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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

REPORT

Review No. 13-6070

The Board of the Office of Congressional Ethics (the "Board"), by a vote of no less than four members, on February 27, 2014, adopted the following report and ordered it to be transmitted to the Committee on Ethics of the United States House of Representatives.

SUBJECT: Representative Steve Stockman

NATURE OF THE ALLEGED VIOLATION: In February 2013, Representative Steve Stockman accepted contributions to his congressional campaign committee, Friends of Congressman Steve Stockman, from two employees of his congressional office. Representative Stockman's congressional campaign committee subsequently filed Federal Election Commission ("FEC") reports identifying the contributions made by his congressional employees as having been made by family members of the employees.

In addition, Representative Stockman may have retained these two individuals as full-time employees in his congressional office during a period when those employees were only performing official duties on a part-time basis, and therefore not performing official duties commensurate with the compensation they received.

If Representative Stockman conspired to accept contributions to his congressional campaign committee from individuals who were employed by his congressional office, then he may have violated federal law and House rules.

If Representative Stockman made false statements and endeavored to impede the Office of Congressional Ethics ("OCE") inquiry when he filed Payroll Authorization Forms with the House Office of Payroll and Benefits in December 2013, purporting to document the termination of Mr. Posey and Mr. Dodd from his congressional staff on February 12, 2013, and their re-hiring on February 13, 2013, then he may have violated federal law and House rules.

If Representative Stockman's campaign committee filed FEC reports falsely identifying the contributions made by his congressional employees as having been made by family members of the employees, then he may have violated federal law and House rules.

If Representative Stockman compensated individuals as full-time employees in his congressional office when those individuals were performing official duties only on a part-time basis, then he may have violated House rules.

RECOMMENDATION: The Board recommends that the Committee on Ethics further review the allegation concerning Representative Stockman's acceptance of campaign contributions from his congressional employees, as there is substantial reason to believe that Representative

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Stockman accepted contributions from individuals who were employed by his congressional office at the time the contributions were made, in violation of federal law and House Rules.

The Board recommends that the Committee on Ethics further review the allegation concerning Representative Stockman's submission of Payroll Authorization Forms, as there is substantial reason to believe that Representative Stockman made false statements and endeavored to impede the OCE inquiry when he filed those forms with the House Office of Payroll and Benefits in December 2013, purporting to document the termination of Mr. Posey and Mr. Dodd from his congressional staff on February 12, 2013, and their re-hiring on February 13, 2013, in violation of federal law and House rules.

The Board recommends that the Committee on Ethics further review the allegation concerning the reporting to the FEC of the contributions made by Representative Stockman's congressional employees, as there is substantial reason to believe that Representative Stockman failed to take reasonable steps to ensure that those contributions were properly reported on his campaign's FEC reports, in violation of federal law and House rules.

The Board recommends that the Committee on Ethics further review the allegation concerning the compensation of individuals employed in Representative Stockman's congressional office, as there is substantial reason to believe that Representative Stockman compensated the congressional office employees on a full-time basis during a period when they were only performing official duties on a part-time basis, in violation of House rules.

VOTES IN THE AFFIRMATIVE: 6

VOTES IN THE NEGATIVE: 0

ABSTENTIONS: 0

MEMBER OF THE BOARD OR STAFF DESIGNATED TO PRESENT THIS REPORT TO THE COMMITTEE ON ETHICS: Omar S. Ashmawy, Staff Director & Chief Counsel.

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OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 13-6070

On February 27, 2014, the Board of the Office of Congressional Ethics (hereafter “the Board”) adopted the following findings of fact and accompanying citations to laws, regulations, rules and standards of conduct (*in italics*).

The Board notes that these findings do not constitute a determination of whether or not a violation actually occurred.

I. INTRODUCTION

A. Summary of Allegations

1. In February 2013, Representative Steve Stockman accepted contributions to his congressional campaign committee, Friends of Congressman Steve Stockman, from two employees of his congressional office, Jason Posey and Thomas Dodd.
2. Representative Stockman filed Payroll Authorization Forms with the House Office of Payroll and Benefits in December 2013, purporting to document the termination of Mr. Posey and Mr. Dodd from his congressional staff on February 12, 2013, and their re-hiring on February 13, 2013. According to Representative Stockman, Mr. Posey and Mr. Dodd made the contributions to his campaign between the time they were terminated and subsequently rehired by the congressional office, a period of only several hours.
3. Representative Stockman’s congressional campaign committee subsequently filed Federal Election Commission (“FEC”) reports identifying the contributions made by Mr. Posey and Mr. Dodd as having been made by their family members.
4. From January to October 2013, Representative Stockman compensated Mr. Posey and Mr. Dodd on a full-time basis, including during a period when the two employees were performing official duties only on a part-time basis.
5. If Representative Stockman conspired to accept contributions to his congressional campaign committee from individuals who were employed by his congressional office, then he may have violated federal law and House rules.
6. If Representative Stockman made false statements and endeavored to impede the OCE inquiry when he filed Payroll Authorization Forms in December 2013, purporting to document the termination and rehiring of Mr. Posey and Mr. Dodd in February 2013, then he may have violated federal law and House rules.

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7. If Representative Stockman filed FEC reports falsely identifying the contributions made by his congressional employees as having been made by family members of the employees, then he may have violated federal law and House rules.
8. If Representative Stockman compensated the two employees in his congressional office in a manner that was not commensurate with the official duties they performed, then he may have violated House rules.
9. The Board finds that there is substantial reason to believe that Representative Stockman conspired to accept contributions to his congressional campaign from individuals who were prohibited from contributing to his campaign because they were employed by his congressional office at the time the contributions were made.
10. The Board finds that there is substantial reason to believe that Representative Stockman made false statements and endeavored to impede the OCE inquiry when he filed Payroll Authorization Forms with the House Office of Payroll and Benefits in December 2013, purporting to document the termination of Mr. Posey and Mr. Dodd from his congressional staff on February 12, 2013, and their re-hiring on February 13, 2013.
11. The Board finds that there is substantial reason to believe that Representative Stockman, having been aware of the illegal nature of the contributions made by Mr. Posey and Mr. Dodd to his congressional campaign, failed to take reasonable steps to ensure that those contributions were properly reported on his campaign's FEC reports. This failure resulted in the reporting of those contributions in the names of others, in violation of federal law and House rules.
12. The Board finds that there is substantial reason to believe that Representative Stockman compensated congressional employees on a full-time basis during a period when they were only performing official duties on a part-time basis.

B. Jurisdictional Statement

13. The allegations that were the subject of this review concern Representative Steve Stockman, a Member of the United States House of Representatives from the 36th District of Texas. The Resolution the United States House of Representatives adopted creating the Office of Congressional Ethics directs that, "[n]o review shall be undertaken... by the board of any alleged violation that occurred before the date of adoption of this resolution."¹ The House adopted this Resolution on March 11, 2008. Because the conduct under review occurred after March 11, 2008, review by the Board is in accordance with the Resolution.

C. Procedural History

14. The OCE received a written request for a preliminary review in this matter signed by at least two members of the Board on October 25, 2013. The preliminary review

¹ H. Res 895, 110th Cong. §1(e) (2008) (as amended).

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15. At least three members of the Board voted to initiate a second-phase review in this matter on November 22, 2013. The second-phase review commenced on November 25, 2013.³ The second-phase review was scheduled to end on January 8, 2014.
16. The Board voted to extend the second-phase review by an additional period of fourteen days on December 12, 2013. The additional period ended on January 22, 2014.
17. The Board voted to refer the matter to the Committee on Ethics and adopted these findings on February 27, 2014.
18. The report and its findings in this matter were transmitted to the Committee on Ethics on March 13, 2014.

D. Summary of Investigative Activity

19. The OCE requested documentary and, in some cases, testimonial information from the following sources:
 - (1) Representative Stockman's Chief of Staff;
 - (2) Representative Stockman's Senior Legislative Assistant;
 - (3) Representative Stockman's Military Legislative Assistant;
 - (4) Representative Stockman's District Director;
 - (5) Representative Stockman's Senior Community Representative;
 - (6) Representative Stockman's Veterans Representative;
 - (7) Representative Stockman's Senior Constituent Liaison;
 - (8) Representative Stockman's District Press Assistant;
 - (9) Representative Stockman's Constituent Services Representative #1;
 - (10) Representative Stockman's Constituent Services Representative #2;
 - (11) Representative Stockman's District Staff Assistant; and
 - (12) Treasurer and Assistant Treasurer, Stockman for Senate Committee.

² A preliminary review is "requested" in writing by members of the Board of the OCE. The request for a preliminary review is received by the OCE on a date certain. According to H. Res. 895 of the 110th Congress (hereafter "the Resolution"), the timeframe for conducting a preliminary review is 30 days from the date of receipt of the Board's request.

³ According to the Resolution, the Board must vote (as opposed to make a written authorization) on whether to conduct a second-phase review in a matter before the expiration of the 30-day preliminary review. If the Board votes for a second-phase, the second-phase commences the day after the preliminary review ends.

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20. The OCE sent two Requests for Information (“RFI”) to Representative Stockman during this review, but Representative Stockman provided only a partial response to one RFI. The OCE received an initial written response to the first RFI on November 21, 2013. The OCE received a second written response on January 8, 2014. Representative Stockman did not, however, respond to a Supplemental RFI. Representative Stockman did not agree to be interviewed as part of the OCE review. Representative Stockman did not provide an RFI Certification, as required under OCE Rule 4(A)(2), when responding to the OCE’s RFIs. He was therefore determined to be non-cooperative.
21. The OCE sent an RFI to Jason Posey, former Special Projects Director for Representative Stockman, on December 6, 2013, and again on December 20, 2013. The OCE received a written response from Mr. Posey on January 22, 2014. Mr. Posey did not respond to repeated requests for an interview, nor did he provide an RFI Certification, as required under OCE Rule 4(A)(2), when responding to the OCE’s RFI. He was therefore determined to be a non-cooperating witness.
22. The OCE requested testimonial, and in some cases, documentary information, but received no response, from the following sources. They were determined to be non-cooperating witnesses.
 - (1) Thomas Dodd, Former Special Assistant for Representative Stockman;
 - (2) Donny Ferguson, Former Communications Director for Representative Stockman;
 - (3) John Velleco, Legislative Director for Representative Stockman;
 - (4) Rabih Zeidan, Certified Public Account and volunteer for the Friends of Congressman Steve Stockman Committee;
 - (5) Jane Dodd, mother of Thomas Dodd;
 - (6) Donnie Posey, father of Jason Posey; and
 - (7) Jon Noltie, Treasurer, Friends of Congressman Steve Stockman.
23. The OCE requested documentary and testimonial information from Jack Daly, who was hired by Representative Stockman’s congressional office on October 28, 2013, to serve as a part-time, nonpermanent General Counsel/Local District Representative. The OCE was unable to obtain information from Mr. Daly prior to the conclusion of the OCE’s review.
24. The following individuals or entities did not provide an RFI Certification, as required under OCE Rule 4(A)(2), when responding to RFIs, and were therefore determined to be non-cooperating witnesses:
 - (1) Andre Joseph, Veterans Representative;
 - (2) Wayne Prouse, District Staff Assistant; and

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(3) David Covey, Constituent Services Representative.

II. REPRESENTATIVE STOCKMAN ACCEPTED CONTRIBUTIONS TO HIS CONGRESSIONAL CAMPAIGN COMMITTEE FROM EMPLOYEES OF HIS CONGRESSIONAL OFFICE

A. Applicable Laws, Rules, and Standards of Conduct

25. 18 U.S.C. § 603

“It shall be unlawful for an officer or employee of the United States . . . to make any contribution within the meaning of section 301(8) of the Federal Election Campaign Act of 1971 . . . to any Senator or Representative in, or Delegate or Resident Commissioner to, the Congress, if the person receiving such contribution is the employer or employing authority of the person making the contribution.”

26. 18 U.S.C. § 371

“If two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both.”

27. House Rules

House Rule 23, clause 1 states that “[a] Member . . . of the House shall conduct himself at all times in a manner that shall reflect creditably on the House.”

28. House Ethics Manual

“While FECA and other statutes on campaign activity are not rules of the House, Members and employees must also bear in mind that the House Rules require that they conduct themselves ‘at all times in a manner that shall reflect creditably on the House’ (House Rule 23, clause 1). In addition, the Code of Ethics for Government Service, which applies to House Members and staff, provides in ¶ 2 that government officials should ‘[u]phold the Constitution, laws and legal regulations of the United States and of all governments therein and never be a party to their evasion.’ Accordingly, in violating FECA or another provision of statutory law, a Member or employee may also violate these provisions of the House rules and standards of conduct.”⁴

“Moreover, under these rules, a Member or employee must take reasonable steps to ensure that any outside organization over which he or she exercises control – including the individual’s own authorized campaign committee or, for example, a ‘leadership PAC’ – operates in compliance with applicable law.”⁵

⁴ House Ethics Manual at 122 (2008).

⁵ *Id.*

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“A provision of the federal criminal code, 18 U.S.C. § 603, makes it unlawful for any federal officer or employee to make certain campaign contributions to ‘the employer or employing authority of the person making the contribution.’ Accordingly, an employee of a Member office is prohibited from making a ‘contribution’ as that term is used in the statute . . . to his or her employing Member”⁶

“The prohibition against an employee making such a contribution to the individual’s employing Member is absolute. A House employee may not make such a contribution even if the contribution was entirely unsolicited and the employee genuinely wishes to make the contribution.”⁷

B. Representative Stockman Accepted Contributions to His Congressional Campaign Committee from Two Employees of His Congressional Office

29. On January 3, 2013, Representative Steve Stockman hired Jason Posey to serve as Director of Special Projects and Thomas Dodd to serve as Special Assistant in his Washington, DC congressional office.⁸ Mr. Posey was hired at an annual salary of \$60,000, while Mr. Dodd was hired at an annual salary of \$50,000.⁹
30. Mr. Posey has been described in media reports as a “longtime associate” of Representative Stockman, having worked with Representative Stockman on previous occasions, including his earlier service as a Member of Congress.¹⁰
31. In its report to the Federal Election Commission (“FEC”) for the first quarter of 2013, Representative Stockman’s congressional campaign committee, Friends of Congressman Steve Stockman, reported receiving three contributions of \$2,500 each from Jane Dodd of Dover, Delaware, on February 21, 2013.¹¹ The contributions represented the maximum contribution from an individual for each of three elections – primary, general, and runoff – in which Representative Stockman was a candidate in 2012.¹²
32. In that same report, the Stockman campaign reported receiving three contributions of \$2,500 each from Donnie Posey of Fulton, Mississippi, on February 21, 2013, again for each of three elections in which Representative Stockman was a candidate in 2012.¹³
33. Jane Dodd is the mother of Thomas Dodd, and Donnie Posey is Jason Posey’s father.¹⁴

⁶ *Id.* at 137-38.

⁷ *Id.* at 138.

⁸ Payroll Authorization Form for Jason T. Posey, filed Jan. 15, 2013 (Exhibit 1 at 13-6070_0002); Payroll Authorization Form for Thomas R. Dodd, filed Jan. 15, 2013 (Exhibit 2 at 13-6070_0004).

⁹ *Id.*

¹⁰ Peter Olsen-Phillips, *Questions Surface over Stockman Campaign Contributions*, Sunlight Foundation Reporting Group, Oct. 10, 2013.

¹¹ Friends of Congressman Steve Stockman, First Quarter 2013 FEC Report of Receipts and Disbursements, filed April 15, 2013.

¹² *Id.*

¹³ *Id.*

¹⁴ Letter from Rep. Steve Stockman to OCE Staff Director and Chief Counsel, Jan. 2, 2014 (Exhibit 3 at 13-6070_0009).

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34. On October 10, 2013, a Sunlight Foundation report raised questions regarding the contributions made by Jane Dodd and Donnie Posey. The Foundation contacted Ms. Dodd about her contributions to the Stockman campaign, but Ms. Dodd explained to the Foundation that she had no recollection of making any contributions, telling the organization, “That wasn’t me.”¹⁵
35. When asked about the contributions purportedly made by his mother, Thomas Dodd told the Foundation that he could not comment because he “did not make the contribution.”¹⁶
36. The Sunlight Foundation also questioned whether the contributions purportedly made by Donnie Posey were connected to Jason Posey.¹⁷ The Foundation, however, was unable to speak with either Donnie or Jason Posey.¹⁸
37. On October 16, 2013, six days after the Sunlight Foundation report, Representative Stockman’s campaign committee amended its first-quarter 2013 FEC report to disclose that the contributions initially attributed to Jane Dodd and Donnie Posey had actually been made by Thomas Dodd and Jason Posey, respectively.¹⁹ The date of receipt of the contributions remained February 21, 2013.²⁰
38. A memo entry included in the amended FEC report explained:

The amended contributions were attributed to family members as a result of miscommunication with accounting about joint charitable donations and family/personal funds. In recording the transactions, contributions were erroneously recorded in the other family member’s name. Upon realizing this error, we made the necessary correction. This situation did not and does not involve any excessive contributions or the need to reattribute excess contributions to another person.²¹
39. Two days later, on October 18, 2013, the Sunlight Foundation reported that the amended FEC report raised the question whether Mr. Dodd and Mr. Posey may have violated the federal criminal prohibition on political contributions by federal employees to their employers, as Mr. Posey and Mr. Dodd apparently made the contributions to Representative Stockman’s congressional campaign at a time when they were employed in his congressional office.²²

¹⁵ Peter Olsen-Phillips, *Questions Surface over Stockman Campaign Contributions*, Sunlight Foundation Reporting Group, Oct. 10, 2013.

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ Friends of Congressman Steve Stockman, Amended First Quarter 2013 FEC Report of Receipts and Disbursements, filed Oct. 16, 2013.

²⁰ *Id.*

²¹ *Id.*

²² Peter Olsen-Phillips, *Stockman Campaign May Have Broken Campaign Finance Law*, Sunlight Foundation Reporting Group, Oct. 18, 2013.

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40. The day after the Sunlight Foundation report, October 19, 2013, the Stockman congressional campaign committee filed a second amended first-quarter 2013 report with the FEC, explaining that the contributions made by Mr. Dodd and Mr. Posey had been refunded.²³ A memo entry included in the second amended report added:

IT SHOULD BE NOTED, that all aforementioned contributions have been refunded in full as the corrections may have deemed them not permissible. Checks (#1133-1141) were issued in October when corrections were made, thus cannot be recorded on QTR1 report, but are already included on Year-End Report.²⁴

41. The second amended report indicates that the contributions were refunded to Mr. Dodd and Mr. Posey by checks dated October 18, 2013.²⁵
42. One month later, after the OCE notified Representative Stockman that it had initiated a review into this matter, on November 19, 2013, the Stockman congressional campaign committee filed a third amended FEC report.²⁶ This version changed the date of receipt for the contributions made by Mr. Dodd and Mr. Posey from February 21, 2013 to February 12, 2013.²⁷
43. The initial and the amended FEC reports were each signed by Mr. Posey, who was then serving as the Treasurer of the Stockman congressional campaign committee.²⁸

C. Responses from Representative Stockman and Jason Posey

44. Representative Stockman provided two submissions in response to the OCE's first RFI, concerning the contributions from Mr. Posey and Mr. Dodd.²⁹ The initial submission came in the form of an email from Representative Stockman's Legislative Director, and the second submission was a letter from Representative Stockman dated January 2, 2014. The OCE also sent RFIs to Mr. Posey and Mr. Dodd; the OCE received a written response from Mr. Posey on January 22, 2014, but received no response from Mr. Dodd.

