



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, WRS Tennessee Tower, 26th Floor, 312 Rosa L. Parks Avenue, 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 Ken Yager
Address 425 Rep. John Lewis Way N. Suite 704
City Nashville State TN Zip 37243
Phone 615.741.1449 E-Mail Sen.Ken.Yager@capitol.tn.gov

Complaint

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

Over the past several weeks, I have seen numerous text messages delivered into Senator Lundberg's district that contain lies, misleading statements, and blatant falsehoods. These text messages have been funded by a group called the East Tennessee Conservatives PAC.

While dirty campaign tricks are an unfortunate part of the political process, I am concerned this is something far more serious. A quick review shows the PAC's Treasurer is also the Treasurer of Congresswoman Diana Harshbarger. Harshbarger's son, Bobby, is running against Sen. Lundberg.

I am concerned there is collusion between the Harshbarger campaign (both) and the PAC. In addition to collusion between the campaigns, I believe there may also be an effort to skirt campaign finance limits.

I am asking the bureau to investigate this to determine if an ethical and/or registry violations have been - and are - occurring.

Signature *Ken Yager*

Date 4/25/24

Sworn to and Subscribed before me in the State of Tennessee

This 25th Day of April 2024

Luke Gustafson
Notary Public

5/25/2025
Date Commission expires

