

SHOWING ANIMALS RESPECT AND KINDNESS

PO Box 28

GENEVA, IL 60134

WWW.SHARKONLINE.ORG

Carolyn Lerner
Office of Special Counsel
1730 M Street, N.W., Suite 218
Washington, D.C. 20036-4505

August 31, 2015

Dear Ms. Lerner,

On September 5, 2014, US Senator James Inhofe of Oklahoma held a political fundraiser (Exhibit 1 and 2) in Kiowa County, Oklahoma. This complaint deals with what we contend are violations of the Hatch Act related to that event.

Part I: Use of federally funded state employees to work at the political fundraiser

Part of the fundraiser was a sporting clay shoot that was staffed by employees of the Oklahoma Department of Wildlife Conservation (ODWC). These employees were at the fundraiser and worked as instructors for the "Shotgun Training and Education Program" (STEP).

The most important issue regarding the Hatch Act is that, according to a document we received through a records request with the ODWC, titled "PROGRAMS AND PROCEDURES," (Exhibit 3) the STEP program is federally funded:

Federal Aid Project Numbers

The STEP program is part of the hunter education federal aid project. Please charge all time, mileage and travel against F12AF00622-001-01.

Senator Inhofe's fundraiser was not a public event. In fact, the public was specifically locked out of the event by armed security. The only people who were able to attend,

and therefore would be helped by the STEP instructors, had made a campaign donation to Senator Inhofe.

That means that these federally funded STEP program employees were working at a political fundraiser and personally supporting and instructing donors to Senator Inhofe's campaign. We believe that violates the Hatch Act.

In an additional document we received, the "PROGRAM REPORT FORM," it stated the full names of two of the employees who worked at the fundraiser, and the first name of the other two, which we later confirmed (Exhibit 4).

The following were listed as "STEP instructors" in the document:

Damon Springer — Senior Information and Education (I&E) Specialist for the STEP program

Greg Sexton — warden for Jackson County

Jeff Headrick — warden for Washita County

Jason Smith — I&E Specialist

In that same document, note that the "Program Contact Person" is Amanda Hall. Ms. Hall works for the Inhofe campaign and is also listed in Exhibits 1 and 2 as being a contact person to RSVP for the campaign fundraiser. In fact, the phone number listed in the "PROGRAM REPORT FORM," for Ms. Hall, 405-418-7545, is actually the phone number for Senator Inhofe's campaign office, which should have raised red flags with the STEP program, but did not.

<http://www.yellowpages.com/oklahoma-city-ok/mip/friends-of-jim-inhofe-480147143>

Friends of Jim Inhofe
7429 N May Ave,
Oklahoma City, OK 73116
(405) 418-7545

Furthermore, in an email communication we received from the OWDC (Exhibit 5) they explicitly state that the STEP program event is for Senator Inhofe's Dove Hunt, which is a well known annual fundraiser the Senator holds (please see Exhibit 1). It should also be noted that the invitation to the fundraiser was sent to the OWDC by the Inhofe campaign, so there can be no question that they had full knowledge that the event was purely political in nature, and that donations went to Senator Inhofe's PACs.

More disturbingly, in that same email, which was written by Damon Springer, Senior I&E Specialist for the STEP program, he states that they have worked at the Inhofe event *"...for years now."*

That means that "for years" federal money given to the STEP program has been used to facilitate a federal electioneering event.

Part II: Tom Buchanan, general manager, Lugert-Altus Irrigation District

Senator Inhofe's political fundraiser was held on land that is part of the Lugert-Altus Irrigation District, which is a project of the U.S. Bureau of Reclamation.

That means that the fundraiser was held on federally owned property, and that Mr. Buchanan used his position as general manager of federal land for this purely political purpose. Mr. Buchanan also worked at the fundraiser throwing birds for attendees to shoot at (exhibit 56). We believe his actions constitute a violation of the Hatch Act.

The address for the Lugert-Altus Irrigation District is 1421 W Ridgecrest Rd, Altus, OK 73521.

We respectfully ask for a full investigation into these matters.