²³ Friends of Congressman Steve Stockman, Second Amended First Quarter 2013 FEC Report of Receipts and Disbursement, filed Oct. 19, 2013.

²⁴ *Id.*

²⁵ *Id.*

²⁶ Friends of Congressman Steve Stockman, Third Amended First Quarter 2013 FEC Report of Receipts and Disbursements, filed Nov. 19, 2013.

²⁷ *Id.* On November 19, 2013, the initial amended report filed with the FEC listed the three contributions made by Mr. Posey as contributions from "Posey International." Later that same day, another amended report was filed listing the contributions as coming from Jason Posey, with "Posey International" listed as his employer.

²⁸ Friends of Congressman Steve Stockman, Amended First Quarter 2013 FEC Report of Receipts and Disbursements, filed April 15, 2013; Friends of Congressman Steve Stockman, Amended First Quarter 2013 FEC Report of Receipts and Disbursements, filed Oct. 16, 2013; Friends of Congressman Steve Stockman, Second Amended First Quarter 2013 FEC Report of Receipts and Disbursement, filed Oct. 19, 2013; Friends of Congressman Steve Stockman, Third Amended First Quarter 2013 FEC Report of Receipts and Disbursements, filed Nov. 19, 2013.

²⁹ Email from John Velleco to OCE Investigative Counsel, Nov. 21, 2013 (Exhibit 4 at 13-6070_0011); letter from Rep. Steve Stockman to OCE Staff Director and Chief Counsel, Jan. 2, 2014 (Exhibit 3 at 13-6070_0007-0009).

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45. Representative Stockman's initial response acknowledged the contributions made by Mr. Posey and Mr. Dodd and emphasized remedial measures that Representative Stockman had taken. His second response introduced additional facts that contradicted both his initial response to the OCE and statements made to the FEC, asserting that Mr. Posey and Mr. Dodd had not been employed by his congressional office at the time they made the contributions to Representative Stockman's campaign – rather, they made the contributions in the period between their resignation from congressional employment on February 12, 2013, and their re-appointment on February 13, 2013.

Representative Stockman's November 21, 2013 Response

46. On November 21, 2013, Representative Stockman's Legislative Director, John Velleco, provided the OCE with a response to the OCE's initial RFI.³⁰ In that response, Mr. Velleco stated that, "[s]ince receiving the RFI three weeks ago, Congressman Stockman has looked into this matter extensively to ensure a comprehensive response is provided, and he welcomes the opportunity to cooperate with the OCE inquiry into this matter."³¹
47. The response acknowledged that "[i]n February of 2013, two employees of Steve Stockman's congressional staff, Thomas Dodd and Jason Posey, each made three separate contributions to his campaign."³²
48. The response appears to argue that while Mr. Posey and Mr. Dodd were employed in Representative Stockman's congressional office at the time the contributions were made, the contributions were nevertheless appropriate because they "were intended for, and attributed to, three elections held in 2012 . . . which all occurred prior to Mr. Stockman becoming a federal elected office holder and, therefore, prior to Mr. Posey and Mr. Dodd working for Mr. Stockman's official office."³³
49. With respect to the question why the contributions made by Mr. Posey and Mr. Dodd were reported as having been made by their family members, the response explained that the contributions were reported in that way based on "the advice of a Certified Public Accountant who was also a volunteer for the campaign."³⁴
50. The volunteer CPA was identified as Rabih Zeidan, Ph.D., CPA, FHFMA, and an assistant professor of accounting at Texas A&M University – Corpus Christi.³⁵ According to the response, Dr. Zeidan believed that reporting the contributions in this manner was permissible, "erroneously relying on an FEC provision that allows a campaign to reattribute contributions to a spouse under certain conditions."³⁶
51. Dr. Zeidan refused to interview with the OCE.

³⁰ Email from John Velleco to OCE Investigative Counsel, Nov. 21, 2013 (Exhibit 4 at 13-6070_0011).

³¹ *Id.*

³² *Id.*

³³ *Id.*

³⁴ *Id.*

³⁵ Letter from Rep. Steve Stockman to OCE Staff Director and Chief Counsel, Jan. 2, 2014 (Exhibit 3 at 13-6070_0009). See also <http://faculty.tamucc.edu/rzeidan/>.

³⁶ Email from John Velleco to OCE Investigative Counsel, Nov. 21, 2013 (Exhibit 4 at 13-6070_0011).

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52. The response asserts that “[a]t no time was there an attempt to conceal the contributions from the FEC or the public. Furthermore, the contributions did not exceed federal election law limits, nor were they used for any non-permissible purposes.”³⁷
53. According to the response, when Representative Stockman discovered the “erroneous reporting” in October 2013, the contributions were “immediately returned.”³⁸
54. The response also outlines the steps taken by Representative Stockman after discovering the erroneous reporting of the contributions, noting that Mr. Posey and Mr. Dodd were “dismissed” from Representative Stockman’s congressional staff, and the process of replacing Mr. Posey as campaign treasurer was initiated.³⁹ Representative Stockman also required his entire congressional staff to retake House ethics training and established “new protocols” to review each contribution to his congressional campaign.⁴⁰

Representative Stockman’s January 8, 2014 Response

55. On January 8, 2014, the OCE received a second response from Representative Stockman; the response was dated January 2, 2014.⁴¹
56. According to the second response, Mr. Posey and Mr. Dodd did, in fact, make contributions to Representative Stockman’s congressional campaign, but “[a]t the time these contributions were made, neither Mr. Posey nor Mr. Dodd was then a duly appointed employee of [Representative Stockman’s] congressional office.”⁴²
57. Representative Stockman explained that, on February 11, 2013, Mr. Posey and Mr. Dodd each “wrote out (but did not immediately deliver) three personal checks to my campaign from their own funds in the amount of \$2,500 each Neither man consulted me in advance regarding these contributions, nor did I request them.”⁴³ Rather, “[t]hey did so in fulfillment of informal pledges they had made to each other before the general election in 2012.”⁴⁴
58. Representative Stockman provided the OCE with copies of the front of each of the checks written by Mr. Posey and Mr. Dodd; the information provided does not, however, indicate when the checks were deposited.⁴⁵ Further, neither Mr. Posey nor Mr. Dodd

³⁷ *Id.*

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ *Id.*

⁴¹ Letter from Rep. Steve Stockman to OCE Staff Director and Chief Counsel, Jan. 2, 2014 (Exhibit 3 at 13-6070_0007-0009).

⁴² *Id.* at 13-6070_0007.

⁴³ *Id.*

⁴⁴ *Id.*

⁴⁵ Checks from Jason Posey, # [REDACTED] (Exhibit 5 at 13-6070_0013-0015); Checks from Thomas R. Dodd, # [REDACTED] (Exhibit 6 at 13-6070_0017-0019).

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provided bank records identifying when the checks were deposited or the source of the funds contributed.⁴⁶

59. Representative Stockman further explained that, “[b]ecause of their understanding that it would be improper to effectuate campaign contributions by delivery while they were employees of my congressional office, both men approached me on 12 February 2013 and announced they were resigning from their federal appointments.”⁴⁷
60. According to Representative Stockman, Mr. Dodd physically delivered a resignation letter at the time of this meeting; this letter was provided to the OCE by Representative Stockman.⁴⁸ Representative Stockman said that Mr. Posey resigned orally.⁴⁹
61. The OCE did not identify any other person present for the February 12, 2013 exchange in which Mr. Posey and Mr. Dodd purportedly resigned from the congressional office. Each of the three participants in that exchange – Representative Stockman, Mr. Posey, and Mr. Dodd – refused to interview with the OCE.
62. John Velleco, Representative Stockman’s Legislative Director, is responsible for the administrative functions, including personnel matters, in Representative Stockman’s congressional office.⁵⁰ Mr. Velleco also refused to cooperate with the OCE review.
63. According to Representative Stockman, only after Mr. Posey and Mr. Dodd had resigned did they announce their intention to contribute to his campaign.⁵¹ He stated that, “[a]t some point thereafter on 12 February they made official their contributions to the campaign (through delivery and receipt) and those funds were put into the campaign’s banking account within ten days.”⁵² He does not identify the person to whom the contributions were delivered, nor where or how that delivery took place.
64. Representative Stockman went on to explain that while he had gladly accepted Mr. Posey’s and Mr. Dodd’s resignations and their campaign contributions, he quickly came to have second thoughts about the situation:

⁴⁶ At the time Mr. Posey made the \$7,500 in contributions to Representative Stockman’s campaign, he was earning an annual salary of \$60,000 from the congressional office. *See* Payroll Authorization Form for Jason T. Posey, filed Jan. 15, 2013 (Exhibit 1 at 13-6070_0002). At the time Mr. Dodd made his \$7,500 in contributions, he was earning an annual salary of \$50,600. *See* Payroll Authorization Form for Thomas R. Dodd, filed Feb. 15, 2013 (Exhibit 2 at 13-6070_0005).

⁴⁷ Letter from Rep. Steve Stockman to OCE Staff Director and Chief Counsel, Jan. 2, 2014 (Exhibit 3 at 13-6070_0007).

⁴⁸ *Id.*; letter from Thomas R. Dodd to Rep. Steve Stockman, Feb. 12, 2013 (Exhibit 7 at 13-6070_0021).

⁴⁹ Letter from Rep. Steve Stockman to OCE Staff Director and Chief Counsel, Jan. 2, 2014 (Exhibit 3 at 13-6070_0007).

⁵⁰ *See* Memorandum of Interview of Representative Stockman’s Chief of Staff, Jan. 22, 2014 (“Chief of Staff MOI”) (Exhibit 8 at 13-6070_0023); Memorandum of Interview of Representative Stockman’s District Director, Jan. 9, 2014 (“District Director MOI”) (Exhibit 9 at 13-6070_0030).

⁵¹ Letter from Rep. Steve Stockman to OCE Staff Director and Chief Counsel, Jan. 2, 2014 (Exhibit 3 at 13-6070_0007).

⁵² *Id.*

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At first blush I was pleased with their actions But as I began thinking about the situation later that day, 12 February, I became what I would describe as mildly annoyed that they had presumed to take these significant actions of resigning without consulting me first to determine whether I would welcome the resignations After thinking about the matter and sleeping on it, on 13 February I asked both men to meet with me personally. I thanked them for their contributions and dedication, but told both that it would be my preference that they agree to return to federal service in my congressional office. I pointed out that since both had made the contributions at a time when they were not employees, the contributions were completely lawful and within their constitutional rights. I further argued that their having made such contributions could not render them ineligible for subsequent federal service I asked both to return to employment in my office, and both agreed. I then appointed both men to their positions at their previous salaries.⁵³

65. No termination or reappointment forms reflecting the purported February 2013 termination and rehiring of Mr. Posey or Mr. Dodd were filed with the House Office of Payroll and Benefits at the time these events were to have occurred. Rather, Representative Stockman submitted termination and appointment Payroll Authorization Forms with the Office of Payroll and Benefits on December 13, 2013, after the OCE had begun its review and shortly before providing his second response to the OCE's RFI.⁵⁴
66. Representative Stockman asserted that no paperwork was filed at the time of the personnel actions because "House administrative employees discouraged my staff from submitting payroll authorization forms to the Office of Payroll and Benefits."⁵⁵
67. According to Representative Stockman, "[i]n sum, my office was essentially told, 'There's absolutely no point in bothering with all of this paperwork and red tape, because it ain't going to make any difference anyway; you're just making busy work for the House financial accounting folks.' In deference to this attitude, we simply acquiesced until the false appearances created by the incomplete administrative record compelled us to set the record straight."⁵⁶
68. Representative Stockman did not refund the contributions made by Mr. Posey or Mr. Dodd at the time he decided to re-hire them in his congressional office. Rather, he asserts that "there is no question that the resignations were effective as of 12 February 2013,

⁵³ *Id.* at 13-6070_0008.

⁵⁴ See Letters from Rep. Steve Stockman to Director of the Office of Payroll & Benefits, Dec. 5, 2013, with accompanying Payroll Authorization Forms, filed with the Office of Payroll & Benefits Dec. 13, 2013 (Exhibit 10 at 13-6070_0034-0039).

⁵⁵ Letter from Rep. Steve Stockman to OCE Staff Director and Chief Counsel, Jan. 2, 2014 (Exhibit 3 at 13-6070_0008).

⁵⁶ *Id.*

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before the campaign contributions were effectuated,” and therefore “the contributions were completely lawful and within their constitutional rights.”⁵⁷

69. As discussed more fully below, the contributions made by Mr. Posey and Mr. Dodd were initially reported to the FEC by Representative Stockman’s congressional campaign committee as contributions from Mr. Posey’s father and Mr. Dodd’s mother, with a date of receipt of February 21, 2013.⁵⁸
70. According to Representative Stockman, he learned of this erroneous reporting from news reports in October 2013.⁵⁹ Representative Stockman said that, at that point, he “caused an amended report to be filed with the FEC, identifying Posey and Dodd as the contributors of the subject funds, promptly separated both from federal service, and refunded their contributions.”⁶⁰
71. Representative Stockman’s decision to separate Mr. Posey and Mr. Dodd from federal service was made despite his assertion that the contributions were lawfully made at a time when Mr. Posey and Mr. Dodd were not employed in his congressional office.⁶¹ Representative Stockman explained:
- I respect both men and hold no grudges, but I felt then and feel now that to continue them as public servants might not foster public confidence in my congressional office These men, Posey and Dodd, are not unscrupulous, but could fairly be said to be culpably gullible, nor am I pleased that each permitted this to happen without making sure it had been approved by me.⁶²
72. Representative Stockman provided the OCE with copies of the front of the checks from his campaign committee used to refund the contributions made by Mr. Posey and Mr. Dodd.⁶³ The checks are each dated October 15, 2013.⁶⁴
73. Representative Stockman refused the OCE’s requests for an interview in this matter. The OCE was therefore unable to test the veracity of the assertions made in the written responses provided by his office.

⁵⁷ *Id.*

⁵⁸ Friends of Congressman Steve Stockman, First Quarter 2013 FEC Report of Receipts and Disbursements, filed April 15, 2013.

⁵⁹ Letter from Rep. Steve Stockman to OCE Staff Director and Chief Counsel, Jan. 2, 2014 (Exhibit 3 at 13-6070_0009).

⁶⁰ *Id.* According to the paperwork filed by Representative Stockman with the Office of Payroll & Benefits, the termination of Mr. Posey and Mr. Dodd was originally effective on September 30, 2013. However, on October 31, 2013, Representative Stockman filed additional paperwork asking that the effective date of the terminations be changed from September 30, 2013 to October 15, 2013. *See* Letters from Rep. Steve Stockman to Office of Payroll & Benefits, Oct. 31, 2013 (Exhibit 11 at 13-6070_0041-0046). No reason was given for the change in termination dates.

⁶¹ *See* Letter from Rep. Steve Stockman to OCE Staff Director and Chief Counsel, Jan. 2, 2014 (Exhibit 3 at 13-6070_0008).

⁶² *Id.* at 13-6070_0009.

⁶³ Checks from Friends of Steve Stockman, #1133-35, 1139-1141 (Exhibit 12 at 13-6070_0048-0053).

⁶⁴ *Id.*

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Response from Jason Posey

74. After the OCE made repeated attempts to contact Mr. Posey regarding this review, on January 22, 2014, the last day of the review period, the OCE received a written submission, dated January 6, 2014, from Mr. Posey.⁶⁵
75. In his submission, Mr. Posey explained how he and Mr. Dodd came to make contributions to Representative Stockman's congressional campaign: "In early February, Tom Dodd and I came to the conclusion that the campaign's funds were minimal and its debts substantial. We jointly determined it was an appropriate time for us to fulfill our pledge (of financial support for the Congressman's campaign) he and I made to each other in the fall of 2012."⁶⁶
76. According to Mr. Posey, after he and Mr. Dodd had reached this conclusion, "[we] resigned from our respective positions in the Congressman's personal office on February 12, [and] each of us made three donations in the amount of \$2,500."⁶⁷
77. Mr. Posey went on to explain that he and Mr. Dodd "ultimately returned to federal service not long after we made our contributions."⁶⁸ Mr. Posey did not specify the date on which he and Mr. Dodd returned to federal service, nor did he describe the circumstances surrounding this return to federal service. Mr. Posey did not provide any evidence, beyond his statement, to support his account of his resignation and re-hire in Representative Stockman's congressional office in February 2013.
78. Mr. Posey also addressed the date on which he and Mr. Dodd made their contributions to Representative Stockman's campaign.⁶⁹ According to Mr. Posey, the Stockman campaign's initial FEC report used the date on which the contributions were deposited into the campaign's bank account (February 21, 2013); the amended report reflected the date the checks were "delivered to and received by the campaign" (February 12, 2013).⁷⁰
79. Mr. Posey further explained that the amendment was necessary because, while "[u]sually the precise date on which a contribution is officially 'received' by a campaign is a matter of great informality and of negligible consequence," in this case, "the date the contribution officially [*sic*] might make a true legal difference."⁷¹

⁶⁵ Letter from Jason T. Posey to OCE Investigative Counsel, Jan. 6, 2014 (Exhibit 13 at 13-6070_0055-0057).

⁶⁶ *Id.* at 13-6070_0055.

⁶⁷ *Id.* During the first quarter of 2013, the Stockman campaign paid off \$1,500 in debt owed to Mr. Posey for compensation. See Friends of Congressman Steve Stockman Committee, First Quarter 2013 FEC Report of Receipts and Disbursements, filed April 15, 2013.

⁶⁸ Letter from Jason T. Posey to OCE Investigative Counsel, Jan. 6, 2014 (Exhibit 13 at 13-6070_XXXX).

⁶⁹ *Id.* at 13-6070_0056. As noted above, the campaign's FEC report initially indicated that the contributions were received by the campaign on February 21, 2013. See Friends of Congressman Steve Stockman, First Quarter 2013 FEC Report of Receipts and Disbursements, filed April 15, 2013. The Stockman campaign later amended the report to change the date of receipt of the contributions – from February 21, 2013 to February 12, 2013 – on November 19, 2013, after the OCE began its review. See Friends of Congressman Steve Stockman, Third Amended First Quarter 2013 FEC Report of Receipts and Disbursements, filed Nov. 19, 2013.

⁷⁰ Letter from Jason T. Posey to OCE Investigative Counsel, Jan. 6, 2014 (Exhibit 13 at 13-6070_0056).

⁷¹ *Id.*

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80. Both Mr. Posey and Mr. Dodd refused to interview with the OCE as part of this review. The OCE was therefore unable to test the veracity of Mr. Posey's account or to question Mr. Dodd about his contributions to Representative Stockman.

