

**UNITED STATES HOUSE OF REPRESENTATIVES
COMMITTEE ON STANDARDS OF OFFICIAL CONDUCT**

Hon. _____, M.C.
Complainant

Hon. Roy Blunt, M.C.
Respondent

COMPLAINT

Parties

1. _____ is a duly elected member of the 109th Congress from the _____ District of _____.

2. Roy Blunt is a duly elected member of the 109th Congress from the 7th District of Missouri.

Jurisdiction

3. This complaint is brought pursuant to House Rule X, cl. 1(p), which assigns to the House Committee on Standards of Official Conduct (“Ethics Committee”) jurisdiction over all matters pertaining to the House *Code of Official Conduct*, which is codified at House Rule XXIII. In addition, House Rule XI, cl. 3(b)(2)(A) provides that the Ethics Committee may “undertake an investigation relating to the official conduct of an individual Member . . . or employee of the House only . . . upon receipt of information offered as a complaint in writing and under oath, from a Member . . . “

Background

Altria/Philip Morris

4. In November 2002, Rep. Blunt was named House Republican Whip. Hours after the announcement of his new role, Rep. Blunt tried to secretly insert a provision into Homeland Security legislation that would have made it harder to sell tobacco products over the Internet and

would have cracked down on the sale of contraband cigarettes. Jim VandeHei, GOP Whip Quietly Tried to Aid Big Donor; Provision Was Meant to Help Philip Morris, *The Washington Post*, June 11, 2003 (attached as Exhibit A); *see also* David D. Kirkpatrick, The DeLay Inquiry: The New Leader; Post Comes With Renewed Scrutiny of Record, *The New York Times*, September 30, 2005 (attached as Exhibit B). Rep. Blunt acted in the final hours before a vote on the domestic security legislation after talking with John F. Scruggs, vice president of government affairs for Altria. VandeHei, *The Washington Post*, June 11, 2003. Philip Morris, the tobacco division of the conglomerate Altria Group Inc., considered this provision to be vital, as it would have banned two practices of Philip Morris's competitors that cut into Philip Morris' profits. Kirkpatrick, *The New York Times*, Sept. 30, 2005. Philip Morris would have benefitted from the measure more than any other tobacco company because it was ahead of its competitors in the design and sale of safer cigarettes, the anticipated next regulatory step if the FDA gained regulatory power. VandeHei, *The Washington Post*, June 11, 2003.

5. What Rep. Blunt failed to disclose at the time he proposed the tobacco provision was that he was dating Abigail Perlman, a lobbyist for Philip Morris, whom he subsequently married. Id. In addition, Rep. Blunt's son, Andrew Blunt, was a lobbyist for Philip Morris, a major client Mr. Blunt picked up only four years out of law school. Editorial, Family Traditions, *St. Louis Post-Dispatch*, April 27, 2005 (attached as Exhibit C). Mr. Blunt's clients also include Altria-owned Kraft Foods as well as Miller Brewing Company, of which Altria owns 36 percent. Thomas B. Edsall, House Majority Whip Exerts Influence by Way of K Street, *The Washington Post*, May 17, 2005 (attached as Exhibit D).

6. Moreover, FEC records reveal that between October 18 and November 8, 2002, within days of being named House Majority Whip, representatives from Philip Morris, Kraft Foods, and Miller Brewing Company contributed a hefty \$32,400 to Rep. Blunt's PAC, Rely on Your Beliefs Fund ("ROYB"). Federal Election Commission (FEC) report, Rely on Your Beliefs' 2002 post-general filing, http://www.fec.gov/finance/disclosure/imaging_info.shtml. Overall, Philip Morris has been the largest contributor to Rep. Blunt's PAC, having contributed \$70,900 to ROYB between 1989 and 2006. Center for Responsive Politics, <http://www.capitaleye.org/leadpacdetails.asp?CID=N00005195>. In addition, according to FEC records, between 1997 and 2005 Altria's PAC contributed \$31,671 to Rep. Blunt's campaign committee, Friends of Roy Blunt.¹ FEC report for Friends of Roy Blunt, <http://www.fec.gov/finance/disclosure/norcomsea.shtml>.

