NUMBER** (If known)

Home	Work	Cell
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**RESPONDENT'S EMAIL ADDRESS** (If known)

	<b>STATUTE(S) VIOLATED</b> (If known) §
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Copy and attach page(s) for additional respondents if necessary.  
 Please check "See attached Additional Respondent List" and list the number of pages.

See attached \_\_\_\_\_ Additional Respondent List pages  
Number of Pages



**III. VIOLATION(S) ALLEGED**

**DATE(S) OF ALLEGED VIOLATION(S) (If known)**

June 2017 through January 10, 2019 and ongoing

**CONCISE STATEMENT OF FACTS**

Please be as specific as possible with regard to time, place, and the individual(s) taking actions or failing to act, and in describing their actions as well as other witnesses or persons involved. If applicable, please clearly refer to the names of identified respondents, witnesses, and attached evidence (e.g., See Evidentiary Attachment B.). If you have identified more than one respondent, please identify which respondent is alleged to have committed which action and which specific alleged violation of the statutes.

If you are unable to provide the specific identity of any witnesses in the following "Witnesses" section, please provide as much identifying information as possible in the below "Concise Statement of Facts."

The respondent(s) allegedly violated the law as follows:

Please see attached Additional 3 Pages of Statement of Facts

*Use attached page(s) for additional statement of facts if necessary.  
Please check "See attached Additional Statement of Facts" and list the number of pages.*

See attached 3 Additional Statement of Facts pages  
Number of Pages

**Respondents:**

**Toni Harp, Candidate**

**Jonathan Wilson, Treasurer**

**I allege and submit a complaint that:**

- (1) The Harp 2017 campaign committee has violated CT state statute by improperly filing Form 20 Committee Reports on July 10, 2018; October 10, 2018; and January 10, 2019, whereas Deficit filings were required instead on the 7<sup>th</sup> of each month.
- (2) The committee also violated the law by filing an April 10, 2018 Form 20 Report nearly 3 months late, on Jun 26, 2018 at 3:33pm; additionally, this should have been an April 7, 2018 Deficit Filing.
- (3) The committee failed to file its special deficit filing in a timely manner on February 7, 2018, and instead filed it on June 26, 2018, also at 3:33pm. The Committee Treasurer falsified the campaign paperwork on June 26, 2018 to have the date read February 7, 2018.
- (4) The committee failed to file subsequent required deficit reports on March 7, 2018, and on the 7<sup>th</sup> day of all subsequent months when more than \$500 was raised or spent to resolve its deficit. Because of regular payments made by the Harp 2017 committee, deficit reports were due on March 7, 2018, April 7, 2018, May 7, 2018; June 7, 2018.
- (5) Additionally, no reports were filed on July 7, 2018; August 7, 2018; September 7, 2018; October 7, 2018; November 7, 2018; December 7, 2018, and January 7, 2019 as required by law and as evidenced by the funds raised and reported in the egregiously late Oct 10, 2018 and more than one-month late January 10, 2019 deficit filings showing monetary receipts of \$10,641.25 and \$8,300.00 respectively.
- (6) The Harp 2017 campaign committee also failed to submit any listing of donors, dates or amounts of the origin of \$41,520 in funds raised reported in the January 10, 2018 filing. This egregious lack of transparency does not allow the SEEC or residents to review aggregate and impermissible contributions, many of which may have exceeded individual contribution limits in an election cycle.
- (7) The Harp 2017 campaign committee also failed to submit any listings of donors, dates or amounts of funds raised on the April 10, 2018 filing or the February 7, 2018 filing, both of which were submitted 3 months late on June 26, 2018. This continued egregious lack of transparency on the origin of the \$24,956.59 in contributions does not allow the SEEC or residents to review aggregate and impermissible contributions, many of which may have clearly exceeded individual contribution limits in an election cycle.