D. The Various Accounts of the Circumstances Surrounding the Contributions Made by Mr. Posey and Mr. Dodd Include Contradictory Information

81. The Board notes several factors that raise questions about Representative Stockman's version of events in this matter. First, when asked by the Sunlight Foundation, Mr. Dodd initially denied making the contributions to Representative Stockman's campaign.⁷²
82. Second, the memo entry included in Representative Stockman's amended FEC report reflecting the refunds of the Posey and Dodd contributions, filed in October 2013, acknowledges that "the corrections may have deemed them not permissible."⁷³ Mr. Posey, who signed the FEC report as treasurer, presumably would have known if the contributions were made at a time when he and Mr. Dodd were not employed by the congressional office and were therefore permissible.
83. Third, Representative Stockman's initial response to the OCE, while purporting to be a "comprehensive response," omitted key and contradictory facts that were subsequently included in his second response, including the fact that Mr. Posey and Mr. Dodd purportedly made their contributions to his campaign between the time they resigned from, and were then re-hired by, his congressional office.
84. Fourth, the version of events recounted in Representative Stockman's second response to the OCE relies on actions taken only after the OCE initiated its review, including the filing of Payroll Authorization Forms making a record of the February 2013 resignation and reappointment of Mr. Posey and Mr. Dodd, and an FEC report amendment changing the date of receipt of the Dodd and Posey contributions.
85. Given this information, as well as the lack of cooperation by key individuals with the OCE review, the Board finds Representative Stockman's account of the circumstances surrounding the contributions made by Mr. Posey and Mr. Dodd less than credible.
86. Based on the foregoing information, the Board finds that there is substantial reason to believe that Representative Stockman conspired to accept contributions to his ~~congressional campaign from individuals who were prohibited from contributing to his~~ campaign because they were employed by his congressional office at the time the contributions were made, in violation of federal law and House rules.

⁷² See Peter Olsen-Phillips, *Questions Surface over Stockman Campaign Contributions*, Sunlight Foundation Reporting Group, Oct. 10, 2013.

⁷³ Friends of Congressman Steve Stockman, Second Amended First Quarter 2013 FEC Report of Receipts and Disbursements, filed Oct. 19, 2013.

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III. REPRESENTATIVE STOCKMAN FILED PAYROLL AUTHORIZATION FORMS IN DECEMBER 2013, PURPORTING TO DOCUMENT THE TERMINATION AND RE-HIRING OF MR. POSEY AND MR. DODD IN FEBRUARY 2013

A. Applicable Laws, Rules, and Standards of Conduct

87. 18 U.S.C. § 1001

“[W]hoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact; (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry; shall be fined . . . imprisoned . . . or both.”

“With respect to any matter within the jurisdiction of the legislative branch, subsection (a) shall apply only to (1) administrative matters, including a claim for payment, a matter related to the procurement of property or services, personnel or employment practices, or support services”

88. 18 U.S.C. § 1505

“Whoever corruptly⁷⁴ . . . influences, obstructs, or impedes or endeavors to influence, obstruct, or impede the due and proper administration of the law under which any pending proceeding is being had before any department or agency of the United States, or the due and proper exercise of the power of inquiry under which any inquiry or investigation is being had by either House, or any committee of either House or any joint committee of the Congress . . . [s]hall be fined under this title, imprisoned . . . or both.”

89. House Rules

House Rule 23, clause 1 states that “[a] Member . . . of the House shall conduct himself at all times in a manner that shall reflect creditably on the House.”

B. Representative Stockman Filed Payroll Authorization Forms in December 2013, Purporting to Document the Termination of Mr. Posey and Mr. Dodd on February 12, 2013, and Their Re-Hiring on February 13, 2013

90. As noted above, Representative Stockman’s second response to the OCE’s Request for Information asserts that Mr. Posey and Mr. Dodd made their contributions to his congressional campaign between the time they resigned from the congressional office

⁷⁴ “Corruptly” is defined in the statute as “acting with an improper purpose, personally or by influencing another, including making a false or misleading statement, or withholding, concealing, altering, or destroying a document or other information.” 18 U.S.C. § 1515(b).

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sometime on February 12, 2013, and were subsequently re-hired by Representative Stockman the next day, February 13, 2013, a period of only several hours.⁷⁵

91. No termination or reappointment forms reflecting these personnel actions were filed with the House Office of Payroll and Benefits at the time Representative Stockman says they occurred. Representative Stockman explains that no record of the personnel actions was made because “House administrative employees discouraged my staff from submitting payroll authorization forms to the Office of Payroll and Benefits In deference to this attitude, we simply acquiesced until the false appearances created by the incomplete administrative record compelled us to set the record straight.”⁷⁶
92. Representative Stockman submitted termination and appointment Payroll Authorization Forms with the Office of Payroll and Benefits on December 13, 2013, purporting to document the termination and re-hiring of Mr. Posey and Mr. Dodd in February 2013, after the OCE had begun its review and shortly before providing his second response to the OCE’s RFI.⁷⁷
93. Given Representative Stockman’s lack of cooperation with this Review, his changing accounts of the circumstances surrounding the Posey and Dodd contributions, and the attempt to create a record of personnel actions only after questions were raised about the contributions, the Board does not find Representative Stockman’s assertion that Mr. Posey and Mr. Dodd were terminated and rehired in February 2013 to be credible.
94. Based on the foregoing information, the Board finds that there is substantial reason to believe that Representative Stockman made false statements and endeavored to impede the OCE inquiry when he filed Payroll Authorization Forms with the House Office of Payroll and Benefits in December 2013, purporting to document the termination of Mr. Posey and Mr. Dodd from his congressional staff on February 12, 2013, and their re-hiring on February 13, 2013.

IV. REPRESENTATIVE STOCKMAN’S CONGRESSIONAL CAMPAIGN COMMITTEE REPORTED THE CONTRIBUTIONS FROM EMPLOYEES OF HIS CONGRESSIONAL OFFICE TO THE FEDERAL ELECTION COMMISSION AS HAVING BEEN MADE IN THE NAMES OF OTHERS

A. Applicable Laws, Rules, and Standards of Conduct

95. Federal Election Campaign Act

“Each [Federal Election Commission] report . . . shall disclose . . . the identification of each person . . . who makes a contribution to the reporting committee during the

⁷⁵ Letter from Rep. Steve Stockman to OCE Staff Director and Chief Counsel, Jan. 2, 2014 (Exhibit 3 at 13-6070_0007-0008).

⁷⁶ *Id.* at 13-6070_0008.

⁷⁷ See Letters from Rep. Steve Stockman to Director of the Office of Payroll & Benefits, Dec. 5, 2013, with accompanying Payroll Authorization Forms, filed with the Office of Payroll & Benefits Dec. 13, 2013 (Exhibit 10 at 13-6070_0034-0039).

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*reporting period, whose contribution or contributions have an aggregate amount or value in excess of \$200 within the . . . election cycle . . . together with the date and amount of any such contributions.*⁷⁸

*“No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.”*⁷⁹

Federal Election Commission regulations further provide: “No person shall—

- (i) Make a contribution in the name of another;*
- (ii) Knowingly permit his or her name to be used to effect that contribution;*
- (iii) Knowingly help or assist any person in making a contribution in the name of another; or*
- (iv) Knowingly accept a contribution made by one person in the name of another.”*⁸⁰

96. House Rules

House Rule 23, clause 1 states that “[a] Member . . . of the House shall conduct himself at all times in a manner that shall reflect creditably on the House.”

97. House Ethics Manual

*“While FECA and other statutes on campaign activity are not rules of the House, Members and employees must also bear in mind that the House Rules require that they conduct themselves ‘at all times in a manner that shall reflect creditably on the House’ (House Rule 23, clause 1). In addition, the Code of Ethics for Government Service, which applies to House Members and staff, provides in ¶ 2 that government officials should ‘[u]phold the Constitution, laws and legal regulations of the United States and of all governments therein and never be a party to their evasion.’ Accordingly, in violating FECA or another provision of statutory law, a Member or employee may also violate these provisions of the House rules and standards of conduct.”*⁸¹

*“Moreover, under these rules, a Member or employee must take reasonable steps to ensure that any outside organization over which he or she exercises control – including the individual’s own authorized campaign committee or, for example, a ‘leadership PAC’ – operates in compliance with applicable law.”*⁸²

⁷⁸ 2 U.S.C. § 434(b)(3).

⁷⁹ 2 U.S.C. § 441f.

⁸⁰ 11. C.F.R. § 110.4(b)

⁸¹ House Ethics Manual at 122.

⁸² *Id.*

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B. Representative Stockman's Campaign Committee Reported the Contributions from His Congressional Employees to the Federal Election Commission As Having Been Made by the Employees' Family Members

98. As noted above, the \$15,000 in contributions to Representative Stockman's congressional campaign made by Mr. Posey and Mr. Dodd were initially reported to the FEC as contributions made by Mr. Posey's father and Mr. Dodd's mother.
99. Federal election law prohibits an individual from making a contribution in the name of another, and prohibits a candidate from accepting a contribution made in the name of another.⁸³
100. Representative Stockman says that the erroneous reporting was the result of "ignorance and poor judgment" on the part of his campaign volunteers.⁸⁴
101. According to Representative Stockman, Dr. Rabih Zeidan, a CPA voluntarily assisting the Stockman campaign with the preparation of its FEC reports, had "some miscomprehension" of FEC reattribution rules that led him to conclude that it was permissible to "reattribute" a contribution given by one person to an immediate family member of that person.⁸⁵
102. Representative Stockman told the OCE that Dr. Zeidan was apparently concerned that listing Mr. Posey and Mr. Dodd as contributors on the FEC report could lead Representative Stockman's critics to claim that he had used "some measure of intimidation or pressure to extract the funds" from Mr. Posey and Mr. Dodd.⁸⁶
103. Acting on his "miscomprehension" of FEC reattribution rules, Dr. Zeidan purportedly asked Mr. Posey and Mr. Dodd "to supply him with names of immediate family members to whom he might ascribe their contributions."⁸⁷ Mr. Posey and Mr. Dodd, relying on Dr. Zeidan's "insistence that this was a permissible reporting practice," gave him the names of their parents.⁸⁸

⁸³ 2 U.S.C. § 441f.

⁸⁴ Letter from Rep. Steve Stockman to OCE Staff Director and Chief Counsel, Jan. 2, 2014 (Exhibit 3 at 13-6070_0009).

⁸⁵ *Id.* While FEC regulations permit reattribution of contributions in certain instances, reattribution is available only in those situations in which a contribution is "made by more than one person in a single written instrument." 52 Fed. Reg. 760, 765 (Jan. 9, 1987). *See also* 11 C.F.R. § 110.1(k). FEC regulations do not permit reattribution to be used to substitute the name of one contributor for the name of another, as "a joint contribution must represent the personal funds of each contributor because contributions made in the name of another are prohibited." FEC Campaign Guide for Congressional Candidates and Committees at 25 (August 2011) (citation omitted). There is no indication, either from the face of the checks or from any material accompanying the checks, that the Posey and Dodd contributions were written from joint accounts or otherwise made or intended to be made from joint funds.

⁸⁶ Letter from Rep. Steve Stockman to OCE Staff Director and Chief Counsel, Jan. 2, 2014 (Exhibit 3 at 13-6070_0009).

⁸⁷ *Id.*

⁸⁸ *Id.*

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104. Dr. Zeidan then completed the FEC report, identifying the contributions made by Mr. Posey and Mr. Dodd as made by Mr. Posey's father and Mr. Dodd's mother.⁸⁹
105. In his submission to the OCE, Representative Stockman asserts: "At no time did I approve of this move, nor was I even aware of it until media reports surfaced months later Needless to say, had I been made aware of it, I would not have permitted the erroneous reattribution to be reported."⁹⁰
106. Representative Stockman, however, appears to acknowledge that the circumstances surrounding the contributions made by Mr. Posey and Mr. Dodd had the potential to raise questions in the minds of those who saw them disclosed in his campaign's FEC reports. He notes that, when he purportedly rehired Mr. Posey and Mr. Dodd in his congressional office, he had to "point[] out that since both had made the contributions at a time when they were not employees, the contributions were completely lawful and within their constitutional rights."⁹¹ Further, he "argued that their having made such contributions could not render them ineligible for subsequent federal service"⁹²
107. Mr. Posey's account of the reporting of the contributions also places blame for the erroneous reporting on Dr. Zeidan. According to Mr. Posey, weeks after he and Mr. Dodd made their contributions to Representative Stockman's congressional campaign, Mr. Posey "transcribed those six donations into a contribution spreadsheet that [he] sent to the campaign accountant – a volunteer named Dr. Rabih Zeidan – for him to put into the software he used to generate" the FEC report.⁹³
108. Mr. Posey said that Dr. Zeidan then "told Tom [Dodd] and me he thought our donations might look unseemly to some because we had ultimately returned to federal service not long after we made our contributions."⁹⁴
109. Mr. Posey explained that Dr. Zeidan, motivated by this concern, "advised us the FEC reattribution rule would authorize him to reattribute the contribution to a close family member rather than to us, the actual donors."⁹⁵ According to Mr. Posey, he and Mr. Dodd "just more or less did what he asked – which was to give him the name of a close family member so he could do a reattribution."⁹⁶
110. Mr. Posey said that he did not question Dr. Zeidan's advice because he "had been the treasurer for only a few weeks and did not consider [himself] an expert on the point."⁹⁷ Further, Mr. Posey stated that "Dr. Zeidan is a CPA and a PhD, and I knew he had been

⁸⁹ *Id.*

⁹⁰ *Id.*

⁹¹ *Id.* at 13-6070_0008.

⁹² *Id.*

⁹³ Letter from Jason T. Posey to OCE Investigative Counsel, Jan. 6, 2014 (Exhibit 13 at 13-6070_0055).

⁹⁴ *Id.*

⁹⁵ *Id.*

⁹⁶ *Id.* at 13-6070_0056.

⁹⁷ *Id.*

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doing some FEC reporting work off and on since the 1990s. Quite frankly I thought he knew what he was doing”⁹⁸

111. Mr. Posey told the OCE: “As far as I am aware, Congressman Stockman was never in the loop on any of this. I can say with certainty I do not recall any conversation or communications of any type I had with the Congressman about a potential reattribution at the time Dr. Zeidan was preparing the FEC report.”⁹⁹
112. Mr. Posey refused to interview with the OCE as part of this review. The OCE was therefore unable to test the veracity of Mr. Posey’s version of events.
113. Dr. Zeidan refused to cooperate with the OCE review, and the OCE was therefore unable to obtain his account of how the Posey and Dodd contributions came to be reported as contributions from family members.
114. According to Representative Stockman, when he learned of the erroneous reporting of the Posey and Dodd contributions, he terminated Mr. Posey and Mr. Dodd from his congressional office, despite his assertion that they had done nothing wrong. Representative Stockman did not make the OCE aware of any action taken with respect to Dr. Zeidan, the individual he blames for the erroneous reporting.
115. Based on the foregoing information, the Board finds that there is substantial reason to believe that Representative Stockman, having been aware of the illegal nature of the contributions made by Mr. Posey and Mr. Dodd to his congressional campaign, failed to take reasonable steps to ensure that those contributions were properly reported on his campaign’s FEC reports. This failure resulted in the reporting of those contributions in the names of others, in violation of federal law and House rules.

V. REPRESENTATIVE STOCKMAN MAY HAVE RETAINED MR. POSEY AND MR. DODD AS EMPLOYEES OF HIS CONGRESSIONAL OFFICE WHEN THEY DID NOT PERFORM OFFICIAL DUTIES COMMENSURATE WITH THEIR OFFICIAL COMPENSATION

A. Applicable Laws, Rules, and Standards of Conduct

116. 31 U.S.C. § 1301

“Appropriations shall be applied only to the objects for which the appropriations were made except as otherwise provided by law.”

117. House Rules

House Rule 23, clause 8 provides that a Member “may not retain an employee who does not perform duties for the offices of the employing authority commensurate with the compensation such employee receives.”

⁹⁸ *Id.*

⁹⁹ *Id.*

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118. House Ethics Manual

“The underlying standard for the receipt of compensation by an employee of the House is that the employee has regularly performed official duties commensurate with the compensation received. The Code of Ethics for Government Service instructs every employee to ‘[g]ive a full day’s labor for a full day’s pay; giving to the performance of his duties his earnest effort and best thought.’ Employees are paid United States Treasury funds to perform public duties. Appropriated funds are to be used solely for the purposes for which appropriated. Funds appropriated for congressional staff to perform official duties should be used only for assisting a Member in his or her legislative and representational duties, working on committee business, or performing other congressional functions. Employees may not be compensated from public funds to perform nonofficial, personal, or campaign activities on behalf of the Member, the employee, or anyone else.”¹⁰⁰

B. Representative Stockman May Have Provided Official Compensation to Mr. Posey and Mr. Dodd at a Time When Neither Individual Was Undertaking Officials Duties Commensurate with Their Official Compensation

119. During the course of the review, the OCE learned that, at some point during or shortly after the summer of 2013, Mr. Posey and Mr. Dodd left Representative Stockman’s Washington, DC congressional office to work in his congressional district in Texas.¹⁰¹
120. According to Representative Stockman’s District Director, after relocating to Texas, Mr. Posey and Mr. Dodd worked part-time on the congressional staff, based out of the Pasadena, Texas district office, and part-time for Representative Stockman’s campaign.¹⁰²
121. The District Director told the OCE that she believes that Mr. Posey and Mr. Dodd were to work in the Pasadena district office on Monday and Friday of each week.¹⁰³ Because the District Director only works in the Pasadena district office on Tuesdays, Wednesdays, and Thursdays, she did not typically have the opportunity to see whether Mr. Posey and Mr. Dodd were actually at work.¹⁰⁴
122. According to Representative Stockman’s Senior Community Representative, also based in the Pasadena district office, Mr. Posey came into the office to work once or twice each week.¹⁰⁵ She told the OCE that Mr. Dodd rarely came to work, recalling that he may have come to work in the Pasadena office “maybe once.”¹⁰⁶

¹⁰⁰ House Ethics Manual at 279.

¹⁰¹ District Director MOI (Exhibit 9 at 13-6070_0030); Chief of Staff MOI (Exhibit 8 at 13-6070_0024-0025); Memorandum of Interview of Representative Stockman’s Military Legislative Assistant, Jan. 27, 2014 (Exhibit 14 at 13-6070_0060-0061).

¹⁰² District Director MOI (Exhibit 9 at 13-6070_0030).

¹⁰³ *Id.*

¹⁰⁴ *Id.*

¹⁰⁵ Memorandum of Interview of Representative Stockman’s Senior Community Representative, Jan. 9, 2014 (Exhibit 15 at 13-6070_0065).

¹⁰⁶ *Id.*

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123. Payroll records reviewed by the OCE do not reflect any change to part-time status for Mr. Posey or Mr. Dodd during their tenure in Representative Stockman's congressional office, nor do those records reflect any change in compensation in or around the time that Mr. Posey and Mr. Dodd relocated to the district office.¹⁰⁷
124. As noted above, neither Mr. Posey nor Mr. Dodd agreed to be interviewed by the OCE. The OCE was therefore unable to question them regarding the work they performed for Representative Stockman's congressional office.
125. Based on the foregoing information, the Board finds that there is substantial reason to believe that Representative Stockman retained Mr. Posey and Mr. Dodd as congressional employees who did not perform official duties commensurate with their official compensation, in violation of House rules.