United Parcel Service, Inc. and FedEx Corp.

7. The Altria/Philip Morris imbroglio was not the first time Rep. Blunt used his legislative powers to assist a family member. In April 2003, Rep. Blunt persuaded Senate Appropriations Committee Chairman Ted Stevens (R-AK) to insert a last-minute provision into a \$79 billion emergency appropriations bill for the war in Iraq, benefitting U.S. shippers like United Parcel Service, Inc. and FedEx Corp., by requiring that military cargo be carried only by companies with no more than 25% foreign ownership. Editorial, Brown and Blunt, *St. Louis Post-Dispatch*, April 9, 2003 (attached as Exhibit E); *see also* Editorial, All in the Family, *St. Louis Post-Dispatch*, November 28, 2004 (attached as Exhibit F); Dan Morgan, War Funding

¹ In a recently issued report, Public Citizen provided slightly different numbers. The Public Citizen report states that Altria/Philip Morris contributed a total of \$177,588 to Blunt's political committees: \$32,000 to his federal PAC, \$114,881 to his soft money PAC, and \$30,707 to his campaign committee. Public Citizen, Rep. Roy Blunt: Ties to Special Interests Leave Him Unfit to Lead, January 2006, p. 28.

Bill's Extra Riders, *The Washington Post*, April 8, 2003 (attached as Exhibit G); VandeHei, *The Washington Post*, June 11, 2003. United Parcel Service, Inc. and FedEx Corp. were seeking to block the expansion into the United States of a foreign-owned rival, DHL, a German firm then seeking to acquire Airborne Express of Seattle. Editorial, *St. Louis Post-Dispatch*, April 9, 2003.

8. Within months of the insertion of the provision, FedEx Corp.'s PAC contributed a total of \$9,500 to Rep. Blunt's campaign committee, Friends of Roy Blunt, and his leadership PAC, ROYB. Similarly, United Parcel Service's PAC made the maximum allowed contribution during an election cycle of \$10,000. Center for Responsive Politics, <http://opensecrets.org/pacs/expand.asp?strID=C00068692&Cycle=2004>.

9. Both UPS and FedEx have been generous contributors to Rep. Blunt's PAC and campaign committee. From 1997 to 2005, according to FEC records, FedEx's PAC contributed \$16,500 to Rely on Your Beliefs Fund and \$21,500 to Friends of Roy Blunt. Center for Responsive Politics, <http://opensecrets.org/pacs/lookup2.asp?strID=C00068692>; see also FEC report for Friends of Roy Blunt, <http://www.fec.gov/finance/disclosure/norcomsea.shtml>. Between 1997 and 2006, United Parcel Service's PAC contributed \$30,000 to ROYB and \$38,350 to Friends of Roy Blunt.² Center for Responsive Politics, <http://www.capitalelye.org/leadpacdetails.asp?CID=N00005195>; see also FEC report for Friends of Roy Blunt, <http://www.fec.gov/finance/disclosure/norcomsea.shtml>.

² Again, Public Citizens' analysis of the contributions resulted in slightly different numbers. According to Public Citizen, between 1999 and 2005, Federal Express and United Parcel Service donated a combined \$128,699 to Blunt's committees. FedEx contributed \$32,499 to Blunt's committees: \$16,000 to his federal PAC and \$16,499 to his campaign committee. UPS contributed \$96,200 to Blunt's committees: \$30,000 to his federal PAC, \$36,200 to his soft money PAC, and \$30,000 to Blunt's campaign committee. Public Citizen, Rep. Roy Blunt: Ties to Special Interests Leave Him Unfit to Lead, January 2006, p. 30.

10. Moreover, at the time Rep. Blunt inserted the provision, Andrew Blunt was a lobbyist on behalf of UPS in Missouri. Id.; Editorial, *St. Louis Post-Dispatch*, Nov. 28, 2004.

Foreign-Sponsored Travel

11. In January 2002, Rep. Blunt attended a luncheon for House Speaker Dennis Hastert in Seoul, Korea paid for by the Korea-U.S. Exchange Council (“KORUSEC”). John Bresnahan and Amy Keller, Korean Tycoon’s Big Plans, Network Wider Than DeLay, *Roll Call*, March 21, 2005 (attached as Exhibit H). In August 2001, KORUSEC registered with the U.S. Department of Justice under the Foreign Agents Registration Act. Id.

