

ELECTION LAW COMPLAINT

OFFICE OF THE WEST VIRGINIA
SECRETARY OF STATE
1900 Kanawha Blvd. E.
Building 1, Suite 157-K
Charleston, WV 25305-0770



Telephone: (304) 558-6000
Toll-Free: (877) FRAUD-WV
Fax: (304) 558-0900
Website: www.sos.wv.gov
Email: InvestigationSupport@wvsos.gov

THIS IS AN OFFICIAL FORM REQUIRING A SWORN DECLARATION.

Any person who knowingly makes a false statement or declaration on this form, or advises another person to make a false statement or declaration, is subject to criminal prosecution under W. Va. Code § 3-9-3.

I. Instructions

1. This Complaint form must be notarized.
2. All fields are required. Incomplete forms may be dismissed.
3. Supporting evidence, documentation, witness names, contact information must be submitted with this Complaint.
4. By law, this Complaint must be filed within 30 days of the alleged violation(s), or within 30 days that the alleged violation(s) were reasonably discovered, whichever is later. Complaints filed after the deadline shall be dismissed.
5. Send completed and notarized Complaints to InvestigationSupport@wvsos.gov, via U.S. Mail to the Secretary of State's Office address provided on this form, or fax to (304) 558-0900, Attn: Investigations.

II. Parties

All fields below are required:

Today's Date: 07/25/2024 Date of Alleged Violation(s): 09/01/23 to 07/25/24
Complainant Name: Ken Reed Phone Number: [REDACTED]
Address: 11348 Martinsburg Road County: Morgan
City: Hedgesville State: WV Zip: 25427
Respondent(s) Name: Kris Warner/Mark Scott/Conservative Policy Action PAC
Elected Position Sought: WV Secretary of State N/A ☐
Current Elected Position: _____ N/A ☒

III. Allegations (select all that apply)

- | | |
|--|---|
| <input type="checkbox"/> Absentee Fraud | <input type="checkbox"/> False Swearing |
| <input type="checkbox"/> Assisting Voter Illegally | <input type="checkbox"/> False Voter Registration |
| <input type="checkbox"/> Ballot Harvesting | <input type="checkbox"/> Illegal/Double Voting |
| <input type="checkbox"/> Ballot Tampering/Theft | <input type="checkbox"/> Vote Buying |
| <input checked="" type="checkbox"/> Campaign Finance | <input type="checkbox"/> Voter Intimidation |
| <input type="checkbox"/> Disenfranchisement | <input type="checkbox"/> Voting Machine Tampering |
| <input type="checkbox"/> Electioneering | <input type="checkbox"/> Other _____ |

Describe the allegation(s) in detail below or attach a separate sheet:

On July 24th, 2024 I became aware of the Metro News Story by Brad McElhinny about Mark Scott who was the chairman of the Conservative Policy Action PAC and also the WV Administration Secretary. As reported this PAC focused on Kris Warner's candidacy for Secretary of State. I suspect there was collusion between Mr. Scott and Mr. Warner throughout the campaign along with potential unethical dealings with state contracts. As the FEC investigates Mr. Scott and the PAC, I believe there should be a State investigation into the connection between Mr. Scott and Mr. Warner and Mr. Warner and the State EDA since Mr. Warner did not resign from his position to run for state office. There is massive conflict of interest going on since both Mr. Scott and Mr. Warner worked for the state with power over multiple contracts while soliciting funds.

(continued/see attached) ☐

IV. Witness(es):

(additional witnesses/see attached) ☐

1. _____
Name

Phone

Address

City/State/Zip

2. _____
Name

Phone

Address

City/State/Zip

3. _____
Name

Phone

Address

City/State/Zip

V. Requested Relief

DISMISSAL NOTICE: The Secretary of State does not have authority to overturn any election outcome or declare any ballots cast or voter participation valid/invalid. Persons seeking to challenge an election outcome or result must either file an Election Contest under the procedures in Chapter 3 of the West Virginia Code or seek judicial resolution where permitted by law.

Complaints requesting relief that cannot be granted by the Secretary of State shall be dismissed pursuant to W. Va. Code R. § 153-21-5.5.

Relief requested:

Investigate along with the FEC to see if any state laws were broken by Mr. Scott, Mr. Warner, and the PAC. If laws were broken then to be prosecuted to the fullest extent of the law.

VI. Sworn Declaration (signature required)

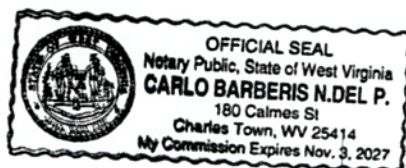
I, Kenneth Reed (Complainant's Name), do hereby declare that all information contained in this Complaint is true and accurate to the best of my knowledge. I understand that knowingly making any false statement in this Complaint could result in a criminal penalty for false swearing.

Kenneth Reed

Complainant Signature

STATE OF WEST VIRGINIA, COUNTY OF BERKELEY

Signed and sworn to (or affirmed) before me on this 25TH day of JULY 2024, by:



Notary Stamp

CARLO BARBERIS N DEL P
Notary Public (printed)

Signature [Signature]

My Commission Expires: 11/03/27