

SHOWING ANIMALS RESPECT AND KINDNESS

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Oklahoma Ethics Commission
2300 N. Lincoln Blvd., B-5
Oklahoma City, OK 73105

August 31, 2015

SHowing Animals Respect and Kindness hereby alleges a violation of the Oklahoma Ethics Act by Tom Buchanan, whose mailing address is c/o Oklahoma Farm Bureau, 2501 N.Stiles, Oklahoma City, OK 73105 and/or c/o Oklahoma Water Resources Board, 3800 N. Classen Blvd., Oklahoma City, OK 73118.

Mr. Buchanan simultaneously serves as the president of Oklahoma Farm Bureau and is vice chairman of the Oklahoma Water Resources Board. It is his position as general manager of the Lugert-Altus Irrigation District, however, that this complaint is focused on.

On September 5, 2014, United States Senator James Inhofe held a political fundraiser on the Lugert-Altus Irrigation District property (which is a project of the United States Bureau of Reclamation), with Mr. Buchanan present and participating in the political fundraiser. The fundraiser consisted of an "Old World Pigeon Shoot" and clay target shoot on the federally owned property that Mr. Buchanan manages (see Exhibit 1 for location). The only people allowed to participate in the activities were those who donated to Senator Inhofe's political campaign.

Our complaint is in three parts:

1. Use of Government Property for a Political Fundraiser

Oklahoma Code - Title 82, the Oklahoma Irrigation District Act, specifically states the following:

§82277.21. *Conflict of interest.*

B. Directors and employees shall not:

2. *Directly or indirectly spend district funds or permit any property of the district to be used for political campaigns;*

The event invitation (Exhibit 1) states that checks were to be made out to "*Inhofe Victory Committee 2014,*" and further defined it as being "*...a joint fundraising committee authorized by and formed to benefit Friends of Jim Inhofe and the Fund For A Conservative Future.*"

This was not a public event; security, in the form of two Kiowa County Sheriff deputies were stationed at the gate to keep anyone not associated with the political fundraiser outside of the property.

By allowing a political fundraiser to be held on on Irrigation District property, we believe Mr. Buchanan violated state law.

2. Violations of Oklahoma Anti-Cruelty Statutes

The "Old World Pigeon Shoot" consisted of 1,000 pigeons being hand thrown into the air, then shot at by participants who surrounded the shooting filed at set positions. Birds were shot, wounded, abandoned, kicked and killed. We contend that these acts violated Oklahoma's anti-cruelty statute 21 Okla. Stat. Ann. § 1685 and 21 Okla. Stat. Ann. § 1686.

21 Okla. Stat. Ann. § 1685:

- *Any person who shall willfully or maliciously torture, destroy or kill, or cruelly beat or injure, maim or mutilate any animal in subjugation or captivity, whether wild or tame, and whether belonging to the person or to another, or deprive any such animal of necessary food, drink, shelter, or veterinary care to prevent suffering; or who shall cause, procure or permit any such animal to be so tortured, destroyed or killed, or cruelly beaten or injured, maimed or mutilated, or deprived of necessary food, drink, shelter, or veterinary care to prevent suffering; or who shall willfully set on foot, instigate, engage in, or in any way further any act of cruelty to any animal, or any act tending to produce such cruelty, shall be guilty of a felony and shall be punished by imprisonment in the State Penitentiary not exceeding five (5) years, or by imprisonment in the county jail not exceeding one (1) year, or by a fine not exceeding Five Thousand Dollars (\$5,000.00). Any animal so maltreated or abused shall be considered an abused or neglected animal.*

21 Okla. Stat. Ann. § 1686(A):

- Any person owning or having charge or custody of a maimed, diseased, disabled, or infirm animal who abandons the animal or who allows the animal to lie in a public street, road, or public place one (1) hour after the person receives notice by a duly constituted authority that the animal is disabled or dead, upon conviction, shall be guilty of a misdemeanor.

Mr. Buchanan was filmed working at the fundraiser and throwing birds into the air to be shot (Exhibit 3).

In addition to specific acts of cruelty committed by Mr. Buchanan, the fact that he was the manager of the property, and that he allowed the event to be held on the Lugert-Altus Irrigation District property, means that he held overall responsibility for any/all acts committed on that property. As soon as he unlocked the gate to the area, he became responsible for what happened on the property.