- (8) The June 10, 2018 filing (which should have been a June 7, 2018 Deficit Filing) was filed 4 months late, on February 20, 2019 at 3:55PM, a violation of state statute. Further, none of the contributors of the \$16,085 reported on this June 10, 2018 filing are listed, as required by state statute. This is an additional violation of law, and this continued egregious lack of transparency does not allow the SEEC or residents to review aggregate and impermissible contributions, many of which may have exceeded individual contribution limits in an election cycle.
- (9) The October 10, 2018 filing (which should have been an October 7, 2018 Deficit Filing) was filed 4 months late, on February 20, 2019 at 3:55PM, a violation of state statute. Further, none of the contributors of the \$2,641.25 reported on this Oct 2018 filing are listed, as required by state statute. This is an additional violation of law, and this lack of transparency does not allow the SEEC or residents to review aggregate and impermissible contributions, many of which may have exceeded individual contribution limits in an election cycle.
- (10) The January 10, 2019 filing (which should have been a January 7, 2019 Deficit Filing) was filed more than one-month late, on February 20, 2019 at 3:55PM, a violation of state statute. Further, none of the contributors of the \$8,300 reported on this Oct 2018 filing are listed, as required by state statute. This is an additional violation of law, and this lack of transparency does not allow the SEEC or residents to review aggregate and impermissible contributions, many of which may have exceeded individual contribution limits in an election cycle.
- (11) Further, Jonathan Wilson, the Harp 2017 treasurer, failed to file a termination filing before filing SEEC Form 1 Committee Registration paperwork of the Harp 2019 committee and was for the period of one week a treasurer of two committees, in violation of state statute.
- (12) Jonathan Wilson, the Harp 2017 treasurer, falsified committee termination papers and submitted them to the City Clerk on February 20, 2019, but dated the paperwork as February 14, 2019 to avoid serving as the treasurer of two committees at the same time. Nevertheless, his filing of new committee paperwork on February 14, 2019 for the Harp 2019 committee put him in violation of state campaign finance law and any contributions received or expenses incurred or made from February 14, 2019 through February 20, 2019 were illegal.
- (13) Toni Harp did unlawfully appoint Jonathan Wilson the treasurer of her Harp 2019 committee in knowing violation of the law because he was concurrently the treasurer of her active Harp 2017 committee.

In addition to the above, I ask the SEEC Compliance Unit to review the following:

1. Did Treasurer Jonathan Wilson fail to file required SEEC Form 20 Reports on March 7, 2018, April 7, 2018, May 7, 2018, and on the 7th day of each new

- month when more than \$500 was raised or spent? If so what is the remedy/penalty?
2. Did Treasurer Jonathan Wilson improperly file 2018 Form 20 quarterly reports, and what should the penalty/remedy be (1) for improper reports being filed and (2) their egregiously late filing dates?
  3. Did Treasurer Jonathan Wilson fail to list contributions on multiple Form 20 reports in 2018 and 2019? If so what is the remedy/penalty?
  4. Did Treasurer Jonathan Wilson fail to terminate the committee in a timely fashion and was he illegally the treasurer of two committees at the same time? If so what is the remedy/penalty?
  5. What responsibility does Toni Harp as Candidate bare in appointing Jonathan Wilson as treasurer of her Harp 2019 committee, given that (1) she knew, on Feb 14 2019, that her Harp 2017 committee had not been terminated and that (2) she knew, on Feb 14 2019, that her Harp 2017 committee had not filed any deficit filings after Feb 7, 2018?



**IV. WITNESSES**

**WITNESS'S NAME (If known)**

First Name	MI	Last Name	Suffix
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**WITNESS'S STREET ADDRESS (If known)**

Address

City

State

Zip Code

**WITNESS'S TELEPHONE NUMBER (If known)**

Home	Work	Cell
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**WITNESS'S EMAIL ADDRESS (If known)**

**WITNESS'S NAME (If known)**

First Name	MI	Last Name	Suffix
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**WITNESS'S STREET ADDRESS (If known)**

Address

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State

Zip Code

**WITNESS'S TELEPHONE NUMBER (If known)**

Home	Work	Cell
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**WITNESS'S EMAIL ADDRESS (If known)**

**WITNESS'S NAME (If known)**

First Name	MI	Last Name	Suffix
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**WITNESS'S STREET ADDRESS (If known)**

Address

City

State

Zip Code

**WITNESS'S TELEPHONE NUMBER (If known)**

Home	Work	Cell
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**WITNESS'S EMAIL ADDRESS (If known)**

Copy and attach page(s) for additional witnesses if necessary.  
 Please check "See attached Additional Witness List" and list the number of pages.

