

**RECEIVED**  
FEDERAL ELECTION COMMISSION  
APRIL 15, 2024 8:05 AM  
**OFFICE OF GENERAL COUNSEL**

**SAMUEL A. MANLEY, JR.**

Greer, SC 29650

April 11, 2024

**MUR 8241**

Via Email to: [EnfComplaint@fec.gov](mailto:EnfComplaint@fec.gov)

FedEx to: Office of General Counsel | Federal Election Commission | 1050 First Street, NE  
| Washington, DC 20002

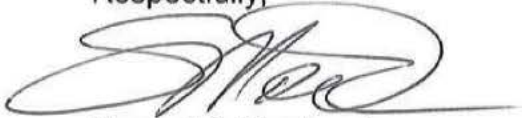
RE: Complaint Alleging Campaign Ethics Violations  
Complainant: Samuel A. Manley, Jr.  
Respondent: Congressman William Timmons

General Counsel,

Congressman William Timmons of South Carolina's 4th Congressional District has sent out two texts both without the necessary "paid for by" disclaimers as prescribed by federal law and ethics. Please see text images and the dates they were sent on the attached Exhibit 1.

Rep. Timmons sent other "William Timmons for Congress" texts from the same phone number on which he did include a "paid for by" disclaimer. This is evidence that this phone number is connected to the William Timmons for Congress campaign. Rep., Timmons clearly flouted federal legal and ethical standards by these egregious actions.

Respectfully,



Samuel A. Manley, Jr.  
Greenville County Resident

Enclosure

Sworn to before me this

11th day of April, 2024

Lisa Gicking  
Notary Public for South Carolina

My Commission expires Sept 27, 2027

Lisa Gicking  
Signature of Affiant



EXHIBIT 1



Text Message  
Wed, Nov 15 at 12:09 PM



Hello - this is Speaker  
Mike Johnson.

William Timmons is a  
strong, conservative  
fighter. We need him in  
Congress to keep  
delivering for the  
American people and  
help get our country



+1 (864) 765-0045 >

William is an asset to the Republican Conference - he's an experienced leader who gets things done, and his background as a prosecutor makes him a key leader in our Biden impeachment investigations.

I fully endorse his continued service in Congress.

Will you join me in supporting William? >>>

<https://elects.us/4x7abdeu>

Reply STOP to opt-out



Mon, Mar 18 at 2:31PM



**Mr. Baseball? More like  
Mr. Special Interest.**

**Adam Morgan took gifts  
from Blue Cross/Blue  
Shield, including a  
baseball hat and jersey -  
the same company that  
was sued for pushing  
vaccine mandates on its  
employees**





+1 (864) 765-0045

vaccine mandates on its employees.

And he's taken tens of thousands in CASH from big healthcare and special interest PACs - almost 40% of every dollar he raised in the State House. \$19,499.22 to be exact.

How do you spell fake?  
A-d-a-m.

Learn more about Adam Morgan's hypocrisy >>>  
[https://  
www.alltalkadam.com/  
post/adam-morgan-  
hypocrite](https://www.alltalkadam.com/post/adam-morgan-hypocrite)

Reply STOP to opt out.





+1 (864) 765-0045 >

Yet Adam's brother, who works for FORTIS, abstained from the same vote due to this massive conflict of interest. And if it was a CONFLICT OF INTEREST for a FORTIS employee and Morgan family member, it certainly was a conflict of interest for Adam Morgan!

Adam Morgan's vote to enrich his family was wrong. Call the SC House Ethics Committee at [803-734-3115](tel:803-734-3115) and ask them to investigate Adam Morgan immediately.