VI. INDIVIDUALS WHO REFUSED TO COOPERATE WITH THE OCE REVIEW

Representative Steve Stockman

126. The OCE requested information from Representative Stockman, including the opportunity to interview him, regarding the contributions made to his congressional campaign by two individuals employed by his congressional office.¹⁰⁸
127. Representative Stockman provided the OCE with two written responses to the OCE's initial RFI, but he did not provide all the information requested. Further, he declined to interview with the OCE, and he failed to certify his compliance with the RFI. He therefore did not cooperate with the OCE review.

Jason Posey

128. Mr. Posey served as Director of Special Projects in Representative Stockman's congressional office.
129. The OCE requested information from Mr. Posey, including the opportunity to interview him, regarding the contributions he made to Representative Stockman's congressional campaign in February 2013.
130. The OCE received a written response to its RFI from Mr. Posey on the last day of its review period. Mr. Posey did not, however, provide all the information requested by the OCE, he declined to interview with the OCE, and he failed to certify his compliance with the RFI. He therefore did not cooperate with the OCE review.

¹⁰⁷ See Jason T. Posey and Thomas R. Dodd Payroll Authorization Forms (Exhibit 1 at 13-6070_0002; Exhibit 2 at 13-6070_0004-0005); Exhibit 10 at 13-6070_0034-0039); Exhibit 11 at 13-6070_0041-0046).

¹⁰⁸ In a Supplemental Request for Information sent to Representative Stockman on January 3, 2014, the OCE sought information regarding Representative Stockman's earned income from Presidential Trust Marketing, disclosed in his 2012 Financial Disclosure Statement; Representative Stockman's involvement in the Ross Center; and matters involving H.R. 1144, the Alabama Coushatta Tribe of Texas Equal and Fair Opportunity Settlement Act. Representative Stockman did not respond to this Supplemental Request for Information.

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Thomas Dodd

131. Mr. Dodd served as Special Assistant in Representative Stockman's congressional office.
132. The OCE requested information from Mr. Dodd, including the opportunity to interview him, regarding the contributions he made to Representative Stockman's congressional campaign in February 2013.
133. Mr. Dodd refused to cooperate with the OCE review.

Donny Ferguson

134. Mr. Ferguson served as the Communications Director for Representative Stockman's congressional office.
135. The OCE requested information from Mr. Ferguson, including the opportunity to interview him, regarding contributions made by Mr. Posey and Mr. Dodd to Representative Stockman's congressional campaign in February 2013.
136. Mr. Ferguson refused to cooperate with the OCE review.

John Velleco

137. Mr. Velleco serves as the Legislative Director for Representative Stockman's congressional office.
138. The OCE requested information from Mr. Velleco, including the opportunity to interview him, regarding contributions made by Mr. Posey and Mr. Dodd to Representative Stockman's congressional campaign in February 2013.
139. Mr. Velleco refused to cooperate with the OCE review.

Rabih Zeidan

140. Dr. Zeidan is a Certified Public Accountant and volunteer for Representative Stockman's congressional campaign committee.
141. The OCE requested information from Dr. Zeidan, including the opportunity to interview him, regarding contributions made by Mr. Posey and Mr. Dodd to Representative Stockman's congressional campaign in February 2013.
142. Dr. Zeidan refused to cooperate with the OCE review.

Jane Dodd

143. Ms. Dodd is the mother of Thomas Dodd, former Special Assistant in Representative Stockman's congressional office.

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

144. The OCE requested information from Ms. Dodd, including the opportunity to interview her, regarding contributions made by Mr. Dodd to Representative Stockman's congressional campaign in February 2013, which were initially reported as contributions made by her.
145. Ms. Dodd refused to cooperate with the OCE review.

Donnie Posey

146. Mr. Donnie Posey is the father of Jason Posey, former Director of Special Projects in Representative Stockman's congressional office.
147. The OCE requested information from Mr. Donnie Posey, including the opportunity to interview him, regarding contributions made by Jason Posey to Representative Stockman's congressional campaign in February 2013, which were initially reported as contributions made by him.
148. Mr. Donnie Posey refused to cooperate with the OCE review.

Jon Noltie

149. Mr. Noltie is the Treasurer of Representative Stockman's congressional campaign committee and has served in this position since January 14, 2014.
150. The OCE requested information from Mr. Noltie regarding contributions made by Mr. Posey and Mr. Dodd to Representative Stockman's congressional campaign in February 2013.
151. Mr. Noltie refused to cooperate with the OCE review.

VII. CONCLUSION

152. Based on the foregoing information, the Board finds that there is substantial reason to believe that Representative Stockman conspired to accept contributions to his congressional campaign from individuals who were prohibited from contributing to his campaign because they were employed by his congressional office at the time the ~~contributions were made, in violation of federal law and House rules.~~
153. Based on the foregoing information, the Board finds that there is substantial reason to believe that Representative Stockman made false statements and endeavored to impede the OCE inquiry when he filed Payroll Authorization Forms with the House Office of Payroll and Benefits in December 2013, purporting to document the termination of Mr. Posey and Mr. Dodd from his congressional staff on February 12, 2013, and their re-hiring on February 13, 2013.
154. Based on the foregoing information, the Board finds that there is substantial reason to believe that Representative Stockman, having been aware of the illegal nature of the contributions made by Mr. Posey and Mr. Dodd to his congressional campaign, failed

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

to take reasonable steps to ensure that those contributions were properly reported on his campaign's FEC reports. This failure resulted in the reporting of those contributions in the names of others, in violation of federal law and House rules.

155. Based on the foregoing information, the Board finds that there is substantial reason to believe that Representative Stockman retained Mr. Posey and Mr. Dodd as congressional employees who did not perform official duties commensurate with their official compensation, in violation of House rules.

VIII. INFORMATION THE OCE WAS UNABLE TO OBTAIN AND RECOMMENDATIONS FOR THE ISSUANCE OF SUBPOENAS

156. The following witnesses, by declining to provide documentary or testimonial evidence to the OCE, did not cooperate with the OCE's review:

- (1) Representative Stockman;
- (2) Jason Posey;
- (3) Thomas Dodd;
- (4) Donny Ferguson;
- (5) John Velleco;
- (6) Rabih Zeidan;
- (7) Jane Dodd;
- (8) Donnie Posey; and
- (9) Jon Noltie.

157. The Board recommends the issuance of subpoenas to Representative Stockman, Jason Posey, Thomas Dodd, Donny Ferguson, John Velleco, Rabih Zeidan, Jane Dodd, Donnie Posey, and Jon Noltie.

EXHIBIT 1

PAYROLL AUTHORIZATION FORM

U.S. HOUSE OF REPRESENTATIVES
Washington, DC 20515

New Hire
Employee Typewriter
or Ballpoint Pen

06
3

To the Chief Administrative Officer of the House of Representatives: I hereby authorize the following payroll action:

Employee Name (First-Middle-Last)	Effective Date
Jason T. Posey	01/03/2013
Employee Social Security Number	Type of Action
[REDACTED]	<input checked="" type="checkbox"/> Appointment <input type="checkbox"/> Salary Adjustment <input type="checkbox"/> Title Change <input type="checkbox"/> Termination (At close of business on effective date) <input type="checkbox"/> Leave without pay (Beginning with effective date above and ending close of business _____) <small>(Specify date)</small>
Employing Office or Committee/Subcommittee	
Representative Steve Stockman	

(If type of action is an Appointment, Salary Adjustment or Title Change, complete appropriate information below.)

Position Title*	Gross Annual Salary**
Director of Special Projects	\$60,000

*Nonpermanent employees should be designated as Part-Time Employees, Paid Interns, Temporary Employees, or Shared Employees and will automatically receive the respective designation as their position title.

**If employee is a civil service annuitant (includes U.S. House of Representatives), the gross annual salary shown should include the annuity received by the employee plus the salary received from the employing office.

(If Clerk Hire Employees, complete appropriate item(s) below.)

- Permanent
- Nonpermanent (must specify one of the following categories) †Denotes not eligible for Benefits
 - Part-Time Employee
 - †Paid Intern
 - †Temporary Employee
 - LWOP Employee
 - Shared Employee

(Specify one other employing authority)

NOTE: Any erasures, corrections or changes on this form must be initialed by the authorizing official.

(If Employee of an Officer of the House, complete item below.)

Position Number..... If applicable, Level Step
If position transfer, previous position number..... Level Step

All appointments and salary adjustments for employees under the House Classification Act must be approved by the Committee on House Administration.

Date 01/11/2013

Steve Stockman
(Signature of Authorizing Official)

Steve Stockman
(Type or print name of Authorizing Official)

U.S. Representative, Texas-36

(Title--If Member, District and State)

.....
(Signature of Subcommittee Chairperson or Ranking Minority Member)

.....
(Type or print name and title of above official)

Appropriation Code:	Office of Payroll & Benefits use only
(Monthly Annuity \$.....00)	Benefits.....
as of	Payroll.....

ORIGINAL-TO OFFICE OF PAYROLL & BENEFITS (FOR OFFICIAL PERSONNEL FOLDER)

RECEIVED
2013 JAN 15 AM 7:47
PAYROLL & BENEFITS

EXHIBIT 2

Now Hire

Please use Typewriter
or Ballpoint Pen

Federal Svc

To the Chief Administrative Officer of the House of Representatives: I hereby authorize the following payroll action:

Employee Name (First-Middle-Last)	Effective Date
Thomas R. Dodd	01/03/2013
Employee Social Security Number	Type of Action
[REDACTED]	<input checked="" type="checkbox"/> Appointment <input type="checkbox"/> Salary Adjustment <input type="checkbox"/> Title Change <input type="checkbox"/> Termination (At close of business on effective date) <input type="checkbox"/> Leave without pay (Beginning with effective date above and ending close of business _____) (Specify date)
Employing Office or Committee/Subcommittee	
Representative Steve Stockman	

(If type of action is an Appointment, Salary Adjustment or Title Change, complete appropriate information below.)

Position Title*	Gross Annual Salary**
Special Assistant	\$50,000

*Nonpermanent employees should be designated as Part-Time Employees, Paid Interns, Temporary Employees, or Shared Employees and will automatically receive the respective designation as their position title.

**If employee is a civil service annuitant (includes U.S. House of Representatives), the gross annual salary shown should include the annuity received by the employee plus the salary received from the employing office.

(If Clerk Hire Employee, complete appropriate item(s) below.)

- Permanent
- Nonpermanent (must specify one of the following categories) †Denotes not eligible for Benefits
 - Part-Time Employee
 - †Paid Intern
 - †Temporary Employee
 - LWOP Employee
 - Shared Employee

(Specify one other employing authority)

NOTE: Any erasures, corrections or changes on this form must be initialed by the authorizing official.

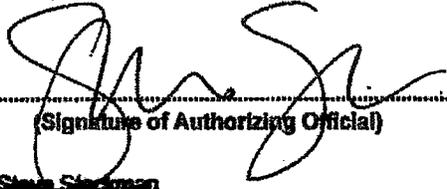
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2013 JAN 15 AM 7:48
PAYROLL & BENEFITS

(If Employee of an Officer of the House, complete item below.)

Position Number..... If applicable, Level Step
If position transfer, previous position number..... Level Step

All appointments and salary adjustments for employees under the House Classification Act must be approved by the Committee on House Administration.

Date 01/03/2013


(Signature of Authorizing Official)

Steve Stockman

.....
(Signature of Subcommittee Chairperson or Ranking Minority Member)

.....
(Type or print name of Authorizing Official)

U.S. Representative, Texas-36

.....
(Type or print name and title of above official)

.....
(Title--if Member, District and State)

Appropriation Code:	Office of Payroll & Benefits use only
(Monthly Annuity \$.....00)	Benefits.....
as of	Payroll.....

ORIGINAL-TO OFFICE OF PAYROLL & BENEFITS (FOR OFFICIAL PERSONNEL FOLDER)

To the Chief Administrative Officer of the House of Representatives: I hereby authorize the following payroll action:

Employee Name (First-Middle-Last)	Effective Date
Thomas R. Dodd	02-01-13
Employee Social Security Number	Type of Action
[REDACTED]	<input type="checkbox"/> Appointment <input checked="" type="checkbox"/> Salary Adjustment <input type="checkbox"/> Title Change <input type="checkbox"/> Termination (At close of business on effective date) <input type="checkbox"/> Leave without pay (Beginning with effective date above and ending close of business _____) (Specify date)
Employing Office or Committee/Subcommittee	
Representative Steve Stockman	
(If type of action is an Appointment, Salary Adjustment or Title Change, complete appropriate information below.)	
Position Title*	Gross Annual Salary**
Special Assistant	\$50,600

*Nonpermanent employees should be designated as Part-Time Employees, Paid Interns, Temporary Employees, or Shared Employees and will automatically receive the respective designation as their position title.

**If employee is a civil service annuitant (includes U.S. House of Representatives), the gross annual salary shown should include the annuity received by the employee plus the salary received from the employing office.

(If Clerk Hire Employee, complete appropriate item(s) below.)

- Permanent
- Nonpermanent (must specify one of the following categories) †Denotes not eligible for Benefits
 - Part-Time Employee
 - †Paid Intern
 - †Temporary Employee
 - LWOP Employee.
 - Shared Employee

(Specify one other employing authority)

NOTE: Any erasures, corrections or changes on this form must be initialed by the authorizing official.

RECEIVED
013 FEB 15 PM 1:03
PAYROLL & BENEFITS

(If Employee of an Officer of the House, complete item below.)

Position Number..... If applicable, Level Step
If position transfer, previous position number.....Level Step

All appointments and salary adjustments for employees under the House Classification Act must be approved by the Committee on House Administration.

Date 02/14/2013

(Signature of Authorizing Official)

Steve Stockman

(Type or print name of Authorizing Official)

(Signature of Subcommittee Chairperson
or Ranking Minority Member)

(Type or print name and title of above official)

U.S. Representative, Texas-36

(Title--If Member, District and State)

Appropriation Code:	Office of Payroll & Benefits use only	
	(Monthly Annuity \$.....00)	Benefits.....
	as of	Payroll.....

ORIGINAL-TO OFFICE OF PAYROLL & BENEFITS (FOR OFFICIAL PERSONNEL FOLDER)

EXHIBIT 3

Congress of the United States
House of Representatives
Washington, DC 20515-4336

2 January 2014

Mr. Omar S. Ashmawy
Staff Director & Chief Counsel
Office of Congressional Ethics (OCE)
425 3rd Street, SW
Washington, DC 20024

Dear Mr. Ashmawy:

I regret that myriad demands on my time (e.g., I am a U.S. Senate candidate in a 4 March 2014 primary election) did not allow me to complete this response before the Christmas recess. According to the statement of the nature of Review No. 13-6070 delivered on 30 October 2013, your office inquires whether former House employees Jason Posey and Thomas Dodd (1) made contributions to my campaign while employed by my congressional staff and (2) whether they used third parties as conduits through which to pass contributions to my campaign. I have now reviewed this matter and confirmed that the answer to both questions is NO.

With respect to the first question, both Mr. Posey and Mr. Dodd did in fact make contributions to my campaign. They did so in fulfillment of informal pledges they had made to each other before the general election in 2012. On 11 February 2013 they each wrote out (but did not immediately deliver) three personal checks to my campaign from their own funds in the amount of \$2,500 each, totaling \$7,500. Neither man consulted me in advance regarding these contributions, nor did I request them. I am including copies of those checks for use by you in your inquiry.

Because of their understanding that it would be improper to effectuate campaign contributions by delivery while they were employees of my congressional office, both men approached me on 12 February 2013 and announced that they were resigning from their federal appointments. In the case of Mr. Dodd, the resignation was quite formal and in writing, which he physically delivered to me on 12 February. I am including a copy of that document for your use in this inquiry. In the case of Mr. Posey, the resignation was oral, but delivered in that same moment.

Both gentlemen then announced to me with some measure of pride that they intended to make contributions to my campaign. I understand that at some time thereafter on 12 February they made official their contributions to the campaign (through delivery and receipt) and those funds were put into the campaign's banking account within ten days. At the time these contributions were made, neither Mr. Posey nor Mr. Dodd was then a duly appointed employee of my congressional office (or any branch or agency of the federal government for that matter). Attorneys with expertise in federal public employment law tell me that no measure of "acceptance" or paperwork is required or necessary to effectuate a resignation from an appointment in the civil service because it becomes effective the moment it is delivered, whether orally or in writing, to the appointing authority.

OFFICE: 11/03/14 11:05:52

At first blush I was pleased with their actions, as it reflected a level of dedication one does not often see in political supporters. I assumed that they presumed I would assist them in locating other employment, or find a spot for them as employees of my campaign. I certainly felt favorably disposed to both of them and would likely have assisted them in finding such other employment. But as I began thinking about the situation later that day, 12 February, I became what I would describe as mildly annoyed that they had presumed to take these significant actions of resigning without consulting me first to determine whether I would welcome the resignations.

Upon reflection, however, I came to the understanding that their decision not to consult me in advance was designed to protect me from any subsequent insinuation by political enemies that I had procured or otherwise brought about the contributions from them to my campaign by means of pressure or intimidation. Indeed, it would be hard for me to pressure employees for donations that even I did not know were coming. Moreover, had I shared their apparent perception that my campaign was not raising enough money, I would simply have made fundraising for my own campaign a higher priority (last winter and spring) than raising \$55,000 for the NRCC.

After thinking about the matter and sleeping on it, on 13 February I asked both men to meet with me personally. I thanked them for their contributions and their dedication, but told both that it would be my preference that they agree to return to federal service in my congressional office. I pointed out that since both had made the contributions at a time when they were not employees, the contributions were completely lawful and within their constitutional rights. I further argued that their having made such contributions could not render them ineligible for subsequent federal service – a conclusion I regard as unassailable. I asked both to return to employment in my office, and both agreed. I then appointed both men to their positions at their previous salaries.

The ministerial recordation of their resignations and re-appointments was not reflected in the files of the Chief Administrative Officer until December because House administrative employees discouraged my staff from submitting payroll authorization forms to the Office of Payroll & Benefits. The HR people noted that the end result of processing all of that personnel paperwork would be a net zero because a salaried House employee who works any portion of any day is paid for the entire day. Thus, notwithstanding their resignations, both Posey and Dodd were entitled to full pay for the entire month of February. In order to have lost any entitlement to pay, it would have been necessary for them to have been out the remainder of the 12th following their resignations, the entire day on the 13th, and to have delayed their reentry onto duty until the 14th. This is how it was explained to me.

In sum, my office was essentially told, "There's absolutely no point in bothering with all of this paperwork and red tape, because it ain't gonna make any difference anyway; you're just making busy-work for the House financial-accounting folks." In deference to this attitude, we simply acquiesced until the false appearances created by the incomplete administrative record compelled us to set the record straight. I am including copies of the personnel paperwork for use by you in your inquiry. Again, lawyers tell me that under federal civil service laws the lawfulness of resignations is determined by when they actually occurred, not by whether or when they are subsequently recorded. Thus, there is no question that the resignations were effective as of 12 February 2013, before the campaign contributions were effectuated.