12. In March 2002, a delegation of senior congressional staffers, including aides to Rep. Blunt, also went to Seoul on a trip funded by KORUSEC. Id.

Ties to Jack Abramoff

13. Rep. Blunt has ties to well-known Republican lobbyist Jack Abramoff, who has pleaded guilty, *inter alia*, to conspiring to bribe public officials, including at least one Member of Congress and congressional staff. In June 2003, Mr. Abramoff persuaded then-Majority Leader Tom DeLay (R-TX) to organize a letter, co-signed by Speaker Hastert (R-IL), then-Whip Roy Blunt, and Deputy Whip Eric Cantor (R-VA), which was sent to the Secretary of the Department of Interior Gale A. Norton. In the letter, the House leaders – all of whom represented districts far away from Louisiana – expressed their opposition to a plan by the Jena Band of Choctaw Indians to open a casino on a non-reservation site expected to be outside Shreveport, Louisiana.

R. Jeffrey Smith, Foundation’s Funds Diverted From Mission, *The Washington Post*, September 28, 2004 (attached as Exhibit I). The view of gambling law expressed by Reps. Blunt, Hastert,

DeLay, and Cantor would have benefitted Mr. Abramoff's client, the Coushatta Tribe of Louisiana, by protecting the tribe's \$300 million yearly income from competition by the Jena Band. Id.

14. In fact, Rep. Blunt was a signator on a total of three letters sent to Secretary Norton, including one in May 2003 as well as the June 2003 letter, opposing any extension of tribal gambling. John Solomon and Sharon Theimer, Lawmakers Acted on Heels of Abramoff Gifts, *Associated Press*, November 17, 2005 (attached as Exhibit J). Around the time of the May and June letters to Secretary Norton, Mr. Abramoff contributed \$1,000 to Rep. Blunt's PAC, Rely on Your Beliefs Fund, and his lobbying firm contributed another \$2,000 to the PAC. Id.; *see also* Center for Responsive Politics, <http://www.opensecrets.org/pacs/pacgave.asp?strID=C00344648&Cycle=2004&txtSort=C>.

15. According to the Center for Responsive Politics, Rep. Blunt received a total of \$8,500 from Mr. Abramoff between 1999 and 2003. Center for Responsive Politics, http://www.capitaleye.org/abramoff_recips_detail.asp?type=R&Name=Roy+Blunt+%28R%2DMo%29.

16. In the spring of 2000, Rep. Blunt's PAC received a \$3,000 donation from another Abramoff client, Concorde Garment Manufacturing, a garment factory in the Northern Marianas Islands. For years Concorde has been the subject of allegations that it operates as a sweatshop, and in the 1990s it paid a \$9 million fine to the United States for failing to pay its workers overtime. John Solomon and Sharon Theimer, DeLay, Successor Blunt Swapped Donations, *Associated Press*, October 5, 2005 (attached as Exhibit K).

17. Concorde was also a pivotal member of the Marianas garment industry, which the Commonwealth of the Northern Marianas Islands sought to protect by hiring lobbyist Jack Abramoff. Mr. Abramoff, in turn, lobbied Reps. Blunt, DeLay, and others to keep the Northern Marianas Islands exempt from U.S. minimum wage and other federal labor laws. Id.

18. Reps. Blunt and DeLay, as well as some of their aides, met with Mr. Abramoff's lobbying team several times in 2000 and 2001 regarding Marianas issues, according to law firm billing records obtained by *Associated Press*. Id. On November 27, 2000, Mr. Abramoff's firm billed its Marianas Islands client for a meeting between its lobbying team and Blunt congressional aide Trevor Blackann. Key Events in DeLay-Blunt Donation Swaps, *Associated Press*, October 5, 2005 (attached as Exhibit L). The following year, on September 5, 2001, a member of Mr. Abramoff's Marianas Islands lobbying team met with one of Rep. Blunt's staffers to discuss strategy to defeat legislation that would have imposed the minimum wage on Marianas Islands employers. Id. Four days later, a member of Mr. Abramoff's lobbying team discussed the issue with Rep. Blunt himself. Id. And on September 30, 2001, Mr. Abramoff's lobbying team met with a staffer of Rep. Blunt to again discuss issues including the minimum wage legislation for the Marianas Islands. Id.