See attached \_\_\_\_\_ Additional Witness List pages  
Number of Pages



**V. EVIDENCE**

**ATTACHED DOCUMENTARY OR REAL EVIDENCE**

Please identify each attachment by **number of pages, title, author and date** if applicable. Records not identified as attachments shall not be considered a part of the complaint. Please do not provide a website listing as evidence, as this information is subject to change. If you wish to provide Internet or other video or audio communications as evidence, please provide a printed or electronic copy, as appropriate, and list it as an exhibit.

Under **"How Acquired"** please identify your source for the evidence (e.g., delivery from an individual, Internet website, public flyer location). If the source is an individual, please identify the individual in the witness list. If the source is a publication, such as a newspaper, please identify the publication's name and date of the publication.

**EVIDENTIARY ATTACHMENT**

Title 9 HARP 2017 April 10 2018 Filing Q1_2018		Number of Pages 19
Author Jonathan Wilson		Date of Publication June 26, 2018
How Acquired FOI		Date Acquired Feb 7, 2019

**EVIDENTIARY ATTACHMENT**

Title 8 HARP 2017 April 10 2018 Filing Q1_2018_Deficit		Number of Pages 17
Author Jonathan Wilson		Date of Publication June 26 2018
How Acquired FOI		Date Acquired Feb 7, 2019

**EVIDENTIARY ATTACHMENT**

Title 7 HARP 2017 Jan 10 2018 Filing Q4_2017		Number of Pages 37
Author Jonathan Wilson		Date of Publication Jan 10, 2018
How Acquired FOI		Date Acquired Feb 7, 2019

**EVIDENTIARY ATTACHMENT**

Title 6 Harp 2017 7th Day Preceding General		Number of Pages 25
Author Jonathan Wilson		Date of Publication Oct. 31, 2017
How Acquired FOI		Date Acquired Feb 7, 2019

*Copy and attach page(s) for additional evidence if necessary.  
 Please check "See attached Additional Evidence List" and list the number of pages.*

See attached 2 Additional Evidence List pages  
Number of Pages





**V. EVIDENCE**

**ATTACHED DOCUMENTARY OR REAL EVIDENCE**

Please identify each attachment by **number of pages, title, author and date** if applicable. Records not identified as attachments shall not be considered a part of the complaint. Please do not provide a website listing as evidence, as this information is subject to change. If you wish to provide Internet or other video or audio communications as evidence, please provide a printed or electronic copy, as appropriate, and list it as an exhibit.

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**EVIDENTIARY ATTACHMENT**

Title 10 HARP 2017 July 10 2018 Filing Q2_Deficit		Number of Pages 20
Author Jonathan Wilson		Date of Publication Feb 20, 2019
How Acquired FOI		Date Acquired Feb 21, 2019

**EVIDENTIARY ATTACHMENT**

Title 11 HARP 2017 Oct 10 2018 Filing Q3_Deficit		Number of Pages 17
Author Jonathan Wilson		Date of Publication Feb 20, 2019
How Acquired FOI		Date Acquired Feb 21, 2019

**EVIDENTIARY ATTACHMENT**

Title 12 HARP 2017 Jan 10 2018 Filing Q4_Deficit		Number of Pages 20
Author Jonathan Wilson		Date of Publication Feb 20, 2019
How Acquired FOI		Date Acquired Feb 21, 2019

**EVIDENTIARY ATTACHMENT**

Title 13 Harp 2017 Termination		Number of Pages 17
Author Jonathan Wilson		Date of Publication Feb 20, 2019
How Acquired FOI		Date Acquired Feb 21, 2019