With respect to the second question, neither Mr. Posey nor Mr. Dodd passed money on to third persons for the purpose of having such third parties make contributions, nor were any such "conduit" contributions ever made. Each man wrote the subject checks in his own name, on his

own account, from his own funds. Unfortunately, I have discovered that a combination of ignorance and poor judgment on the part of one or more campaign volunteers has resulted in contrary public perception and misleading news media reports, and I will try to explain to the best of my knowledge how that occurred.

A volunteer for my campaign, Rabih Zeidan, Ph.D., C.P.A., played no role in taking the subject contributions, but became aware of them as he began to assist in the preparation of the quarterly FEC report some weeks later. The accountant expressed his opinion to Posey and Dodd that the disclosure of their names on the report might encourage persons who do not share my political philosophy to imply that I had used some measure of intimidation or pressure to extract the funds from them. In short, he felt the names of staffers would give political enemies the motivation to cast aspersions about me, and he – quite on his own – set about devising a means by which to avoid giving them this encouragement.

Through some miscomprehension of the FEC's "retribution rule" that he has yet to explain to my satisfaction, the accountant concluded that it was appropriate and lawful for him to report to the FEC that contributions given by person A were actually given by person B, so long as the two were immediate family members. I should note that English is a second language for Dr. Zeidan, and this circumstance has been something of an impediment to my understanding his reasoning. Nevertheless, completely convinced that this action was permissible under the FEC retribution rule, the accountant asked Posey and Dodd to supply him with names of immediate family members to whom he might ascribe their contributions, and in reliance on his insistence that this was a permissible reporting practice, they complied. Posey supplied the name of his father and Dodd supplied the name of his mother. The accountant then filled out the relevant FEC quarterly report reattributing Posey's contributions to his father, and Dodd's to his mother.

At no time did I approve of this move, nor was I even aware of it until media reports surfaced months later calling attention to apparent contributions from the parents of two of my employees. Needless to say, had I been made aware of it, I would not have permitted the erroneous retribution to be reported. Indeed, as soon as I discovered it, I caused an amended report to be filed with the FEC, correctly identifying Posey and Dodd as the contributors of the subject funds, promptly separated both from federal service, and refunded their contributions. I am including a copy of those checks for use in your review. I respect both men and hold no grudges, but I felt then and feel now that to continue them as public servants might not foster public confidence in my congressional office. These men, Posey and Dodd, are not unscrupulous, but could fairly be said to be culpably gullible, nor am I pleased that each permitted this to happen without making sure it had been approved by me.

I am disappointed that the procedures I had in place at that time failed to detect and correct this reporting error before a quarterly report was filed with the FEC, and have put further safeguards and protocols in place to ensure such a snafu occurs never again. Namely, I retained the professional services of an attorney who specializes in FEC compliance and directed my campaign staff to undertake and complete additional FEC training. Please allow me to thank you for your office's role in setting the record straight concerning this matter.

Sincerely,

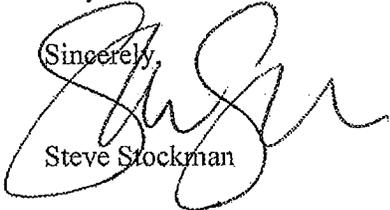

Steve Stockman

EXHIBIT 4

From: Velleco, John
Sent: Thursday, November 21, 2013 4:29 PM
To: Solis, Paul
Subject: RE: contact info

With apologies for the tardiness of this reply, the following is submitted in response to the Request For Information dated October 30, 2013:

In February of 2013, two employees of Steve Stockman's congressional staff, Thomas Dodd and Jason Posey, each made three separate contributions to his campaign.

The contributions were intended for, and attributed to, three elections held in 2012 (primary, runoff, and general elections), which all occurred prior to Mr. Stockman becoming a federal elected office holder and, therefore, prior to Mr. Posey and Mr. Dodd working for Mr. Stockman's official office.

The campaign treasurer, Jason Posey, was brand new to the position, having been appointed less than two weeks prior to the date of the contributions referenced in the RFI.

Acting on the advice of a Certified Public Accountant who was also a volunteer for the campaign, the contributions in question were reattributed to family members of the two actual donors. The accountant believed this designation to be legal, erroneously relying on an FEC provision that allows a campaign to reattribute contributions to a spouse under certain conditions.

At no time was there an attempt to conceal the contributions from the FEC or the public. Furthermore, the contributions did not exceed federal election law limits, nor were they used for any non-permissible purposes.

When the erroneous reporting was discovered in October of 2013, the contributions were immediately returned, and the two employees were subsequently dismissed from Mr. Stockman's congressional staff. The campaign treasurer will soon be replaced with a suitable successor.

In addition, Mr. Stockman's entire congressional staff has been required to retake the mandatory ethics training provided by the U.S. House of Representatives. Also, new protocols have been established to scrutinize each contribution received by the campaign, including review by an attorney before filing reports.

Since receiving the RFI three weeks ago, Congressman Stockman has looked into this matter extensively to ensure a comprehensive response is provided, and he welcomes the opportunity to cooperate with the OCE inquiry into this matter.

John Velleco

Administrative Assistant/Legislative Director
U.S. Representative Steve Stockman (TX-36)

202-225-██████

<http://www.Stockman.House.gov/>

<http://www.Facebook.com/CongressmanStockman>

www.Twitter.com/SteveWorks4You

[Sign up for Rep. Stockman's email newsletter](#)



EXHIBIT 5



Jason Pusey

[Redacted]

Friendwood P.O. 77546

Date 2-11-2013

98-1/510 VA
1668

Pay to the Order of Friends of Congressman Steve Stockman \$ 2,500
two thousand five hundred dollars *pp*

Security features:
All checks
Feature on file



[Signature]

ACH F/I 051000017

For Primary Donor

[Redacted]





88-1/510 VA
1858

Date 2-11-2013

Jason Posey



Friendwood Pk 77566



Pay to the Order of Friends of Congressman Steve Stock \$ 2,500

two thousand five hundred and 00/100 Dollars

Pay to the order of the payee



[Handwritten Signature]

ACH EFT 051000017

For Ray off



MP



Edward P. [redacted]

Friendwood Rd 77566

Date 2-11-2013

68-17510 VA 1888

Pay to the Order of Friends of Congressman Steve Stocker \$ 2,500
two thousand five hundred 00/100 Dollars



ACH R/T 051000017

For General [redacted]

[Signature]

EXHIBIT 6

WELLS FARGO BANK

CAPITOL HILL 215 PENNSYLVANIA AVE SE WASHINGTON, DC 20003

60-540514

DATE 2-1-13

PAY TO THE ORDER OF Friend of Science Stream \$ 2,500.00 DOLLARS
two thousand and no/100

THOMAS DODD

ARLINGTON VA 22210-4331



John P. ...



WELLS FARGO BANK

CAPITOL HILL 210 PENNSYLVANIA AVE SE WASHINGTON, DC 20003

DATE: 2/1/83

68-647514

PAY TO THE ORDER OF

Franco M. Stewart / Stewart

\$ 2500

DOLLARS

has been cashed by Stewart at 10/10

THOMAS DODD

ARLINGTON VA 22210-4331

[Signature]

[Signature]

WELLS FARGO BANK

CAPITOL HILL, 215 PENNSYLVANIA AVE SE WASHINGTON, DC 20003

68-341514

PAY TO THE ORDER OF

Friends of Steve Jackson

DATE

July 13

\$ *2,500*

DOLLARS

two thousand and five hundred and no/100

THOMAS DODD

ARLINGTON VA 2221D-4831



2012 general



EXHIBIT 7

February 12, 2013

Congressman Steve Stockman
United States House of Representatives
Washington, DC 20015

Dear Congressman Stockman,

I would like to inform you that I am resigning from my position as Special Assistant effective today February 12, 2013.

Thank you for the opportunities for professional and personal development that you have provided me. I have enjoyed working for you and appreciate the support provided me during my tenure on your staff.

If I can be of any help during this transition, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas R. Dodd', with a stylized flourish at the end.

Thomas R. Dodd

EXHIBIT 8

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Subject to the Nondisclosure Provisions of H. Res. 895 as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE: Representative Stockman's Chief of Staff
REVIEW No(s): 13-6070
DATE: January 22, 2014
LOCATION: Office of Congressional Ethics
TIME: 11:07 AM to 11:52 AM (approximate)
PARTICIPANTS: Scott Gast
Bryson Morgan
William Canfield, attorney for the witness

SUMMARY: The OCE requested an interview with the witness and he consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. The witness signed a written acknowledgement of the warning.
2. The witness is Chief of Staff to Representative Stockman, and has held that position since January 3, 2013. Prior to becoming Chief of Staff, the witness was a lobbyist with The Westerly Group and a political consultant with National Political Associates, through which he became acquainted with Representative Stockman and involved in his campaign.
3. The witness stated that his duties as Chief of Staff include managing a portfolio of legislative issues for Representative Stockman that includes ways and means, energy and commerce, small business, natural resources, and other matters. The witness also meets with constituents on such matters. The witness stated that he does not have administrative responsibilities in the office and that such responsibilities are primarily fulfilled by John Velleco.
4. The witness stated that Mr. Velleco primarily handles personnel issues such as hiring and firing paperwork, and that managing the office is a team effort between Mr. Velleco, Representative Stockman, and the witness because the office does not have a strict organizational chart.
5. The witness stated that when the United States House of Representatives is in session he meets with Representative Stockman regularly. The witness stated that he has not visited Representative Stockman's congressional district and that he only interacts with district staff on issues within his portfolio.
6. The witness stated that he actively participated in Representative Stockman's 2012 congressional campaign as a paid consultant. He did not hold a formal position with the campaign in 2012, and has no involvement in Representative Stockman's campaign for the United States Senate.

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7. The witness is not sure who were the paid staff of Representative Stockman's congressional campaign in 2012, and when he participated in the campaign he worked directly with Representative Stockman and no other individuals.
8. The witness stated he first met Representative Stockman when a group of conservatives invited him to meet Stockman during the fall of 2011 when Texas' congressional districts were being redrawn and Stockman was considering running for Congress.
9. The witness stated that he was not involved in Representative Stockman's 1994 congressional campaign.
10. The witness stated that he met Jason Posey for the first time right after the election or perhaps at an election night party. The witness is not sure whether Mr. Posey was a paid campaign staffer or was volunteering for Representative Stockman's campaign.
11. The witness was not responsible for hiring Mr. Posey to work in Representative Stockman's congressional office. Rather, Representative Stockman told the witness that Mr. Posey would be on the staff. This occurred at a meeting the witness had with Representative Stockman to go over staffing the congressional office that was attended by Representative Stockman, the witness, Mr. Posey, Mr. Velleco, Thomas Dodd, Bonnie Norman, Brad Lewis, the Covey brothers, and perhaps others.
12. The witness stated that Mr. Posey's role in Representative Stockman's congressional office was to work on "special projects," such as constituent work, flags, and letters of recommendation for service academies. The witness stated that Mr. Posey reported directly to Representative Stockman.
13. The witness stated that Mr. Posey worked out of the Washington, DC congressional office until late 2013 when he departed to Houston. The witness stated that the departure occurred in late summer or early fall, and prior to Mr. Posey's termination from the office. The witness stated that he does not know why Mr. Posey relocated to Houston, and never discussed the issue with Representative Stockman. The witness stated that he had minimal contact with Mr. Posey after he relocated to Houston, and does not know what he did in Houston and does not know whether he was working part-time or full-time for the congressional office or for Representative Stockman's campaign. When asked whether Mr. Posey's compensation changed when he relocated to Houston, the witness stated that he would not know.
14. The witness stated that he assumes that Mr. Posey's role on Representative Stockman's campaign was that of assistant treasurer based on what he saw on reports filed by the campaign with the Federal Election Commission, but he is not sure. The witness does not know what Mr. Posey did prior to working for Representative Stockman's congressional office.
15. The witness stated that he first met Thomas Dodd at the 2012 GOP Convention in Florida, and the witness understood that Mr. Dodd was a friend of Representative Stockman's from the Leadership Institute. The witness believes that Mr. Dodd was living in Florida at the time and commuting from home to the Convention.

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16. The witness stated that he was not responsible for hiring Mr. Dodd to work in Representative Stockman's congressional office, and that Mr. Dodd reported to Mr. Velleco.
17. The witness stated that Mr. Dodd's role in the congressional office was to manage issues involving foreign affairs, human trafficking, and the Sudan caucus. The witness stated that he tried to get Mr. Dodd involved in small business issues, but there was not a lot going on in that area at the time. The witness also recalled that Mr. Dodd did a lot of work with coordinating Representative Stockman and other Members' visits with ambassadors and representatives from various embassies.
18. The witness stated that at the same time Mr. Posey relocated to Houston Mr. Dodd also relocated to Houston as well. The witness does not know the reason behind the relocation or what Mr. Dodd did in Houston. The witness does not know whether Mr. Dodd worked for Representative Stockman's campaign in Houston or whether there were any changes in Mr. Dodd's compensation resulting from the relocation. The witness stated that he does not know whether Mr. Dodd worked part-time or full-time for the congressional office while in Houston.
19. The witness stated that he does not know what role Mr. Dodd played in Representative Stockman's campaigns, although he does not think that he was a consultant and the witness does not recall working with Mr. Dodd during the 2012 congressional campaign.
20. The witness stated that he believes that prior to working for Representative Stockman's congressional office Mr. Dodd worked for charities and that Mr. Dodd told him that at one point he even sold insurance, but the witness is not sure of Mr. Dodd's employment history.
21. The witness does not recall Mr. Posey or Mr. Dodd ever expressing a desire to leave Representative Stockman's congressional office, and the witness was not aware of a meeting in February of 2013 between Representative Stockman and Mr. Dodd and Mr. Posey in which they resigned from the congressional office. The witness stated that Mr. Dodd and Mr. Posey would have discussed that issue with Representative Stockman, noting that Mr. Posey's relationship with Representative Stockman "goes way back" and that the paperwork would have been handled by Mr. Velleco. With regard to the office's interaction with the CAO and the finance office, the witness stated that he assumes that interaction would have most likely been handled by Mr. Velleco.
22. The witness is not sure if the congressional office keeps personnel files.
23. The witness stated that he did not have any conversations with Representative Stockman about Mr. Dodd or Mr. Posey resigning from the congressional office, and is not aware of Representative Stockman having to convince Mr. Dodd or Mr. Posey to stay on.
24. The witness stated that he did not have any conversations with Mr. Posey or Mr. Dodd about making contributions to Representative Stockman's campaign. The witness stated that he learned about the contributions after they were made from reading the *Houston Chronicle*, and that he did not have any conversations with Mr. Posey, Mr. Dodd, or Representative Stockman about the contributions, the reports, or how to respond to the allegations after reading the

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Houston Chronicle. The witness stated that he also did not have any conversations with anyone about amending Federal Election Commission reports or about reattribution of the contributions.

25. The witness stated that he has not had any discussions with Representative Stockman or anyone else in the congressional office about the termination of Mr. Dodd and Mr. Posey from the congressional office, and he does not know why they were terminated or who made the termination decision.
26. The witness stated that he was not involved in preparing, or even aware of, an email response sent by Mr. Velleco to the OCE.
27. The witness stated that he has never been asked to make a contribution to Representative Stockman's campaign.
28. The witness stated that since the OCE review began, he has had conversations with Jack Daly about the review. The witness is under the impression that Mr. Daly is a legal counsel in Representative Stockman's congressional office. The witness also stated that he has had general discussions with other staffers in the office about receiving requests for information from the OCE, but the substance of the requests was not discussed.
29. The witness stated that he has never heard of The Ross Center.
30. The witness stated that he does not know Jeff Van Fleet, Dennis Hayes, or John Hart. The witness stated that he recalls meeting a man with the last name Garcia while he was working on Representative Stockman's campaign in 2012, but he is not sure if the man was Paul Garcia.
31. The witness stated that his only familiarity with Presidential Trust Marketing is from reading the *Houston Chronicle*. The witness has never discussed Presidential Trust Marketing with Representative Stockman.
32. The witness stated that Indian gaming issues are within the portfolio of issues that he manages.
33. The witness stated that he does not know Marney Bilodeau.
34. The witness stated that he does not believe he has had any communications with The United Auburn Indian Tribe or with The United Auburn Indian Community of Auburn Rancheria PAC.
35. The witness stated that he has had communications with The Alabama-Coushatta Tribe. The witness stated that he has been present in briefings from the Alabama-Coushatta Tribe when they have come by Representative Stockman's congressional office to discuss their case and their desire for a "class B" gaming permit with Representative Stockman. The witness knows the Tribal President was present in one or more of those briefings which included about eight to ten people, but is not aware if other representatives of the Tribe were present, or if the other persons in attendance were there on behalf of other tribes.
36. The witness stated that he has never discussed campaign contributions with The Alabama-Coushatta Tribe, but he recalled that representatives of the Tribe were present at a fundraising

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event for Representative Stockman held in the winter of 2013 in Washington, DC at Meyers & Associates, which the witness described as a Texas lobbying firm.

37. The witness stated that he does not know why the Tribe was invited, and that the event was an “ad hoc” event put together by the campaign. He recalled that only four to six people attended.
38. The witness recalled that Donny Ferguson or Rachel Coolidge sent out the invitation via email to an NRCC list. The witness stated that he, Ms. Coolidge, and Mr. Ferguson were in charge of planning the event, and that Ms. Coolidge probably checked the email correspondence about the event.
39. The witness stated that there were no conversations about the Alabama-Coushatta Tribe or about legislation at the event. The witness also stated that the only contact he had with the Tribe about campaign contributions was at the fundraiser.

This memorandum was prepared on January 23, 2014 after the interview was conducted on January 22, 2014. I certify that this memorandum contains all pertinent matters discussed with the witness on January 22, 2014.

Bryson Morgan
Investigative Counsel

EXHIBIT 9

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Subject to the Nondisclosure Provisions of H. Res. 895 as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE: Representative Stockman's District Director
REVIEW No(s): 13-6070
DATE: January 9, 2014
LOCATION: 8060 Spencer Hwy
Pasadena, TX 77505
TIME: 8:56 AM to 9:34 AM (approximate)
PARTICIPANTS: Scott Gast
Bryson Morgan

SUMMARY: The OCE requested an interview with the witness and she consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. The witness signed a written acknowledgement of the warning.
2. The witness is Representative Stockman's district director, working out of the Pasadena, Texas district office.
3. The witness stated that John Velleco is her immediate supervisor. The witness stated that Mr. Velleco is not Representative Stockman's chief of staff, but he is the legislative director and the administrative director.
4. The witness previously worked for sixteen years for Representative Ron Paul as his district director. The witness retired when Representative Paul completed his service in the United States House of Representatives. Shortly thereafter, Representative Paul recommended to Representative Stockman that he hire the witness as his district director, which Representative Stockman did. The witness began serving as Representative Stockman's district director on the day Representative Stockman was sworn into office.
5. The witness stated that she lives in Victoria, Texas, but commutes to Pasadena to work in the district office on Tuesday, Wednesday, and Thursday each week, and works remotely on Monday and Friday each week. The witness stated that there are two primary district offices: one in Pasadena and one in Orange, and an office that is open one day per week in Cleveland that is staffed by an Orange staffer. Bonnie Norman is an outside field representative based out of the Pasadena office, and Andre Joseph is with the wounded warrior project working for Speaker Boehner and assigned to the Pasadena office. Andre Joseph began working in the Pasadena district office after the end of the recent government shutdown. Richard Reed also works in the Pasadena office, answering correspondence.