19. At Mr. Abramoff's upscale restaurant Signatures, where he wined and dined lawmakers and their aides, Rep. Blunt was listed as a "Friend of the Owner," a designation that meant Rep. Blunt could dine for free. Glen Justice, For Lobbyist, a Seat of Power Came With a Plate, *The New York Times*, July 6, 2003 (attached as Exhibit M).

Matt Blunt's Political Campaigns

20. Rep. Blunt's older son, Matt Blunt, who is currently the Governor of Missouri, has benefitted from his family connections in his several campaigns for political office. In June 2000, when Matt Blunt was running for Missouri Secretary of State, Rep. Blunt's leadership PAC gave \$100,000 to the Missouri Republican Party. Key Events in DeLay-Blunt Donation Swaps, *Associated Press*, Oct. 5, 2005. In turn, by election day the state party had contributed \$160,000 to Mr. Blunt's campaign for Secretary of State. Solomon and Theimer, *Associated Press*, Oct. 5, 2005.

21. Both Missourians for Matt Blunt and the 7th District Congressional Republican Committee list the same deputy treasurer and custodian of records on their IRS 8871 forms. 7th District Congressional Republican Committee, IRS Form 8871, Political Organization Notice of Section 527 Status, July 28, 2000; Missourians for Matt Blunt, IRS Form 8871, Political Organization Notice of 527 Status, September 18, 2000 (both attached as Exhibit O).

22. During that same campaign, Altria made a \$24,000 contribution to Matt Blunt's campaign, the maximum amount allowed under state law. Altria also made a \$100,000 contribution to the 7th District Congressional Republican Committee. David Goldstein, D.C. Lobbyists Aid Blunt, *Kansas City Star*, October 15, 2004 (attached as Exhibit N). In addition, Matt Blunt received \$65,000 from more than 80 of his father's colleagues in the House. Id.

23. The Missouri Ethics Commission found that during 1999 and 2000, Rely on Your Beliefs Fund made contributions and expenditures in excess of \$1,500 per year to support or oppose candidates and ballot measures in Missouri. Missouri Ethics Commission v. Rely on Your Beliefs Fund (No. A0106, Missouri Ethics Commission), Joint Stipulation of Facts, Waiver of Hearing Before the Missouri Ethics Commission, and Consent Order With Joint Proposed

Findings of Fact and Conclusions of Law, May 21, 2002 (attached as Exhibit P). Rely on Your Beliefs Fund did not, however, file a statement of organization with the Missouri Ethics Commission until July 21, 2000, nor did it file quarterly disclosure reports for July 15, 1999, October 15, 1999, or January 15, 2000, until July 25, 2000. Id. Accordingly, the Missouri Ethics Commission concluded that Rely on Your Beliefs Fund violated several Missouri state laws, including §130.021.5, RSMo Supp. 1999 (requiring an organization to file a statement of organization within 20 days of becoming a committee), §§130.041.1(3)(a) and 130.041.1(4), RSMo Supp. 1999 (requiring the filing of financial disclosure reports), and §130.04666.1(3), RSMo Supp. 1999 (requiring that disclosure reports be filed quarterly). Id. The Commission fined Rely on Your Beliefs Fund \$3,000 for these violations. Id.

24. During his 2004 gubernatorial race, Matt Blunt received more than \$30,000 from nearly three dozen influential Washington lobbyists and lawyers, including many who supported Rep Blunt. Goldstein, *Kansas City Star*, Oct. 15, 2004. Four Republican House members alone contributed nearly \$5,000, including \$1,200 from Rep. DeLay's political action committee, Americans for a Republican Majority (ARMPAC). Id.

25. Rep. Blunt also contributed to his son's gubernatorial campaign. Rely on Your Beliefs Fund gave \$1,200 to Matt Blunt in February, and another \$1,200 in June 2004. Ben Pershing, GOPers Give Generously to Blunt's Son, *Roll Call*, August 9, 2004 (attached as Exhibit Q).

