

# APPENDIX C

The Honorable K. Michael Conaway  
1015 Longworth House Office Building  
Washington, DC 20515

The Honorable Linda T. Sánchez  
1015 Longworth House Office Building  
Washington, DC 20515

June 29, 2013

Dear Chairman Conaway and Ranking Member Sánchez:

This letter is in response to the Office of Congressional Ethics (OCE) Report and Findings and relates to an officially approved trip five years ago co-sponsored by the American Turkish Coalition (ATC) and the Turkish Coalition of America (TCA). Eight senior congressional staffers, six from the U.S. House and two from the U.S. Senate participated in the trip.

In 2008, I complied with all Committee on Ethics (Committee) official travel requirements, received Committee approval before the trip and filed the post travel disclosure report upon my return as required by House rules. I also personally communicated with the Committee staff to make sure my paperwork was in order before receiving notification the trip was approved. The OCE conclusions on page 12 state that I acted in good faith:

50. ATC and TCA submitted a pre-Travel disclosure form for the 2008 Turkey Trip to Ms. Hardin, which did not disclose that TCA retained a lobbyist.
51. The Board finds that Ms. Hardin did not knowingly accept travel expenses from an entity that retained a lobbyist because:
  - a. Ms. Hardin submitted the co-sponsors' pre-travel disclosure form to the Committee on Ethics for pre-approval;
  - b. Ms. Hardin submitted her personal pre-travel disclosure form, which was based on information that he received from the co-sponsors, to the Committee on Ethics for pre-approval;
  - c. Ms. Hardin provided a complete and accurate statement of all material facts related to the co-sponsors' employment of a lobbyist to the extent that it was known to her at the time; and
  - d. The Committee on Ethics provided written approval of her acceptance of the travel expenses.
52. Based on the above findings, Ms. Hardin acted in good faith reliance and did not know that TCA retained a lobbyist at the time of the trip. However, the Board recommends that

On January 28, 2013, four and a half years after the trip to Turkey, I learned from OCE staff for the first time of allegations that TCA had employed a lobbyist. A few days later I learned the

registered lobbyist's name for the first time, again, from OCE staff. The lobbyist, George Hochbrueckner has never contacted me, met or talked with me. He did not participate in the trip. The two sponsoring organizations did not follow up after the trip nor did anyone connected with the sponsoring organizations make any attempt to lobby me or our office. There was never any lobbying attempt made after the trip concluded. I only had incidental contact with the organizations since the trip.

During the OCE review, I fully complied with all requests for documents, answered all questions and cooperated fully with OCE staff. During the review, I learned for the first time that TCA self-reported its relationship with a lobbyist to the House Committee on Ethics in 2008 after it learned of the change in the House rules. TCA did not contact me and nor did the Committee on Ethics.

After receiving the information, the Committee made no determination related to me during the relevant time frame of the trip when the context and the facts were clearer. The issues have not changed in the ensuing four years and there is no new relevant information provided in the OCE referral. If the Committee didn't take action when it was timely, there seems to be no reason for the Committee to act at this time.

The one thing that has changed since 2008 is the House rule relating to privately sponsored Congressional travel. The rules were not adequate at the time of the trip and have since been updated.

The OCE's referral states that a violation of House Rules may have occurred. But the OCE review indicates that I made every effort to follow House rules. House rules are provided to prevent unethical behavior or wrong doing, not to highlight unintentional infractions.

The 2008 trip related directly to the official congressional business of our office and I received no personal benefit from this trip. A group of Tennessee citizens from our district contacted the office in strong support of the House Resolution on Armenian Genocide. I discussed the issue personally with these constituents. The office was also contacted by the U.S. State Department in equally strong opposition to the resolution based on the strategic importance of Incirlik Air Force Base in Turkey to the wars in Iraq and Afghanistan. In addition, a Turkish owned company is located in our congressional district and while in Turkey, I visited the headquarters of Kordsa Inc. which operates a manufacturing plant in Chattanooga, TN.

In closing, I emphasize that I did everything in compliance with both the letter and spirit of House rules. I ask that the Committee take that into consideration as you evaluate this referral. Thank you for allowing me to respond to the OCE findings. I am ready and willing to work with the Committee at your request.

Sincerely,

A handwritten signature in black ink, appearing to read "Helen Hardin", written over a horizontal line.

Helen Hardin