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6. The witness stated that the Orange district office is staffed by David Covey and Jonathan Covey, who are caseworkers and field representatives. Wayne Prouse also works in the Orange district office on a part-time basis, and Mike Sheeran works in the Orange district office as a videographer.
7. The witness stated that no person that reports to her has broken any rules, and that she is in charge of all district staff. She stated that there is a "brick wall" between office and campaign matters.
8. The witness stated that she has never been to a campaign event for Representative Stockman or discussed the campaign with him. She stated that she does not know for certain who is working on Representative Stockman's campaign, but believes that there is a man named Gary working on the campaign and a man named John Clark working on the campaign.
9. The witness stated that she met Jason Posey and Thomas Dodd when they were on Representative Stockman's congressional staff.
10. The witness stated that John Velleco, Donny Ferguson, and Diana Shin are the Washington, DC staffers for Representative Stockman that to her knowledge have made visits to the district.
11. The witness stated that Mr. Posey and Mr. Dodd left the Washington, DC congressional staff sometime during or shortly before or after the summer of 2013 in order to become half-time campaign and half-time congressional staff based out of the Pasadena district office. She believes they worked in the Pasadena district office on Mondays and Fridays each week, but because the witness only worked in the district office on Tuesdays, Wednesdays, and Thursdays, she did not typically see them in the district office.
12. The witness stated that she believes Mr. Dodd was always a part-time staffer with Representative Stockman, but that Mr. Posey was a full-time employee until the change in the summer to part time when he moved to Texas.
13. The witness stated that all she knows about the termination of Mr. Posey and Mr. Dodd she learned from what she read in the *Houston Chronicle*, which was that Representative Stockman had immediately fired them when he learned about the contributions. The witness believes that Mr. Velleco also instructed the witness that Mr. Posey and Mr. Dodd were no longer allowed in the district office. The witness also recalled that Bonnie Norman had called Mr. Velleco to inquire about the firings and was told that they were no longer on the congressional staff.
14. The witness stated that Mr. Velleco handles paperwork for hiring and firing and leave forms.
15. The witness stated that the chief of staff is Mr. Clinkenbeard, but she has very little contact with him. She stated that in her experience, Mr. Clinkenbeard doesn't act like a chief of staff, and to her Mr. Velleco acts like a chief of staff.
16. The witness stated that she has had some contact with Mr. Posey since his termination. She stated that when he was fired she understood that he would continue working on Representative Stockman's campaign. The witness stated that she has referred campaign calls to him. The witness also stated that she saw Mr. Posey at a staff Christmas party. She recalled that Mr.

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Velleco, Mr. Posey, a man named Gary, and Donny Ferguson accompanied Representative Stockman to the party. The witness stated that she has not had any conversations with Mr. Posey regarding campaign contributions.

17. The witness stated that she has not had any communications with Mr. Dodd since the termination. In her words, Mr. Dodd is "just like gone." She has not seen or heard from him since his termination.
18. The witness stated that she has not had any communications with Representative Stockman regarding the terminations of Mr. Dodd and Mr. Posey, or with any other person with the exception of discussing the news articles with district staff. The witness stated that she has "very limited" contact with Representative Stockman.
19. The witness does not know who might have more regular contact with Mr. Posey or Mr. Dodd.
20. The witness stated that Representative Stockman did ask her at one point whether Mr. Posey and Mr. Dodd were working in the Pasadena district office on Mondays and Fridays, and the witness stated that she asked Bonnie Norman if they were working those days and Ms. Norman said they were. The witness then told Representative Stockman that they were working those days. The witness also stated that Mr. Posey and Mr. Dodd would occasionally use her desk and leave it a mess, so the witness knew that they had been in the office.
21. The witness stated that she was not aware that Mr. Posey and Mr. Dodd had made contributions to Representative Stockman's campaign at the time the contributions were made.
22. The witness stated that she conducted training with Representative Stockman's congressional staff on ethics and office policies on or about March 2013, which included a discussion of the prohibition on staff contributing to Representative Stockman's campaign, but Mr. Posey and Mr. Dodd skipped the training, which made the witness mad. She sent notes of the training to Representative Stockman, and was told by John Velleco that Mr. Posey and Mr. Dodd were given the notes of the training. The witness also stated that Mr. Posey and Mr. Dodd called her to apologize for missing the training.
23. The witness first heard of the terminations of Mr. Posey and Mr. Dodd from reading the *Houston Chronicle* report discussing the terminations.
24. The witness stated that the last time she spoke with Mr. Posey was on or about December 17th to refer a call for the campaign to him.
25. The witness stated that she has no idea where Mr. Posey is or where Representative Stockman's campaign is located.
26. The witness does not recall any discussions regarding Mr. Posey or Mr. Dodd wanting to resign from the office or attempting to resign from the office.
27. The witness is not familiar with The Ross Center.
28. The witness said that the name Jeff Van Fleet rings a bell, but she does not know him.

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29. The witness does not know Dennis Hayes.
30. The witness does not know John Hart.
31. The witness said that Paul T. Garcia may have worked on Representative Stockman's 2012 campaign, because the witness believes she had heard his name.
32. The witness stated that she has never been asked to make a contribution to Representative Stockman's campaign.
33. The witness recalled that after she conducted the ethics training she discussed the training with Representative Stockman, who agreed that staff could not give contributions to their employer.
34. The witness is not familiar with Presidential Trust Marketing.
35. The witness does not know Marney Bilodeau.
36. The witness has never had any communications with The United Auburn Indian Tribe, The United Auburn Indian Community of Auburn Rancheria PAC, or The Alabama-Coushatta Tribe, and has never been involved with or had discussions regarding Indian gaming legislation.
37. The witness does not know Rabih Zeidan.
38. The witness notified Representative Stockman when she received a Request for Information from the OCE. Representative Stockman instructed her to make sure to tell the truth, but he did not ask her any questions about the OCE Request.

This memorandum was prepared on January 14, 2014 after the interview was conducted on January 9, 2014. I certify that this memorandum contains all pertinent matters discussed with the witness on January 9, 2014.

Bryson Morgan
Investigative Counsel

EXHIBIT 10

Congress of the United States
House of Representatives
Washington, DC 20515-4336

December 5, 2013

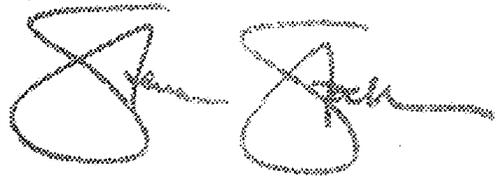
Director, Office of Payroll & Benefits
Chief Administrative Officer (CAO)
B215 Longworth HOB
Washington, DC 20515

Dear Mr. Butler:

I am requesting that the CAO process personnel actions for the termination of Thomas R. Dodd with an effective date of February 12, 2013 and the appointment of Mr. Dodd (reappointed to his position with no change in title or salary) with an effective date of February 13, 2013.

As the result of an administrative error, the ministerial recordation of these personnel actions via submission of a Payroll Authorization Form (PAF) to your office did not occur within two months of the effective date. Please accept and process the attached PAFs. Thank you for your assistance in this matter.

Sincerely,



RECEIVED
OFFICE OF PAYROLL & BENEFITS
JAN 2 2 50

Type of Payroll Actions					
Appointment <input checked="" type="checkbox"/>	Salary Adjustment	Leave Without Pay	Termination <input checked="" type="checkbox"/>	Overtime	Accrued Annual Leave

I hereby authorize the following payroll action:

EMPLOYEE NAME (FIRST-MIDDLE-LAST)		EFFECTIVE DATE (MM/DD/YYYY)	Employed By More Than One House Office? Y OR N <u>N</u>
Dodd, Thomas		2/12/2013	CAO I-9 SERVICE USED? Y OR N <u>N</u>
SOCIAL SECURITY NUMBER	EMPLOYEE ID. NUMBER	ACTION	
EMPLOYING OFFICE			
STOCKMAN, STEVE			
EMPLOYEE TITLE	Title Code		
Special Assistant	01583	<input type="checkbox"/> Appointment	<input type="checkbox"/> Title Change
CAO EMPLOYEE SERVICES USE ONLY		<input type="checkbox"/> Salary Adjustment	<input type="checkbox"/> Salary Adjustment With Title Change
PROCESS LEVEL <u>TX36Z</u>	DEPT <u>N/A</u>	<input checked="" type="checkbox"/> Termination	<input type="checkbox"/> Leave Of Absence
POSITION <u>TX36-P-ST5</u>		<input type="checkbox"/> Lump Sum Payment	<input type="checkbox"/> Overtime Payment
SUPERSEDES PREVIOUS ACTION?			
<input type="checkbox"/> YES (IF YES, ATTACH COPY OF SUPERSEDED ACTION)			
GROSS ANNUAL SALARY*	GROSS MONTHLY SALARY*		
\$ 50,600.00	\$ 4,216.67		
IMPORTANT: ANY ERASURES, CORRECTIONS, OR CHANGES ON THIS FORM MUST BE INITIALED BY THE AUTHORIZING OFFICIAL.		* If employee is a civil service annuitant, the gross annual and monthly salary stated above must include the annuity received by the employee plus the salary received from the employing office.	

ALL APPOINTMENTS AND SALARY ADJUSTMENTS FOR EMPLOYEES UNDER THE HOUSE EMPLOYEE POSITION AND CLASSIFICATION ACT MUST BE APPROVED BY THE COMMITTEE ON HOUSE ADMINISTRATION.

MEMBER TERMINATION	
REASON: <ul style="list-style-type: none"> RETIREMENT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO DECEASED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO TRANSFER <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <p>NOTE: THIS TERMINATION FORM MUST BE SUBMITTED AT THE SAME TIME OR PRIOR TO SUBMITTING AN APPOINTMENT PACKAGE IF THE NEW EMPLOYEE TO BE HIRED IS OCCUPYING THIS FTE BUDGET POSITION.</p>	<input checked="" type="checkbox"/> Permanent** <u>Non Permanent</u> <input type="checkbox"/> Temporary≈ <input type="checkbox"/> Shared** <input type="checkbox"/> Paid Intern≈ <input type="checkbox"/> Part-Time**

**BENEFITS ELIGIBLE ≈BENEFITS INELIGIBLE

2/12/2013
DATE (MM/DD/YYYY)


MEMBER SIGNATURE

STOCKMAN, STEVE
NAME OF MEMBER (PLEASE PRINT)

I hereby authorize the following payroll action:

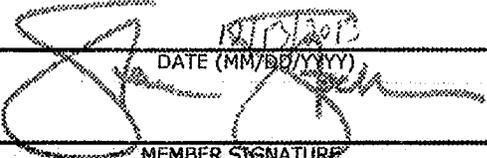
EMPLOYEE NAME (FIRST-MIDDLE-LAST)		EFFECTIVE DATE (MM/DD/YYYY)	Employed By More Than One House Office? Y OR N <u> N </u>
Dodd, Thomas		2/13/2013	CAO I-9 SERVICE USED? Y OR N <u> N </u>
SOCIAL SECURITY NUMBER	EMPLOYEE ID NUMBER	ACTION	
[REDACTED]	[REDACTED]		
EMPLOYING OFFICE			
STOCKMAN, STEVE			
EMPLOYEE TITLE	Title Code	<input checked="" type="checkbox"/> Appointment <input type="checkbox"/> Title Change <input type="checkbox"/> Salary Adjustment <input type="checkbox"/> Salary Adjustment With Title Change <input type="checkbox"/> Termination <input type="checkbox"/> Leave Of Absence <input type="checkbox"/> Lump Sum Payment <input type="checkbox"/> Overtime Payment	
Special Assistant	01583		
CAO EMPLOYEE SERVICES USE ONLY			
PROCESS LEVEL <u> TX36Z </u> DEPT <u> N/A </u>	POSITION <u> TX36-P-STS </u>		
SUPERSEDES PREVIOUS ACTION? <input type="checkbox"/> YES (IF YES, ATTACH COPY OF SUPERSEDED ACTION)		* If employee is a civil service annuitant, the gross annual and monthly salary stated above must include the annuity received by the employee plus the salary received from the employing office.	
GROSS ANNUAL SALARY*	GROSS MONTHLY SALARY*		
\$ 50,600.00	\$ 4,216.67		
IMPORTANT: ANY ERASURES, CORRECTIONS, OR CHANGES ON THIS FORM MUST BE INITIALED BY THE AUTHORIZING OFFICIAL.			

APPROVAL & SERVICE
 FEB 13 2013
 10:52 AM

ALL APPOINTMENTS AND SALARY ADJUSTMENTS FOR EMPLOYEES UNDER THE HOUSE EMPLOYEE POSITION AND CLASSIFICATION ACT MUST BE APPROVED BY THE COMMITTEE ON HOUSE ADMINISTRATION.

MEMBER APPOINTMENT	
<input type="radio"/> PRIOR FEDERAL SERVICE WITH BREAK <input type="radio"/> PRIOR FEDERAL SERVICE NO BREAK <input checked="" type="radio"/> PRIOR HOUSE SERVICE WITH BREAK <input type="radio"/> PRIOR HOUSE SERVICE NO BREAK <input checked="" type="radio"/> RE-EMPLOYED ANNUITANT	<input checked="" type="checkbox"/> Permanent** Non-Permanent <input type="checkbox"/> Temporary≈ <input type="checkbox"/> Shared** <input type="checkbox"/> Paid Intern≈ <input type="checkbox"/> Part-Time**

**BENEFITS ELIGIBLE ≈BENEFITS INELIGIBLE


 DATE (MM/DD/YYYY) 2/13/2013
 MEMBER SIGNATURE

STOCKMAN, STEVE

NAME OF MEMBER (PLEASE PRINT)

Congress of the United States
House of Representatives
Washington, DC 20515-4336

December 5, 2013

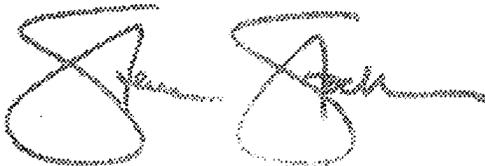
Director, Office of Payroll & Benefits
Chief Administrative Officer (CAO)
B215 Longworth HOB
Washington, DC 20515

Dear Mr. Butler:

I am requesting that the CAO process personnel actions for the termination of Jason T. Posey with an effective date of February 12, 2013 and the appointment of Mr. Posey (reappointed to his position with no change in title or salary) with an effective date of February 13, 2013.

As the result of an administrative error, the ministerial recordation of these personnel actions via submission of a Payroll Authorization Form (PAF) to your office did not occur within two months of the effective date. Please accept and process the attached PAFs. Thank you for your assistance in this matter.

Sincerely,



RECEIVED
OFFICE OF PAYROLL & BENEFITS
DEC 13 PM 2:50

Type of Payroll Actions					
<input checked="" type="checkbox"/> Appointment	<input type="checkbox"/> Salary Adjustment	<input type="checkbox"/> Leave Without Pay	<input checked="" type="checkbox"/> Termination	<input type="checkbox"/> Overtime	<input type="checkbox"/> Accrued Annual Leave

TERMINATE

I hereby authorize the following payroll action:

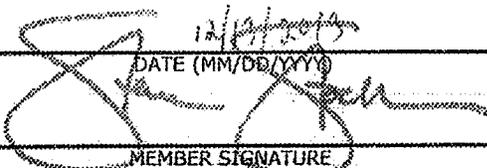
EMPLOYEE NAME (FIRST-MIDDLE-LAST)		EFFECTIVE DATE (MM/DD/YYYY)	Employed By More Than One House Office? Y OR N
Posey, Jason		2/12/2013	CAO I-9 SERVICE USED? Y OR N
SOCIAL SECURITY NUMBER	EMPLOYEE ID NUMBER	ACTION	
EMPLOYING OFFICE			
STOCKMAN, STEVE			
EMPLOYEE TITLE	Title Code		
Director of Special Projects	00604	<input type="checkbox"/> Appointment <input type="checkbox"/> Title Change <input type="checkbox"/> Salary Adjustment <input type="checkbox"/> Salary Adjustment With Title Change <input checked="" type="checkbox"/> Termination <input type="checkbox"/> Leave Of Absence <input type="checkbox"/> Lump Sum Payment <input type="checkbox"/> Overtime Payment	
CAO EMPLOYEE SERVICES USE ONLY		CONTROL & CONFIRMED TO BE EFFECTIVE 12 13 2013	
PROCESS LEVEL	DEPT		
TX36Z	N/A		
POSITION			
TX36-P-STS			
SUPERSEDES PREVIOUS ACTION?			
<input type="checkbox"/> YES (IF YES, ATTACH COPY OF SUPERSEDED ACTION)			
GROSS ANNUAL SALARY*	GROSS MONTHLY SALARY*		
\$ 60,000.00	\$ 5,000.00		
IMPORTANT: ANY ERASURES, CORRECTIONS, OR CHANGES ON THIS FORM MUST BE INITIALED BY THE AUTHORIZING OFFICIAL.		* If employee is a civil service annuitant, the gross annual and monthly salary stated above must include the annuity received by the employee plus the salary received from the employing office.	

ALL APPOINTMENTS AND SALARY ADJUSTMENTS FOR EMPLOYEES UNDER THE HOUSE EMPLOYEE POSITION AND CLASSIFICATION ACT MUST BE APPROVED BY THE COMMITTEE ON HOUSE ADMINISTRATION.

MEMBER TERMINATION	
REASON: <ul style="list-style-type: none"> RETIREMENT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO DECEASED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO TRANSFER <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO NOTE: THIS TERMINATION FORM MUST BE SUBMITTED AT THE SAME TIME OR PRIOR TO SUBMITTING AN APPOINTMENT PACKAGE IF THE NEW EMPLOYEE TO BE HIRED IS OCCUPYING THIS FTE BUDGET POSITION.	<input checked="" type="checkbox"/> Permanent** Non Permanent <input type="checkbox"/> Temporary≈ <input type="checkbox"/> Shared** <input type="checkbox"/> Paid Intern≈ <input type="checkbox"/> Part-Time**

**BENEFITS ELIGIBLE ≈BENEFITS INELIGIBLE

12/12/2013
DATE (MM/DD/YYYY)


MEMBER SIGNATURE

STOCKMAN, STEVE
NAME OF MEMBER (PLEASE PRINT)

I hereby authorize the following payroll action:

EMPLOYEE NAME (FIRST-MIDDLE-LAST)		EFFECTIVE DATE (MM/DD/YYYY)	Employed By More Than One House Office? Y OR N <u> N </u>
Posey, Jason		2/13/2013	CAO I-9 SERVICE USED? Y OR N <u> N </u>
SOCIAL SECURITY NUMBER	EMPLOYEE ID NUMBER	ACTION	
[REDACTED]	[REDACTED]		
EMPLOYING OFFICE		<input checked="" type="checkbox"/> Appointment <input type="checkbox"/> Title Change <input type="checkbox"/> Salary Adjustment <input type="checkbox"/> Salary Adjustment With Title Change <input type="checkbox"/> Termination <input type="checkbox"/> Leave Of Absence <input type="checkbox"/> Lump Sum Payment <input type="checkbox"/> Overtime Payment	
STOCKMAN, STEVE			
EMPLOYEE TITLE	Title Code		
Director of Special Projects	00604		
CAO EMPLOYEE SERVICES USE ONLY			
PROCESS LEVEL <u> TX362 </u> DEPT <u> N/A </u>			
POSITION <u> TX36-P-STS </u>			
SUPERSEDES PREVIOUS ACTION? <input type="checkbox"/> YES (IF YES, ATTACH COPY OF SUPERSEDED ACTION)			
GROSS ANNUAL SALARY*	GROSS MONTHLY SALARY*		
\$ 60,000.00	\$ 5,000.00		
IMPORTANT: ANY ERASURES, CORRECTIONS, OR CHANGES ON THIS FORM MUST BE INITIALED BY THE AUTHORIZING OFFICIAL.		* If employee is a civil service annuitant, the gross annual and monthly salary stated above must include the annuity received by the employee plus the salary received from the employing office.	