26. Missouri law prohibits donors from giving money before the primary for both primary and general elections. Id. Because the gubernatorial primary took place after Rep.

Blunt made the two donations to Matt Blunt, Mr. Blunt had to return the second donation from the Rely on Your Beliefs Fund, which was made in violation of Missouri law. Id.

Money Laundering Scheme With Rep. DeLay

27. Recent reports indicate that Rep. Blunt participated with Rep. DeLay in a scheme that appears similar to the money-laundering scheme for which Rep. DeLay has been indicated in Texas. According to *Associated Press*, during the 2000 presidential election campaign, Rep. DeLay deliberately raised more money than he needed for convention parties and then diverted some of the excess funds to Rep. Blunt through a series of donations that benefitted both men. Solomon and Theimer, *Associated Press*, Oct. 5, 2005. Another of the beneficiaries of Rep. DeLay's largesse was Matt Blunt, who was then running for Secretary of State of Missouri. Id.

28. Well before the 2000 Republican presidential convention, Rep. DeLay and his political action committee, ARMPAC, transferred a total of \$150,000 to Rep. Blunt's PAC, Rely on Your Beliefs Fund. Solomon and Theimer, *Associated Press*, Oct. 5, 2005. In turn, Rely on Your Beliefs Fund made a series of payments to, among others, Rep. DeLay's foundation and a political consulting firm, the now defunct Alexander Strategies, Inc., which had been formed by Rep. DeLay's former chief of staff, Ed Buckham. Id. Rep. Blunt's PAC also donated \$100,000 generated by Rep. DeLay's convention fund-raising group to the Missouri Republican Party, which, in turn, spent more than \$160,000 on Matt Blunt's campaign for Secretary of State. Id.

29. Jack Abramoff and his lobbying team, who were then meeting with Rep. Blunt and his staff to enlist their help with issues relating to the Marianas Islands, were the original source for many of the funds Rep. DeLay raised ostensibly to cover the costs of convention parties. Solomon and Theimer, *Associated Press*, Oct. 5, 2005. The complicated funding scheme

effectuated by Reps. Blunt and DeLay was likely intended to disguise the root of the funding as well as the purposes for which the funds – initially solicited to cover the costs of convention parties – were actually put to use. Id.

COUNT I

BRIBERY

30. Federal law prohibits public officials from directly or indirectly demanding, seeking, receiving, accepting, or agreeing to receive or accept anything of value in return for being influenced in the performance of an official act. 18 U.S.C. §201(b)(2)(A). It is well-settled that accepting a contribution to a political campaign can constitute a bribe if a *quid pro quo* can be demonstrated. McCormick v. U.S., 500 U.S. 257, 273, 111 S.Ct. 1807, 1816 (1991); United States v. Biaggi, 909 F.2d 662, 665 (2d Cir. 1990), *cert. denied*, 499 U.S. 904 (1991).

31. In 2003, Rep. Blunt attempted to unilaterally and secretly insert a provision into pending Homeland Security legislation that would have benefitted Philip Morris at the expense of its competitors. Philip Morris, a division of Altria Group, Inc., is Rep. Blunt's largest campaign contributor and, along with Altria's PAC, donated more than \$100,000 to political committees tied to Rep. Blunt between 1997 and 2005. The provision was inserted mere hours before a vote on the domestic security legislation after Rep. Blunt talked with John F. Scruggs, vice president of government affairs for Altria, and within a few months after Rep. Blunt received \$32,400 in campaign donations from Altria-owned Philip Morris, Kraft Foods, and Miller Brewing Company.

32. By accepting large campaign contributions from Altria in apparent exchange for the insertion of legislation that would have benefitted Philip Morris by making it harder to sell

tobacco products over the internet and cracking down on the sale of contraband cigarettes, Rep. Blunt may have violated 18 U.S.C. §201(b)(2)(A).