3. Violation of Federal Law

The Lugert-Altus Irrigation District property is a project of the United States Bureau of Reclamation. The following regulations are from TITLE 43 — PUBLIC LANDS: INTERIOR [43 CFR], PART 423 — PUBLIC CONDUCT ON BUREAU OF RECLAMATION FACILITIES, LANDS, AND WATERBODIES [43 CFR 423]

http://cfr.regstoday.com/43cfr423.aspx#43_CFR_423p30

§423.30 Weapons, firearms, explosives, and fireworks.

(b) You must not discharge or shoot a weapon unless you are:

(1) Using a firearm or other projectile firing device lawfully for hunting or fishing as allowed under §423.32, or at an authorized shooting or archery range; and

(2) In compliance with applicable Federal, State, and local law.

(c) You must not use or possess explosives, or fireworks or pyrotechnics of any type, except as allowed by a permit issued pursuant to subpart D of this part 423, or in special use areas so designated by an authorized official under subpart E of this part 423.

The pigeon shoot was not a lawful hunting event, nor is the property an authorized shooting range. Therefore the discharge of shotguns on the property was illegal. In addition, a cannon was used at the fundraiser to fire two cannonballs at a nearby mountain range (Exhibit 4). This clearly violated section (c)

For all of these reasons, we contend that Mr. Buchanan has violated the Ethics Rules, and we call on the Ethics Commission to fully investigate our claims and hold Mr. Buchanan responsible for his actions.

Sincerely,

Steve Hindi
President, SHowing Animals Respect and Kindness

Exhibits

Exhibit 1: Location
Kiowa County, OK
34°52'29.9"N 99°18'21.6"W



Exhibit 2: The fundraiser invitation

10th Anniversary Inhofe Dove Hunt • Sept. 5 & 6

Gold Level Host
\$1,250 per person (\$2,500 per PAC)*
Special recognition as Gold Level Sponsor.
Friday host reception and dinner. Host location for Saturday morning hunt and lunch.
Includes commemorative 10th Anniversary Dove Hunt Pocket Knife.

Silver Level
\$500 per person (\$1,000 per PAC)*
Special recognition as Silver Level Sponsor.
Friday host reception and dinner. Host location for Saturday morning hunt and lunch.
Includes commemorative 10th Anniversary Dove Hunt Pocket Knife.

Non-Hunting Reception & Dinner Tickets \$250 per person
Friday host reception and dinner.

***Lodging not included**
RSVP, please contact Amanda Hall 405-418-7545 or amandahall@jiminhofe.com, or Amy Bradley 703-836-5351 or amyforbradley@comcast.net.
Fax completed form to 866-224-6886.

Lodge reservation deadline for guests and hunters is August 31, 2014 • Please Contact Amanda Hall

Gold Level Host - \$1,250 Individual - \$2,500 PAC
Please recognize _____ as Gold Level Sponsor
Name 1: _____ Name 2: _____
Shirt Size: _____ 20 Ga: _____ Shotgun Shell: 12 Ga: _____ 20 Ga: _____

Silver Level - \$500 Individual - \$1,000 PAC
Name 1: _____ Name 2: _____
Shirt Size: _____ 20 Ga: _____ Shotgun Shell: 12 Ga: _____ 20 Ga: _____

Non-Hunting Reception & Dinner Participant - \$250 per person
Name 1: _____ Name 2: _____

No, I cannot attend, but I wish to support Senator Inhofe and his campaign.

Enclosed is my contribution for \$1,250 \$500 \$250 Other \$ _____

Please make checks payable to: Inhofe Victory Committee 2014
Mail to Inhofe Victory Committee 2014, 901 N Washington St, Suite 700, Alexandria, VA 22314
Paid for by Inhofe Victory Committee 2014, a joint fundraising committee authorized by and formed to benefit Friends of Jim Inhofe and the Fund For A Conservative Future.

Joint Fundraising Notice and Contribution Guidelines
The Inhofe Victory Committee 2014 is a joint fundraising committee formed to benefit Friends of Jim Inhofe and the Fund For A Conservative Future.