ALL APPOINTMENTS AND SALARY ADJUSTMENTS FOR EMPLOYEES UNDER THE HOUSE EMPLOYEE POSITION AND CLASSIFICATION ACT MUST BE APPROVED BY THE COMMITTEE ON HOUSE ADMINISTRATION.

MEMBER APPOINTMENT	
<input type="radio"/> PRIOR FEDERAL SERVICE WITH BREAK <input type="radio"/> PRIOR FEDERAL SERVICE NO BREAK <input checked="" type="radio"/> PRIOR HOUSE SERVICE WITH BREAK <input type="radio"/> PRIOR HOUSE SERVICE NO BREAK <input type="radio"/> RE-EMPLOYED ANNUITANT	<input checked="" type="checkbox"/> Permanent** Non Permanent <input type="checkbox"/> Temporary≈ <input type="checkbox"/> Shared** <input type="checkbox"/> Paid Intern≈ <input type="checkbox"/> Part-Time**

**BENEFITS ELIGIBLE ≈BENEFITS INELIGIBLE

DATE (MM/DD/YYYY)

MEMBER SIGNATURE

STOCKMAN, STEVE

NAME OF MEMBER (PLEASE PRINT)

EXHIBIT 11

STEVE STOCKMAN
36TH DISTRICT, TEXAS

FOREIGN AFFAIRS COMMITTEE

SUBCOMMITTEE ON AFRICA, GLOBAL
HEALTH, GLOBAL HUMAN RIGHTS, AND
INTERNATIONAL ORGANIZATIONS

SUBCOMMITTEE ON EUROPE, EURASIA,
AND EMERGING THREATS

SCIENCE, SPACE,
AND TECHNOLOGY COMMITTEE

SUBCOMMITTEE ON RESEARCH AND
SCIENCE EDUCATION

SUBCOMMITTEE ON SPACE AND
AERONAUTICS

Congress of the United States
House of Representatives
Washington, DC 20515-4336

October 31, 2013

326 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225- [REDACTED]

8060 SPENCER HIGHWAY
SAN JACINTO COLLEGE
BUILDING 1, ROOM 108
PASADENA, TX 77505
(281) 478- [REDACTED]

420 GREEN AVENUE
ORANGE, TX 77630
(409) 883- [REDACTED]

907 E. HOUSTON ST.
CLEVELAND CITY HALL
CLEVELAND, TX 77327
(409) 883- [REDACTED]

STOCKMAN.HOUSE.GOV

Off Cycle

Payroll & Benefits Manager, Office of Payroll & Benefits
Chief Administrative Officer
B215 Longworth HOB
Washington, DC 20515

APPROVED - *JFB*

10-15-2013 TERM. SUPERSEDES 09-30-13
TERM FOR THOMAS DODD (EEL [REDACTED]).

Dear James F. Butler:

I am requesting that the Chief Administrative Office (CAO) process a payroll supersedes action for Thomas Dodd (ID# [REDACTED]) regarding Termination with an effective date of 10/15/2103 and an annual salary of \$50,600.

We understand that the CAO is authorized to process a request for, or make payment of, a Payroll Authorization Form (PAF) that is submitted within two months after the proposed effective date of the action if the late submission of the PAF is due to an administrative error.

We submitted a PAF Termination in error, with an incorrect effective date of 09/30/2013. Please accept the attached original and revised documentation to process this action.

Thank you for your consideration in this matter.

Sincerely,

[Signature]
Steve Stockman

RECEIVED
2013 OCT 31 PM 12: 27
PAYROLL & BENEFITS

PAYROLL AUTHORIZATION FORM

U.S. HOUSE OF REPRESENTATIVES
Washington, DC 20515

(Please use Typewriter
or Ballpoint Pen)

To the Chief Administrative Officer of the House of Representatives: I hereby authorize the following payroll action:

Employee Name (First-Middle-Last)	Effective Date
Thomas R Dodd	10/15/13
Employee Social Security Number	Type of Action
██████████	<input type="checkbox"/> Appointment <input type="checkbox"/> Salary Adjustment <input type="checkbox"/> Title Change <input checked="" type="checkbox"/> Termination (At close of business on effective date) <input type="checkbox"/> Leave without pay (Beginning with effective date above and ending close of business (Specify date))
Employing Office or Committee/Subcommittee	
The Honorable Steve Stockman Texas - District 36	

(If type of action is an Appointment, Salary Adjustment or Title Change, complete appropriate information below.)

Position Title*	Gross Annual Salary**
Legislative Assistant	\$50,600.00

*Nonpermanent employees should be designated as Part-time Employees, Washington, DC Intern, Temporary Employees, or Shared Employees and will automatically receive the respective designation as their position title.

**If employee is a civil service annuitant (includes U.S. House of Representatives), the gross annual salary shown should include the annuity received by the employee plus the salary received from the employing office.

(If Clerk Hire employee, complete appropriate item(s) below.)

- Permanent
- Nonpermanent (must specify one of the following categories) †Denotes not eligible for Benefits
 - Part-Time Employee
 - †Paid Intern
 - †Temporary Employee
 - Shared Employee

NOTE: Any erasures, corrections or changes on this form must be initiated by the authorizing official.

(Specify one other employing authority)

RECEIVED
 2013 OCT 31 PM 12:27
 PAYROLL & BENEFITS

(If Employee of an Officer of the House, complete item below.)

Position Number.....If applicable, Level.....Step.....
 If position transfer, previous position number.....Level.....Step.....

All appointments and salary adjustments for employees under the House Classification Act must be approved by the Committee on House Administration.

10/31/13
Date of Signature


(Signature of Authorizing Official)

.....
(Signature of Subcommittee Chairperson or Ranking Minority Member)

The Honorable Steve Stockman
(Type or print name of Authorizing Official)

.....
(Type or print name and title of above official)

Texas - District 36
(Title--If Member, District and State)

Appropriation Code:	Office of Human Resources use only	Benefits.....
	(Monthly Annuity \$.....00)	Payroll.....
	as of	

ORIGINAL-TO OFFICE OF HUMAN RESOURCES (FOR OFFICIAL PERSONNEL FOLDER)

PAYROLL AUTHORIZATION FORM

U.S. HOUSE OF REPRESENTATIVE
Washington, DC 20515

Use Typewriter
or Ballpoint Pen

To the Chief Administrative Officer of the House of Representatives: I hereby authorize the following payroll action:

Employee Name (First-Middle-Last) Thomas R Dodd	Effective Date 09/30/2013
Employee Social Security Number [REDACTED]	Type of Action
Employing Office or Committee/Subcommittee The Honorable Steve Stockman Texas - District 36	<input type="checkbox"/> Appointment <input type="checkbox"/> Salary Adjustment <input type="checkbox"/> Title Change <input checked="" type="checkbox"/> Termination (At close of business on effective date) <input type="checkbox"/> Leave without pay (Beginning with effective date above and ending close of business <u> </u> / <u> </u> / <u> </u>) <small>(Specify date)</small>

(If type of action is an Appointment, Salary Adjustment or Title Change, complete appropriate information below.)

Position Title*	Gross Annual Salary**
Legislative Assistant	\$50,600.00

*Nonpermanent employees should be designated as Part-time Employees, Washington, DC Intern, Temporary Employees, or Shared Employees and will automatically receive the respective designation as their position title.
 **If employee is a civil service annuitant (includes U.S. House of Representatives), the gross annual salary shown should include the annuity received by the employee plus the salary received from the employing office.

(IF Clerk Hire employee, complete appropriate item(s) below)

- Permanent
- Nonpermanent (must specify one of the following categories) †Denotes not eligible for Benefits
 - Part-Time Employee
 - †Paid Intern
 - †Temporary Employee
 - Shared Employee

(Specify one other employing authority)

NOTE: Any erasures, corrections or changes on this form must be initialed by the authorizing official.

RECEIVED
 2013 OCT 17 PM 3: 05
 PAYROLL & BENEFITS

(IF Employee of an Officer of the House, complete item below.)

Position Number..... If applicable, Level..... Step.....
 If position transfer, previous position number..... Level..... Step.....
 All appointments and salary adjustments for employees under the House Classification Act must be approved by the Committee on House Administration

02/21/2013

Date of Signature

(Signature of Subcommittee Chairperson or Ranking Minority Member)

(Type or print name and title of above official)

[Handwritten Signature]
 (Signature of Authorizing Official)

The Honorable Steve Stockman
(Type or print name of Authorizing Official)

Texas - District 36
(Title--If Member, District and State)

RECEIVED
 2013 OCT 31 PM 2: 27
 PAYROLL & BENEFITS

Appropriation Code	Office of Human Resources use only	Benefits.....
	(Monthly Annuity \$.....00)	Payroll.....
	as of	

ORIGINAL TO OFFICE OF HUMAN RESOURCES (FOR OFFICIAL PERSONNEL FOLDER)

STEVE STOCKMAN
36th District, Texas

FOREIGN AFFAIRS COMMITTEE

SUBCOMMITTEE ON AFRICA, GLOBAL
HEALTH, GLOBAL HUMAN RIGHTS, AND
INTERNATIONAL ORGANIZATIONS

SUBCOMMITTEE ON EUROPE, EURASIA,
AND EMERGING THREATS

SCIENCE, SPACE,
AND TECHNOLOGY COMMITTEE

SUBCOMMITTEE ON RESEARCH AND
SCIENCE EDUCATION

SUBCOMMITTEE ON SPACE AND
AERONAUTICS

Congress of the United States
House of Representatives
Washington, DC 20515-4336

326 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225- [REDACTED]

8060 SPENCER HIGHWAY
SAN JACINTO COLLEGE
BUILDING 1, ROOM 108
PASADENA, TX 77505
(281) 478- [REDACTED]

420 GREEN AVENUE
ORANGE, TX 77630
(409) 883- [REDACTED]

907 E. HOUSTON ST.
CLEVELAND CITY HALL
CLEVELAND, TX 77327
(409) 883- [REDACTED]

STOCKMAN.HOUSE.GOV

October 31, 2013

On Cycle

Payroll & Benefits Manager, Office of Payroll & Benefits
Chief Administrative Officer
B215 Longworth HOB
Washington, DC 20515

APPROVED - JTB

*10-15-2013 TERM SUPERSEDES
09-30-13 TERM FOR JASON POSEY
(EEH [REDACTED])*

Dear James F. Butler:

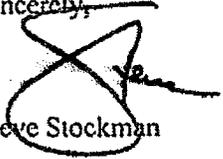
I am requesting that the Chief Administrative Office (CAO) process a payroll supersedes action for Jason Posey (ID# [REDACTED]) regarding Termination with an effective date of 10/15/2103 and an annual salary of \$60,000.

We understand that the CAO is authorized to process a request for, or make payment of, a Payroll Authorization Form (PAF) that is submitted within two months after the proposed effective date of the action if the late submission of the PAF is due to an administrative error.

We submitted a PAF Termination in error, with an incorrect effective date of 09/30/2013. Please accept the attached original and revised documentation to process this action.

Thank you for your consideration in this matter.

Sincerely,


Steve Stockman

RECEIVED
2013 OCT 31 PM 12: 26
PAYROLL & BENEFITS

PAYROLL AUTHORIZATION FORM

U.S. HOUSE OF REPRESENTATIVES
Washington, DC 20515

Supersedes (Please use Typewriter or Ballpoint Pen)
Supersedes

To the Chief Administrative Officer of the House of Representatives: I hereby authorize the following payroll action:

Employee Name (First-Middle-Last)	Effective Date
Jason T Posey	10/15/13
Employee Social Security Number	Type of Action
██████████	<input type="checkbox"/> Appointment <input type="checkbox"/> Salary Adjustment <input type="checkbox"/> Title Change <input checked="" type="checkbox"/> Termination (At close of business on effective date) <input type="checkbox"/> Leave without pay (Beginning with effective date above and ending close of business <u> / / </u>) <small>(Specify date)</small>
Employing Office or Committee/Subcommittee	
The Honorable Steve Stockman Texas - District 36	

On Cycle
TERMINATE

(If type of action is an Appointment, Salary Adjustment or Title Change, complete appropriate information below.)

Position Title*	Gross Annual Salary**
Senior Legislative Assistant	\$60,000.00

*Nonpermanent employees should be designated as Part-time Employees, Washington, DC Intern, Temporary Employees, or Shared Employees and will automatically receive the respective designation as their position title.
 **If employee is a civil service annuitant (includes U.S. House of Representatives), the gross annual salary shown should include the annuity received by the employee plus the salary received from the employing office.

Supersedes

(If Clerk Hire employee, complete appropriate item(s) below.)

- Permanent
- Nonpermanent (must specify one of the following categories) †Denotes not eligible for Benefits
 - Part-Time Employee
 - †Paid Intern
 - †Temporary Employee
 - Shared Employee

NOTE: Any erasures, corrections or changes on this form must be initialed by the authorizing official.

RECEIVED
 2013 OCT 31 PM 12:26
 PAYROLL & BENEFITS

(Specify one other employing authority)

(If Employee of an Officer of the House, complete item below.)

Position Number.....If applicable, Level.....Step.....
 If position transfer, previous position number.....Level.....Step.....
 All appointments and salary adjustments for employees under the House Classification Act must be approved by the Committee on House Administration.

10/31/13

 Date of Signature

[Signature]

 (Signature of Authorizing Official)

 (Signature of Subcommittee Chairperson or Ranking Minority Member)

The Honorable Steve Stockman

 (Type or print name of Authorizing Official)

 (Type or print name and title of above official)

Texas - District 36

 (Title--If Member, District and State)

Appropriation Code:	Office of Human Resources use only	Benefits.....
	(Monthly Annuity \$.....00)	Payroll.....
	as of	

ORIGINAL-TO OFFICE OF HUMAN RESOURCES (FOR OFFICIAL PERSONNEL FOLDER)

PAYROLL AUTHORIZATION FORM

U.S. HOUSE OF REPRESENTATIVES
Washington, DC 20515

VOID

(Please use Typewriter
or Ballpoint Pen)

To the Chief Administrative Officer of the House of Representatives: I hereby authorize the following payroll action:

Employee Name (First-Middle-Last) Jason T Posey	Effective Date 09/30/2013
Employee Social Security Number [REDACTED]	Type of Action <input type="checkbox"/> Appointment <input type="checkbox"/> Salary Adjustment <input type="checkbox"/> Title Change <input checked="" type="checkbox"/> Termination (At close of business on effective date) <input type="checkbox"/> Leave without pay (Beginning with effective date above and ending close of business _____) (Specify date)
Employing Office or Committee/Subcommittee The Honorable Steve Stockman Texas - District 36	

VOID

TERMINATE

(If type of action is an Appointment, Salary Adjustment or Title Change, complete appropriate information below)

Position Title* Senior Legislative Assistant	Gross Annual Salary** \$60,000.00
---	--------------------------------------

*Nonpermanent employees should be designated as Part-time Employees, Washington, DC Intern, Temporary Employees, or Shared Employees and will automatically receive the respective designation as their position title.
**If employee is a civil service annuitant (includes U.S. House of Representatives), the gross annual salary shown should include the annuity received by the employee plus the salary received from the employing office.

(If Clerk Hire employee, complete appropriate item(s) below.)

- Permanent
- Nonpermanent (must specify one of the following categories) †Denotes not eligible for Benefits
 - Part-Time Employee
 - †Paid Intern
 - †Temporary Employee
 - Shared Employee

(Specify one other employing authority)

NOTE: Any erasures, corrections or changes on this form must be initiated by the authorizing official.

VOID
LETTER

RECEIVED
2013 OCT 31 3:12:27 PM
PAYROLL & BENEFITS

(If Employee of an Officer of the House, complete item below.)

Position Number..... If applicable, Level..... Step.....
 If position transfer, previous position number..... Level..... Step.....

All appointments and salary adjustments for employees under the House Classification Act must be approved by the Committee on House Administration.

03/04/2013
Date of Signature

(Signature of Subcommittee Chairperson
or Ranking Minority Member)

VOID

(Type or print name and title of above official)

[Signature]

(Signature of Authorizing Official)

The Honorable Steve Stockman
(Type or print name of Authorizing Official)

VOID

Texas - District 36
(Title--If Member, District and State)

Appropriation Code:	Office of Human Resources use only (Monthly Annuity \$.....00) as of	Benefits..... Payroll.....
---------------------	--	-------------------------------

ORIGINAL TO OFFICE OF HUMAN RESOURCES (FOR OFFICIAL PERSONNEL FOLDER)

EXHIBIT 12

1139

15-120540 DC
9804

FRIENDS OF STEVE STOCKMAN

P.O. BOX 57135
WEBSTER, TX 77598

DATE 10-15-2003

Ten Doll

PAY TO THE ORDER OF

two thousand five hundred dollars \$ *2,500* DOLLARS

REDEEMED IN FULL
AT THE BANK OF AMERICA
DATE

Bank of America

ACH R/T 054001204

for reimbursement of contributions

FOR

||| ||| ||| ||| ||| ||| ||| ||| ||| |||

1140

15-120540 DC
8004

FRIENDS OF STEVE STOCKMAN

P.O. BOX 57135
WEBSTER, TX 77598

DATE 10-15-2013

PAY
TO THE
ORDER OF

Tom Dadd

\$ 2,500

Five thousand five hundred dollars & no/100ths

SECURITY
PRINTED ON
RECYCLED PAPER



ACH R/T 054001204

FOR Reimbursement of Cont. b. t.