33. Similarly, by accepting almost \$20,000 in campaign contributions from United Parcel Service, Inc. and FedEx Corp. mere months after inserting a provision into an emergency appropriations bill that would have benefitted UPS and FedEx by blocking competition and expanding their business, Rep. Blunt may have violated 18 U.S.C. §201(b)(2)(A).

34. Rep. Blunt's leadership PAC, Rely on Your Beliefs, accepted donations from Jack Abramoff and his lobbying firm while Rep. Blunt was signing letters to Interior Secretary Gale Norton that advocated a view of gambling law benefitting Mr. Abramoff's client, the Louisiana Coushatta. If, as it appears, Rep. Blunt accepted the campaign contributions in direct exchange for using his official position to assist the Coushatta tribe, Rep. Blunt may have violated 18 U.S.C. §201(b)(2)(A)

35. In the spring of 2000, Rep. Blunt's PAC received a \$3,000 donation from an Abramoff client, Concorde Garment Manufacturing. Thereafter, Rep. Blunt and his staff met several times with Mr. Abramoff's lobbying team to discuss strategy on minimum wage legislation that would have impacted the Marianas Islands. If, as it appears, Rep. Blunt accepted the campaign contribution in exchange for using his official position to defeat changes to federal minimum wage legislation that would have harmed Concorde Garment Manufacturing, Rep. Blunt may have violated 18 U.S.C. §201(b)(2)(A).

COUNT II

TAKING OFFICIAL ACTIONS FOR PERSONAL GAIN

36. Members of the House are prohibited from “taking any official actions for the prospect of personal gain for themselves or anyone else.” House Comm. on Standards of Official Conduct, “Memorandum For All Members, Officers and Employees,” Prohibition Against Linking Official Actions to Partisan or Political Considerations, or Personal Gain, May 11, 1999. House Members are directed to adhere to 5 CFR §2635.702(a), issued by the U.S. Office of Government Ethics for the Executive Branch, which provides:

An employee shall not use or permit the use of his Government position or title or any authority associated with his public office in a manner that is intended to coerce or induce another person . . . to provide any benefit, financial or otherwise, to himself or to friends, relatives, or persons with whom the employee is affiliated in a nongovernmental capacity.

37. By attempting to introduce legislation that would have benefitted Philip Morris and, as a consequence, his then-girlfriend and son who both worked as lobbyists for Philip Morris, Rep. Blunt may have violated 5 CFR §2635.702(a).

38. Similarly, by introducing legislation that would have benefitted United Parcel Service and, consequently, his son Andrew Blunt who worked as a lobbyist for United Parcel Service, Rep. Blunt may have violated 5 CFR §2635.702(a).

39. In addition, Rep. Blunt may have violated 5 CFR §2635.702(a) when he improperly used his political connections to funnel money through a local party committee into Matt Blunt’s, campaign committee.

40. Rep. Blunt’s participation with Rep. DeLay in a money-laundering scheme during the 2000 presidential campaign, which was apparently designed to hide the source and use of

funds solicited for the expressed purpose of financing Republican convention parties, may have violated 5 CFR §2635.702(a), given that Rep. Blunt diverted \$100,000 of the funds to the Missouri Republican Party to help finance his son Matt's campaign for Secretary of State.

COUNT III

HOUSE RULE XXVI, CLAUSE 5

41. House Rules provide that a Member, officer, or employee may not accept travel expenses from "a registered lobbyist or agent of a foreign principal." Rule 26, clause 5(b)(1)(A). This prohibition applies even where the lobbyist, agent, or firm will later be reimbursed for those expenses by a non-lobbyist client. House Comm. on Standards of Official Conduct, Travel Booklet.

42. Rep. Blunt's January 2002 trip to Seoul, Korea, which was paid for by the Korea-U.S. Exchange Council, a registered foreign agent, violates House Rule 26, clause 5(b)(1)(A). Similarly, the March 2002 KORUSEC-funded trip to Seoul taken by Rep. Blunt's aides also violates this provision.

