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Public Disclosure Commission

**BEFORE THE WASHINGTON STATE PUBLIC DISCLOSURE
COMMISSION**

COMPLAINT

This is a complaint against Justin Kover, aka harbormasterlief, "Matthew Green" and "MatthewDGreen." The complainant is Thaddeus B. Curtz, Jr.

Justin Kover is a resident of Thurston County. His voter registration address is: 522 Lilly Rd NE Apt 752, Olympia WA 98506.

Count 1: Justin Kover violated RCW 42.17.510(1) when he distributed, mailed, and published political advertising that did not contain a sponsor's name and address.

Count 2: Justin Kover violated RCW 42.17.510(1) when he used an assumed name for the sponsor of political advertising.

Count 1 is supported by the Declaration of Thaddeus B. Curtz, Jr. and the facts provided therein. Justin Kover distributed, mailed, and published an anonymous political advertisement in the form of a flyer beginning October 5, 2011 and continuing for two weeks or more thereafter. The anonymous political advertisement did not contain a sponsor's name and address.

Count 2 is supported by the Declaration of Thaddeus B. Curtz, Jr. and the facts provided therein. Justin Kover sponsored political advertising on October 9, 2011 under the assumed name "Matthew Green."

Complainant has provided the Declaration of Thaddeus B. Curtz, Jr. and attachments to support the complaint. Complainant has also provided the Declaration of Stephen Buxbaum to support the complaint.

Witnesses are listed in the Declaration of Thaddeus B. Curtz, Jr.

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Certification

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In signing this complaint:

- I have provided all information, documents and other evidence of which I am aware;
- If I become aware of additional information, documents or evidence related to my complaint, I will promptly provide it to the PDC; and,
- I am providing the PDC current information on how to contact me, and will promptly update that information if it changes.

Your name (print or type) Thaddens B. Curtz, Jr.Street address 113 17th Ave SECity, state and zip code Olympia, WA 98501Telephone number (including area code) 360-352-2209E-mail address (optional) curtztenuprometheus.com

Oath

Required for complaints against elected officials or candidates for elective office:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this complaint is complete, true and correct to the best of my knowledge and belief.*

Your signature Thaddens B. Curtz, Jr.Date signed March 13, 2012

Place signed (city and county)

City Olympia County Thurston

Attachments

☒ Check here if you are attaching copies of documentary evidence or extra pages explaining your complaint.

*RCW 9A.72.040 says that "(1) A person is guilty of false swearing if he makes a false statement which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."