1141

15-120/540 DC
9004

FRIENDS OF STEVE STOCKMAN

P.O. BOX 57136
WEBSTER, TX 77598

DATE 10-15-2013

PAY
TO THE
ORDER OF

Ten Thousand

\$ 2500

Five hundred dollars ^{00/100} DOLLARS



ACH R/T 054001204

FOR Kim Christoff



FRIENDS OF STEVE STOCKMAN
P.O. BOX 57135
WEBSTER, TX 77598

1133

15 120 910 DC
8004

DATE 10-15-2011

PAY TO THE ORDER OF

Japan Post

\$ 2,500

five thousand five hundred dollars ~~00~~ DOLLARS

Bank of America

ACHRT 254001204

[Handwritten signature]

FOR DEPOSIT ONLY

MP [REDACTED] MP [REDACTED] MP [REDACTED]

1134

1513942Z
004

FRIENDS OF STEVE STOCKMAN

P.O. BOX 57135
WEBSTER, TX 77598

DATE: 10-15-2013

PAY TO THE ORDER OF

Jessie Post

\$ 2500

Two thousand five hundred dollars 00/100 DOLLARS

Bank of America

MARK 240012A

[Handwritten signature]

FOR DEPOSIT ONLY

NO 10: [REDACTED] NO [REDACTED]

FRIENDS OF STEVE STOCKMAN

P.O. BOX 57135
WEBSTER, TX 77598

1135

15-120/540 DC
8004

DATE 10-15-2013

PAY TO THE
ORDER OF

Jason Posey

Five hundred dollars 00/100

\$ 2500 DOLLARS



ACH R/T 05-1001204

[Handwritten signature]

FOR 100 payment



EXHIBIT 13

Jason T. Posey

• League City, TX 77573 • (281) 808-[REDACTED]

January 6, 2014

Mr. Paul Solis
Investigative Counsel
Office of Congressional Ethics
425 Third St. SW
Washington, DC 20024

Dear Mr. Solis:

I write to you today because I am informed you are seeking more information concerning contributions to the campaign of Congressman Steve Stockman, whom I have known since 1995, made by me and Tom Dodd, my former roommate and colleague.

In my recent capacities as a House employee, treasurer of the Friends of Congressman Steve Stockman committee, and campaign donor, I do feel I am in a unique position to shed some light on this matter. I became a House staffer on January 3, 2013 and became the new campaign treasurer several weeks later on January 30.

In early February, Tom Dodd and I came to the conclusion the campaign's funds were minimal and its debts substantial. We jointly determined it was an appropriate time for us to fulfill our pledge (of financial support for the Congressman's campaign) he and I made to each other in the fall of 2012.

After Tom and I resigned from our respective positions in the Congressman's personal office on February 12, each of us made three donations in the amount of \$2,500. Weeks later, I transcribed those six donations into a contribution spreadsheet that I sent to the campaign accountant - a volunteer named Dr. Rabih Zeidan - for him to put into the software he used to generate the Q1 FEC Report.

Dr. Zeidan told Tom and me he thought our donations might look unseemly to some because we had ultimately returned to federal service not long after we made our contributions. He (Zeidan) advised us the FEC reattribution rule would authorize him to reattribute the contribution to a close family member rather than to us, the actual donors. He didn't get into it

USPROCE JAN22 14 001055

much farther than that, and frankly I had been the treasurer for only a few weeks and did not consider myself an expert on the point (and for good reason).

I of course now understand the reattribution rule, and know it had no application in our circumstance, and yes, I do feel somewhat foolish for not having challenged him or consulted an attorney.

In my defense, let me point out that Dr. Zeidan is a CPA and a PhD, and I knew he had been doing some FEC reporting work off and on since the 1990s. Quite frankly I thought he knew what he was doing, and we just more or less did what he asked - which was to give him the name of a close family member so he could do a reattribution.

As far as I am aware, Congressman Stockman was never in the loop on any of this. I can say with certainty I do not recall any conversation or communications of any type I had with the Congressman about a potential reattribution at the time Dr. Zeidan was preparing the FEC report.

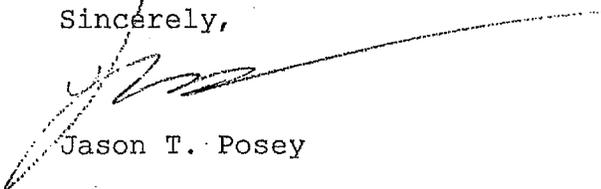
Actually, judging from the Congressman's reaction when he found out about all of this in the media three months ago, it was apparent to me that this came as a complete shock to him. He was not happy with us to say the least. Had we consulted him in advance I have no doubt this FEC reporting error would never have gotten by him.

Please note the earlier filed Q1 FEC reports showed the subject campaign contributions as having been made on February 21, 2013. That is because that was the date on which the funds were actually put into the campaign account rather than the date the checks were delivered to and received by the campaign. Usually the precise date on which a contribution is officially "received" by a campaign is a matter of great informality and of negligible consequence.

But because this is an unusual circumstance in which the date the contribution is officially might make a true legal difference, in November the campaign filed an amendment that reflects the actual, legal date on which the six subject contributions were made: February 12, 2013. I am including a copy of that amended FEC report in case it is helpful.

No other information seems relevant to your inquiry comes to mind, but you are welcome to contact me if I can be of further assistance.

Sincerely,


Jason T. Posey

I Shiela M. Heath, Notary Public of and for the [state/commonwealth/district] of Alaqua City in the [city/county] of Galveston hereby certify that on the date appearing below Jason T. Posey [signor/attestor] came personally before me, and, being known to me personally to be the same, or having produced sufficient and legitimate proof that he/she is the same, signed the above statement in my presence, or attested to his/her signature thereon directly and personally to me.

These signatures or attestations being made this, the 6th day of Jan, 2014.

Shiela M. Heath SEAL:
NOTARY

My Commission Expires: Aug 17, 2017



EXHIBIT 14

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE: Representative Stockman's Military Legislative Assistant
REVIEW No(s): 13-6070
DATE: January 27, 2014
LOCATION: Office of Congressional Ethics
TIME: 2:16 PM to 3:02 PM (approximate)
PARTICIPANTS: Scott Gast
Bryson Morgan

SUMMARY: The OCE requested an interview with the witness and he consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. The witness signed a written acknowledgement of the warning.
2. The witness currently works in Representative Stockman's congressional office as a military legislative assistant. He has held this position since May of 2013. He previously worked as an intern in Representative Stockman's congressional office from March to April of 2013. Although the witness's title is legislative assistant, he has since taken on the duties of legislative correspondent and scheduler for the office. He took on the legislative correspondent duties in about June or July of 2013, and took on the scheduler duties when the office's scheduler began maternity leave in November of 2013.
3. The witness stated that he was hired directly by Representative Stockman and had no interaction with or interviews with anyone else in the office prior to being hired.
4. The witness stated that his legislative duties include veterans' issues and keeping an eye on the funding for a military base that is partially in Representative Stockman's district and that employs many of his constituents. The witness stated that his legislative correspondent duties include responding to constituent mail, and his scheduler duties involve handling requests made of Representative Stockman and sending those requests to him for feedback. The witness also stated that he does a lot of small projects for Representative Stockman and recently began handling reconciliation of an office MasterCard once each month under the supervision of John Velleco, the office's legislative director. The witness stated that he does not have any duties with regard to payroll.
5. The witness stated that Mr. Velleco is responsible for payroll, the budget, and finance issues, and that Mr. Velleco reports directly to Representative Stockman. The witness stated that Mr. Velleco does a lot of the duties traditionally assigned to a chief of staff because Kirk Clinkenbeard, the office's Chief of Staff, is visually impaired.

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6. The witness stated that his level of interaction with Representative Stockman is “pretty heavy” with regard to scheduling and getting him to and from events in the evening. The witness stated that he typically drives Representative Stockman to his evening events in Washington, DC.
7. The witness stated that he has not had much involvement in Representative Stockman’s campaigns, and that he is “not a campaign person.” The witness stated that if he receives a question for the campaign he forwards it to Gary Goldberg via email, but the witness stated that he does not know who Gary Goldberg is or what his position with the campaign is other than that Mr. Goldberg is Representative Stockman’s body man and scheduler for the campaign.
8. The witness stated that he does not know who else works on Representative Stockman’s campaign, and that Representative Stockman wants to be the campaign manager himself, because he does not like consultants.
9. The witness stated that he does know Jason Posey. He met Mr. Posey when the witness began interning in Representative Stockman’s congressional office in March of 2013. The witness stated that he did not know Mr. Posey prior to interning in the congressional office.
10. The witness stated that Mr. Posey’s role in Representative Stockman’s congressional office was administrative and managing the office’s supplies and other staff-assistant type work. Mr. Posey did not, to the witness’s knowledge, have any legislative or communications duties.
11. The witness stated that Mr. Posey worked in Representative Stockman’s Washington, DC congressional office until late May or early June when he relocated to the district to work in the district. The witness was not sure if Mr. Posey was going to work in the district office or on the campaign, or both. All he was told was that Mr. Posey was relocating to the district. Prior to his relocation, the witness recalls seeing Mr. Posey in the Washington, DC office almost every workday.
12. The witness stated that he believes Mr. Posey began living in Representative Stockman’s campaign office when he relocated to the district.
13. The witness stated that he does not know anything about Mr. Posey’s role in Representative Stockman’s campaigns except what he has read in the press.
14. The witness stated that he first met Thomas Dodd in 2012 when he was volunteering for Representative Stockman’s congressional campaign putting up campaign signs. He believes that Mr. Dodd was sleeping in the campaign office at the time and also helping out with campaign signs in the Pasadena, Texas area. The witness also recalls that Mr. Dodd may have attended a campaign victory party in the district that the witness attended.
15. The witness later worked with Mr. Dodd in Representative Stockman’s Washington, DC congressional office. He stated that Mr. Dodd’s was full time in the Washington, DC office and his role was concentrating on foreign affairs and legislative correspondence.
16. The witness stated that Mr. Dodd also relocated to the district at about the same time that Mr. Posey did, which was in May or June of 2013. He believes that he relocated to the district because Representative Stockman needed more people in the district to do outreach work and to

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let constituents know what Representative Stockman was doing for them. The witness believes that Representative Stockman may not have been happy with the performance of the Orange, Texas district staff. The witness stated that he does not know who Mr. Dodd reported to or anything about his compensation.

17. The witness stated that after Mr. Dodd relocated to the district he occasionally had contact with Mr. Dodd to arrange Representative Stockman's flights and pick-up and drop-off times at the airport.
18. The witness stated that he is not aware of Mr. Posey or Mr. Dodd wanting to resign from the congressional office, but stated that on one occasion a couple of months after the witness began working in the congressional office, Mr. Dodd became "frazzled" and Representative Stockman had to tell him to calm down, which Mr. Dodd did not like.
19. The witness stated that he was not aware that Mr. Posey or Mr. Dodd had made campaign contributions to Representative Stockman's campaign until he read about it in the *Houston Chronicle*. He heard that their parents had contributed to the campaign in the summer of 2013 because somebody in the office, likely Noel Fritsch, had looked it up and seen the contributions from the parents on Federal Election Commission reports, but later that year when the *Chronicle* article came out the witness learned that Mr. Posey and Mr. Dodd had apparently contributed.
20. The witness stated that he did not talk to Mr. Posey, Mr. Dodd, or Representative Stockman about the contributions.
21. The witness stated that Representative Stockman or Mr. Velleco warned the congressional office staff about the *Houston Chronicle* article in a staff meeting shortly before the article came out. According to the witness, the persons at the staff meeting were Representative Stockman, Mr. Velleco, Donny Ferguson, Dennis Roberts, Kristine Brakstad, Mr. Clinkenbeard, and the witness. The witness recalled that Representative Stockman said that the editor of the *Chronicle* had a "beef" with him from the 1990s and so the editor was running bad stories about him. The witness recalls that Mr. Velleco said that any questions about the articles should be redirected to Donny Ferguson. The witness does not recall any discussion in the meeting about the truth of the accusations in the articles, or any such discussion after the meeting. The witness recalled Representative Stockman frequently complaining about the editor of the *Chronicle*.
22. The witness stated that after the article came out he did not have any conversations with other congressional office staffers about the article. The witness stated that his reaction to the article was that the article was just what he did not need.
23. The witness stated that he was not involved in any response to the article and was not involved in amending any reports filed with the Federal Election Commission.
24. The witness stated that he first learned of Mr. Posey and Mr. Dodd's terminations from reading a press release issued by Mr. Ferguson. The witness did not have any conversations about the release with other congressional staff and does not know who made the termination decision, although he believes it was likely Representative Stockman. The witness stated that he was

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surprised that Mr. Dodd was terminated because Representative Stockman and Mr. Dodd were “almost like father and son.”

25. Since their terminations, the witness stated that he has had occasional contact with Mr. Posey and Mr. Dodd. He recalled mailing Mr. Posey a key to a storage unit that their furniture had been placed in after it was removed from their apartment, which they had shared. The witness stated that he has not had any conversations with Mr. Posey or Mr. Dodd regarding their terminations. He recalled that Mr. Dodd told him he is now doing consulting work with a firm in New York but living in the DC area because he likes DC. The witness does not know what Mr. Posey is doing.
26. The witness was not involved in preparing any office responses to OCE requests.
27. The witness stated that prior to speaking with the OCE he spoke with Jack Daly, who said that they were working on a response letter to the OCE. He also mentioned the OCE request to Mr. Clinkenbeard. The witness did not tell Mr. Daly that he was speaking with the OCE, and has not told Representative Stockman that he is speaking with the OCE either.
28. The witness is not familiar with The Ross Center.
29. The witness does not know Jeff Van Fleet, Dennis Hayes, John Hart, or Paul Garcia. The witness is not familiar with Presidential Trust Marketing and has not discussed it with Representative Stockman.
30. The witness stated that he is not involved in Indian gaming issues, and that such issues are probably handled by the chief of staff. The witness recalls that an Indian tribe came into the congressional office one day around September of 2013 and that Mr. Clinkenbeard staffed the meeting. The witness stated that he has never discussed campaign contributions with the tribe, but recalled that one day he spoke with a lobbyist, Larry Meyers, near the Capitol South metro station and Mr. Meyers told the witness that they needed to be careful about contributions from the tribe.
31. The witness stated that he believes Mr. Dodd and Mr. Posey were living in Representative Stockman’s campaign office because they were both “cheap” and did not want to spend the money to rent a place. The witness stated that he was under the impression that Mr. Dodd was “well off” financially, but did not know anything about Mr. Posey’s finances.

~~This memorandum was prepared on January 28, 2014 after the interview was conducted on January 27, 2014. I certify that this memorandum contains all pertinent matters discussed with the witness on January 27, 2014.~~

Bryson Morgan
Investigative Counsel

EXHIBIT 15

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OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE: Representative Stockman's Senior Community Representative
REVIEW No(s): 13-6070
DATE: January 9, 2014
LOCATION: 8060 Spencer Hwy
Pasadena, TX 77505
TIME: 9:44 AM to 10:10 AM (approximate)
PARTICIPANTS: Scott Gast
Bryson Morgan

SUMMARY: The OCE requested an interview with the witness and she consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. The witness signed a written acknowledgement of the warning.
2. The witness is the senior community representative in Representative Stockman's Pasadena, Texas district office. She began working for Representative Stockman on January 3, 2013.
3. With regard to her duties, the witness stated that she determined the Pasadena, Texas district office location and helped get the office up and running. She also stated that she attends lunches, government meetings, and tours plants, serving as Representative Stockman's liaison to the people of Clear Lake, Baytown, Cleveland, and Orange, Texas.
4. Prior to working for Representative Stockman, the witness worked for the Clear Creek Independent School District, in a family-owned insurance business, and for the United States Air Force in Germany.
5. The witness stated that she was very active in the local Republican Party, supporting an opponent of Representative Stockman in the 2012 Republican primary election. After that opponent was defeated, she began supporting Representative Stockman and told Representative Stockman's wife, Patti, that she wanted to work on his campaign. Approximately one week after Representative Stockman was elected, he offered the witness a job in the district office.
6. The witness stated that she has only attended three Representative Stockman campaign events: a birthday party, a fundraiser, and an event in River Oaks.
7. When asked who currently works on Representative Stockman's campaign, the witness stated that the campaign staff she is aware of are Gary, another man she described as tall and skinny. The witness stated that she does not know whether Jason Posey works on the campaign.

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8. The witness stated that she met Jason Posey at an election-night party for Representative Stockman held at a Springhill Suites hotel. When she met him she assumed that Mr. Posey had worked on Representative Stockman's 2012 campaign. With regard to Mr. Posey's employment in Representative Stockman's congressional office, the witness stated that she does not know what role Mr. Posey held, but that he would come into the district office to work one-to-two times per week. She stated that when he worked a second day in a week it was to cover for Thomas Dodd, who hardly ever showed up to work, or showed up to work "maybe once." The witness recalled that Mr. Posey's one-day-per-week work schedule in the Pasadena district office started "after April," referring to April, 2013. The witness thinks Mr. Posey also was working on Representative Stockman's campaign at the time, but she does not know the details.
9. The witness stated that she is not sure what Mr. Dodd did for Representative Stockman's congressional office, and that he perhaps came into the Pasadena office a couple of times. The witness believes that Mr. Dodd also was working on Representative Stockman's campaign, but she was not sure. As the witness stated, "I don't know what in the hell Tom was doing."
10. The witness stated that she was told that Mr. Posey and Mr. Dodd were terminated soon after the first *Houston Chronicle* article regarding the contributions was published. She was told this by either Jackie Gloor or John Velleco, but was not given a reason why they were terminated. She learned the reason for the terminations from the newspaper, and never discussed it with Mr. Posey or Mr. Dodd. The witness also stated that she never discussed the terminations with Representative Stockman, and that she hardly ever speaks with Representative Stockman.
11. The witness stated that she never spoke to Mr. Posey or Mr. Dodd regarding the campaign contributions at the time they were made or since that time.
12. The witness stated that she has never been asked to make a contribution to Representative Stockman, and stated that doing so is illegal.
13. The witness stated that the last contact she had with Mr. Posey was before Thanksgiving, when they discussed a flag. The witness did not recall exactly when she last had contact with Mr. Dodd, but believes it was in August of 2013.
14. The witness does not know what Mr. Posey or Mr. Dodd are doing now or where they are living.
15. The witness is not familiar with The Ross Center.
16. ~~The witness does not know Jeff Van Fleet.~~
17. The witness does not know Dennis Hayes.
18. The witness does not know John Hart.
19. The witness thinks that Paul Garcia was hanging around Representative Stockman's campaign during the final two weeks of the campaign, but she was unsure of his role on the campaign.
20. ~~The witness is not familiar with Presidential Trust Marketing.~~

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21. The witness has not been involved with or had discussions regarding Indian gaming legislation. She recalled that she was invited to attend an event on the issue, but did not go. The witness stated that she has never been a part of any conversation about campaign contributions from Indian tribes.
22. The witness does not know Rabih Zeidan.
23. The witness stated that she has not discussed the OCE's Request for Information with Representative Stockman, but she recalled asking Jackie Gloor what she should do with the Request.
24. The witness does not recall any discussions of Mr. Posey or Mr. Dodd resigning in early 2013.
25. When the witness receives calls regarding the campaign in the district office she refers the callers to a campaign phone number she has.
26. The witness stated that John Velleco is responsible for leave forms and reimbursements for Representative Stockman's congressional office.

This memorandum was prepared on January 14, 2014 after the interview was conducted on January 9, 2014. I certify that this memorandum contains all pertinent matters discussed with the witness on January 9, 2014.

Bryson Morgan
Investigative Counsel