COUNT IV

HOUSE RULE XXIII, CLAUSE 1

43. Rule 23 of the House Ethics Manual requires all members of the House to conduct themselves "at all times in a manner that reflects creditably on the House." Rule 23, clause 1. This ethics standard is considered to be "the most comprehensive provision of the code." House Comm. on Standards of Official Conduct, House Ethics Manual. When this section was first adopted, the Select Committee on Standards of Official Conduct noted that it was included within the Code to deal with "flagrant" violations of the law that reflect on Congress as a

whole,” and that might otherwise go unpunished. House Comm. on Standards of Official Conduct, Report under the Authority of H. Res. 418, H.Rep.No. 1176, 90th Cong., 2d Sess. 17 (1968). This rule has been relied on by the Ethics Committee in numerous prior cases in which the Committee found unethical conduct, including: the failure to report campaign contributions,³ making false statements to the Committee,⁴ accepting illegal gratuities,⁵ and accepting gifts from persons with interest in legislation in violation of the gift rule.⁶

44. Rep. Blunt’s various schemes to fund Matt Blunt’s political campaigns, including funneling money through a local party committee which, in turn, made contributions to Matt Blunt’s campaign committee, and Rep. Blunt’s use of two related entities – Missourians for Matt Blunt and the 7th District Congressional Republican Committee – do not reflect creditably on the House, in violation of Rule 23, clause 1.

45. The fact that Rep. Blunt’s PAC, Rely on Your Beliefs Fund, made contributions and expenditures in excess of state limits and failed to timely file a statement of organization or

³ House Comm. on Standards of Official Conduct, *In the Matter of Representative John J. McFall*, H.Rep.No. 95-1742, 95th Cong., 2d Sess. 2-3 (1978) (Count 1); *In the Matter of Representative Edward R. Roybal*, H.Rep.No. 95-1743, 95th Cong., 2d Sess. 2-3 (1978).

⁴ House Comm. on Standards of Official Conduct, *In the Matter of Representative Charles H. Wilson (of California)*, H.Rep.No. 95-1741, 95th Cong., 2d Sess. 4-5 (1978); H.Rep.No. 95-1743 at 3-4 (Counts 3-4).

⁵ House Comm. on Standards of Official Conduct, *In the Matter of Representative Mario Biaggi*, H.Rep.No. 100-506, 100th Cong., 2d Sess. 7, 9 (1988) (Member resigned while expulsion resolution was pending).

⁶ House Comm. on Standards of Official Conduct, *In the Matter of Representative Charles H. Wilson (of California)*, H.Rep.No. 969-930, 96th Cong., 2d Sess. 4-5 (1980); see 126 Cong. Rec. 13801-20 (June 10, 1980) (debate and vote of censure).

quarterly disclosure reports with the Missouri Ethics Commission does not reflect creditably on the House, in violation of Rule 23, clause 1.

46. Rep. Blunt's having Rely on Your Beliefs Fund make two separate contributions to Matt Blunt's gubernatorial campaign in violation of Missouri law does not reflect creditably on the House, in violation of Rule 23, clause 1.

47. Finally, Rep. Blunt's participation with Rep. DeLay in a money-laundering scheme that appears to have been intended to hide the source of funds solicited to cover the costs of Republican parties held during the 2000 convention, as well as the diversion those funds into Matt Blunt's campaign for Missouri Secretary of State, does not reflect creditably on the House, in violation of Rule 23, clause 1.

Conclusion

The United States Constitution gives the House of Representatives the power to create its own rules and the power to police its Members. As a result, it is incumbent upon the Members of the House to protect the integrity of the House. In fact, the Committee on Standards of Official Conduct was created for this express purpose.

Unfortunately, in recent years, the House has abdicated this responsibility. Congressman Blunt's ability to flout federal law and House Standards of Official Conduct in multiple ways over a period of years without reprisal is proof of this abdication of responsibility. This complaint offers the House of Representatives, acting through the Committee on Standards of

Official Conduct, the opportunity to uphold the integrity of the House by initiating an immediate, thorough, and non-partisan investigation into Congressman Blunt's conduct.

Respectfully submitted,

Melanie Sloan
Executive Director
Citizens for Responsibility and Ethics in
Washington

I hereby certify that this complaint has a good faith basis and warrants consideration by the House Committee on Standards of Official Conduct.

Member of Congress

_____ District of _____

Sworn to and subscribed before me this ____ day of _____, 2006.

Notary Public