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The Honorable Michael Guest
Chairman, Committee on Ethics
United States House of Representatives

The Honorable Mark DeSaulnier
Ranking Member, Committee on Ethics
United States House of Representatives

Via Email: [redacted]@mail.house.gov

June 16, 2026

Dear Chairman & Ranking Member,

We write on behalf of our client, Representative Lance Gooden, in response to a referral your Committee recently received from the Office of Congressional Conduct ("OCC"). We respectfully request that the Committee carefully review the correspondence exchanged between us on behalf of Rep. Gooden and the OCC prior to drawing any conclusions regarding our client's cooperation. To be clear, throughout the OCC process Rep. Gooden expressed his willingness to provide evidence and explanations regarding any specific allegation. Instead, OCC refused to engage on any specific theories or concerns, and stubbornly insisted on playing hide-the-ball and not letting Gooden respond to any perceived issue.

During the course of the OCC's inquiry, Rep. Gooden was asked to produce over one year's worth of documents and communications spanning his official expenses, campaign expenses, and personal travel expenses. Upon review of that request, we formally communicated to the OCC that the scope of materials demanded was unreasonably burdensome and, in spirit of good-faith cooperation, offered to provide responsive materials if the OCC would identify the specific instances or transactions about which it sought further information. That offer was unequivocal and was made in writing.

The OCC declined to narrow its request, declined to pose specific questions, and made no effort to engage with the practical burdens and privacy concerns imposed by a demand of this magnitude on an active Member of Congress. Notwithstanding the referral's characterization of our client as uncooperative, a thorough review of the record will demonstrate precisely the opposite. It was the OCC, not Rep. Gooden, that declined to engage substantively with a sitting Member of Congress who volunteered to provide targeted responsive information.

Instead of pursuing that reasonable and offered path, the OCC apparently secretly (i.e. without any communication to Rep. Gooden) formulated allegations grounded in worst-case assumptions without affording Rep. Gooden the opportunity to respond, clarify, or provide supporting documentation and context that would have directly addressed their concerns. This is a fundamental departure from the cooperative process Rep. Gooden sought to participate in. OCC's characterization of their process throughout this referral is fundamentally dishonest, and their behavior here was counter-productive to their ostensible oversight mission.

Had the OCC been willing to engage with Rep. Gooden and share specific theories or concerns during the investigation, then OCC would have received responses with necessary context and supporting documentation as to each specific allegation that they have now revealed in their referral. As an example, the OCC alleges that Rep. Gooden might have improperly used official funds for campaign purposes based entirely on the coincidence that the reported campaign expense – a lunch with his Chief of Staff, Legislative Director, Legislative Aide, Finance Administrator, Defense Fellow and Communications Director at Bullfeathers Restaurant – was on the same day he took transportation from Dulles International Airport to that area for official business. What the OCC failed to ask about, and consequently account for in their referral – and what a simple inquiry to Rep. Gooden would have immediately clarified – is that Bullfeathers Restaurant is located less than one-tenth of a mile from the Cannon House Office Building. Rep. Gooden's official transportation to that area was for precisely that purpose. The campaign expense was a separately reported, separately funded staff lunch that was appropriately charged to the campaign. The geographic proximity of these two events on the same day is not evidence of improper use of official funds, but rather a reflection of the ordinary overlap inherent in the daily schedule of a working Member of Congress operating in and around the Capitol complex.

The referral also takes issue with Rep. Gooden's decision to decline a voluntary interview with the OCC. That decision was entirely reasonable and should not be construed as non-cooperation. A sitting Member of Congress should not be expected to subject himself to an interview – that may become part of the public record – without being informed of the specific purpose, scope, or subject matter of the interview. The OCC provided no such information. Agreeing to proceed under those circumstances would not have served the interest of truth or transparency. It would have created the very risk of incomplete or imprecise testimony that a fair investigative process is designed to avoid.

The referral further alleges that our firm's simultaneous representation of Rep. Gooden and his two staff members may have constituted a conflict of interest that obstructed the investigation. This allegation is offensive and without foundation. Our office represented Rep. Gooden's office as a whole, and a single unified response was submitted on behalf of all three individuals given that the requests directed at each were substantively identical. There was no divergence in interests, no divergence in position, and therefore no legal or ethical conflict in our representation. If the OCC had genuine questions about official expenses, the appropriate avenue was engagement with Rep. Gooden and his counsel, not the issuance of requests to staff that would predictably yield no additional information while creating the appearance of non-cooperation when declined. The "obstruction" dishonestly alleged here is a product of the OCC's own process and unwillingness to meaningfully engage with Rep. Gooden and his counsel.

Rep. Gooden remains fully committed to transparency and looks forward to working cooperatively with the Committee on Ethics to provide the context, documentation, and clarification necessary to resolve any outstanding questions. He welcomes the opportunity to demonstrate what the OCC's process did not allow: a complete and forthright accounting of the matters at issue.

We respectfully request that the Committee take into account the procedural shortcomings of the OCC's investigation as it evaluates the referral, and we stand ready to coordinate with the Committee's staff.

Respectfully,



Charles R. Spies
Dahlyn L. Sugrue
Counsel to Rep. Gooden

cc: Sydney Bellwoar, Committee on Ethics
Brittney Pescatore, Committee on Ethics