*Copy and attach page(s) for additional evidence if necessary.  
 Please check "See attached Additional Evidence List" and list the number of pages.*

See attached 1 Additional Evidence List pages  
Number of Pages



**V. EVIDENCE**

**ATTACHED DOCUMENTARY OR REAL EVIDENCE**

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Under **"How Acquired"** please identify your source for the evidence (e.g., delivery from an individual, Internet website, public flyer location). If the source is an individual, please identify the individual in the witness list. If the source is a publication, such as a newspaper, please identify the publication's name and date of the publication.

**EVIDENTIARY ATTACHMENT**

Title 1 Registration Harp 2019		Number of Pages 5
Author Jonathan Wilson		Date of Publication Feb 14, 2019
How Acquired FOI		Date Acquired Feb 15, 2019

**EVIDENTIARY ATTACHMENT**

Title		Number of Pages
Author		Date of Publication
How Acquired		Date Acquired

**EVIDENTIARY ATTACHMENT**

Title		Number of Pages
Author		Date of Publication
How Acquired		Date Acquired

**EVIDENTIARY ATTACHMENT**

Title		Number of Pages
Author		Date of Publication
How Acquired		Date Acquired

*Copy and attach page(s) for additional evidence if necessary.  
 Please check "See attached Additional Evidence List" and list the number of pages.*

See attached \_\_\_\_\_ Additional Evidence List pages  
Number of Pages



**VI. CERTIFICATION**

- 1) Each Complainant must sign a separate page and each signature must be separately certified. This complaint will not be considered filed without the name, address, and original **certified** signature of at least one Complainant. Mail or hand-deliver this complaint to:

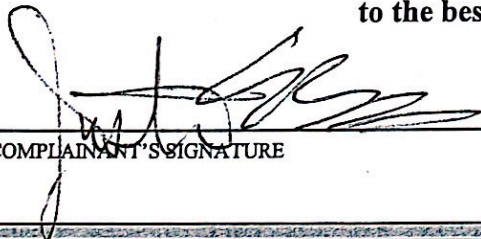
State Elections Enforcement Commission  
20 Trinity Street, Suite 101  
Hartford, CT 06106

- 2) Once filed, this complaint may not be withdrawn by the Complainant(s) except by a vote of the State Elections Enforcement Commission.
- 3) I am aware that criminal penalties may be imposed upon any Complainant who, under penalty of false statement, knowingly files a false complaint.
- 4) The State Elections Enforcement Commission's investigation of a complaint is confidential unless and until the State Elections Enforcement Commission votes to authorize an investigation of a complaint. Until such a vote, neither the Commission nor its staff will release or confirm any information about the complaint except upon written request of a treasurer, deputy treasurer, chairperson or candidate affiliated with a committee that is the subject of the complaint or preliminary investigation.

Guides to the elections laws are available at <http://www.ct.gov/seec>  
Connecticut General Statutes are available at <http://www.cga.ct.gov>

**CERTIFICATION**

I solemnly swear (or affirm) that the above statement is true and accurate to the best of my knowledge and belief.

  
COMPLAINANT'S SIGNATURE

3/7/2019  
DATE (mm/dd/yyyy)

Sworn and subscribed before me on this 7<sup>th</sup> day of March, 2019

Seal

  
SIGNATURE OF PERSON ADMINISTERING THE OATH

Jessica Drury  
NAME OF PERSON ADMINISTERING THE OATH (Please Print)

Notary Public  
TITLE OF PERSON ADMINISTERING THE OATH

**JESSICA DRURY**  
NOTARY PUBLIC  
MY COMMISSION EXPIRES FEB. 28, 2023

Note: This oath may be administered by anyone authorized by Section 1-24 of the Connecticut General Statutes, which includes: notaries public; justices of the peace; town clerks and assistant town clerks; judges and clerks of any court; and attorneys who are Commissioners of the Superior Court of Connecticut.

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