Contributions to the Inhofe Victory Committee 2014 will be allocated as follows:

- For contributions from an individual or non-qualified PAC, the first \$5,200 received will be allocated to Friends of Jim Inhofe, with \$2,600 applied to the Primary 2014 election and \$2,600 applied to the General 2014 election. After June 24, 2014, Friends of Jim Inhofe will only be eligible to receive the first \$2,600 from an individual or non-qualified PAC applied to the General 2014.
- For contributions from an individual or non-qualified PAC, the next \$5,000 received will then be allocated to the Fund For A Conservative Future.
- For contributions from a multicandidate PAC, the first \$10,000 received will be allocated to Friends of Jim Inhofe, with \$5,000 applied to the Primary 2014 election and \$5,000 applied to the General 2014 election. After June 24, 2014, Friends of Jim Inhofe will only be eligible to receive the first \$5,000 from a multicandidate PAC.
- For contributions from a multicandidate PAC, the next \$5,000 received will then be allocated to the Fund For A Conservative Future.
- Any contribution to Inhofe Victory Committee 2014 by any donor which upon allocation is determined to exceed the contribution limit of that donor to one of the Participants shall be reallocated to the other Participant to the maximum contribution limit allowable from the donor to the Participants.
- Any contribution or portion thereof to Inhofe Victory Committee 2014 which is determined to exceed the contribution limit of that donor to both Participants, as proscribed by 2 U.S.C. § 441a, shall be returned to the donor.

Notwithstanding the allocation formula described above, contributions may be designated by the contributor for a specific Participant as specified below.

_____ I/we wish to allocate our joint or my individual contribution as follows (circle election(s) designated):

\$ _____ (self) \$ _____ (spouse) Friends of Jim Inhofe Primary 2014* or General 2014
\$ _____ (self) \$ _____ (spouse) Fund For A Conservative Future to Annual 2014

***After June 24, 2014, a donor may only contribute to Friends of Jim Inhofe's 2014 General election.**

Signature of Individual: _____
Signature of Spouse (if joint): _____

Name: _____ Spouse: _____
Employer: _____ Occupation: _____
Address: _____ City: _____ State: _____ Zip: _____
Home Phone: _____ Business Phone: _____
Fax: _____ Email: _____
By credit card: _____ VISA _____ MasterCard _____ American Express _____ Discover \$ _____
Card#: _____ Exp.: _____ Security Code: _____
Signature: _____

The maximum an individual or non-qualified PAC may contribute to the Inhofe Victory Committee 2014 is \$10,200 with \$5,200 allocated to Friends of Jim Inhofe for the Primary and General 2014 elections and \$5,000 allocated to the Fund For A Conservative Future. Couples may contribute \$20,400 from a joint account if each spouse so designates the contributions. Qualified multicandidate PACs may contribute \$15,000 to the Inhofe Victory Committee 2014, with \$10,000 allocated to the Friends of Jim Inhofe for the Primary and General 2014 elections and \$5,000 allocated to the Fund For A Conservative Future. Contributions are not deductible as charitable contributions for federal income tax purposes. Corporate contributions may not be accepted by Inhofe Victory Committee 2014 or either of the Participants. Federal law requires us to use our best effort to collect and report the name, mailing address, occupation and name of employer of individuals whose aggregate contributions exceed \$200 in a calendar year or election cycle.

10th Anniversary Inhofe Dove Hunt

**Friday, September 5th and
Saturday, September 6th, 2014**

**Quartz Mountain Lodge & Resort
Lone Wolf, Oklahoma**

Agenda

Friday, September 5th

- 12:00pm Registration and Lodge Check In
- 2:00pm Gather at Outdoor Amphitheater for Photos
- 2:45pm Group Photo Shoot
- 3:00pm "Old World" Pigeon Shoot on shooting ground with Five Stand
- 6:30pm Host Reception with Senator Inhofe &
Special Guests - To Be Announced
Including the famous "Wild Game Hors D'Oeuvres"
- 8:00pm Dinner with Senator Inhofe & Special Guests

Concert by Musical Guest Stoney LaRue

Saturday, September 6th

- 5:00am Breakfast at Lodge Restaurant
- 6:15am Depart Quartz Mountain Lodge for morning hunt
- 10:30am Lunch at Altus Cotton Gin

RSVP:

Amanda Hall at 405-418-7545
amandahall@jiminhofe.com
or

Amy Bradley at 703-836-5351
amyfordbradley@comcast.net.

**Lodge reservation deadline
for guests and hunters
is August 31, 2014**

Paid for by Inhofe Victory Committee 2014, a joint fundraising committee authorized by and formed to benefit
Friends of Jim Inhofe and the Fund For A Conservative Future

Exhibit 3: Mr. Buchanan working at the political fundraiser, throwing birds to be shot
(video available upon request)





Exhibit 4: Cannon being fired twice (video available upon request)