Sincerely,

Steve Hindi
President, SHowing Animals Respect and Kindness



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 amyfordbradley@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: _____ Shotgun Shell: 12 Ga: _____ Shotgun Shell: 12 Ga: _____

Silver Level - \$500 Individual ~ \$1,000 PAC

Name 1: _____ Name 2: _____
Shirt Size: _____ Shotgun Shell: 12 Ga: _____ Shotgun Shell: 12 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: _____

Employer: _____

Address: _____

HomePhone: _____

Fax: _____

By credit card: _____ VISA _____ MasterCard _____ American Express _____ Discover _____ Security Code: _____

Card#: _____ Exp.: _____

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 multi-candidate 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 efforts 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.

Exhibits

Exhibit 1 - Flyer for the fundraiser

Exhibit 2 - Schedule of the fundraiser. Note the political language at the bottom stating this was paid for by a political committee. The sporting clay event, that STEP employees worked at, was held at 3:00PM in conjunction with the "Old World" pigeon shoot.


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

PROGRAMS AND PROCEDURES

Types of Programs

Types of programs offered include:

1. Wing Shooting Workshop - Provides instruction in wing shooting fundamentals. Stance, mount, sight picture, swing-through method and target assessment are all covered. Additionally, participants are exposed to nontoxic shot (steel) usage. Safe gun handling as well as hands on shooting are taught during this event. This is the most common workshop conducted. Participants vary greatly in experience and number, instructors must make the instruction fit the group present.
2. Nontoxic Shot Seminar - A technical look at nontoxic shot technology based on scientific information provided through CONCEPT. Shotshell lethality testing provides a complete overview for increased success in harvesting waterfowl, turkeys and upland birds, at the same time, helping to reduce wounding losses. This seminar is an important source of information designed to answer questions about nontoxic shot lethality and proper selection of equipment including gun/choke/load selection.
3. Hunter Skills Workshop - Designed for experienced and novice hunters wanting to improve their hunting skills. Special emphasis is focused on three important elements required to be a successful wing shooter including:
 - A. Distance estimation exercise - A short segment highlighting the importance of estimating distances within reasonable accuracy. This is accomplished in an outdoor setting using full bodied decoys positioned at different distances and angles which challenges the wing shooter's ability to determine if the target is within lethal range. A laser range finder is then used to provide distances of each target.
 - B. Pattern testing - Shotgun pattern testing with different loads and chokes. The CONCEPT Lethality Chart serves as a guide to verify proper shotgun performance and pattern density necessary to successfully harvest game.
 - C. Wing shooting exercise - Learning and practicing basic wing shooting skills is required to successfully harvest game with the least amount of wounding loss to the resource. A self test is conducted to establish the participants skill level by shooting at a 20-yard left to right crossing target. For the shooters successfully breaking six out of eight targets at this distance, the shooter will move back to the 30-yard marker and attempt to break six out eight. If the shooter is successful at this distance, they are allowed to progress backward in 10-yard increments until their skill level

has been established. Then basic wing shooting instruction begins with the purpose of assisting shooters to reach a higher skill level.

Scheduling Procedures

Remember, the STEP program coordinator manages the calendar for all programs. You must check with him for availability of equipment and supplies before committing to a group or program.

It is imperative that you give him as much lead time as you can (two to six months is best) when trying to schedule programs. Sometimes programs can be put together on shorter notice, but occasionally there are scheduling or logistic conflicts that prevent it.

Remember, this is a statewide program and as such equipment and supply logistics may require instructors to pick up and deliver equipment and supplies from other locations throughout the state.

1. Instructor requested programs:
 - A. Call the STEP coordinator to check equipment/trailer availability and schedule equipment and supplies.
 - B. Coordinate and plan trailer logistics of where and when you will pick up the trailer and where and when will you return/take it after the program.
 - C. Instructor needs to make sure the program site is suitable.
2. Group requested program through channels or STEP coordinator:
 - A. STEP program coordinator will contact instructors in the area and have them contact and coordinate with the group on possible program date and location.
 - B. Instructor then contacts the STEP program coordinator to check dates for equipment/trailer availability and schedule equipment and supplies.
 - C. Coordinate and plan trailer logistics of where and when will you pick up the trailer and where and when will you return/take it after the program.

Reporting Programs

Have a sign-in sheet available. You should make sure to record the total number of participants and a breakdown by adult men, adult women, youth men (<18) and youth women (<18). In addition, include the date conducted, location, group's name and instructors present. Remember to pass these program numbers on to the STEP

coordinator after the event.

Who can Request a Program?

This is an often asked question. Almost any group of people who want to learn basic shotgun wing shooting or hunting skills are welcome to request a program. Some examples include: women groups, school groups, youth groups, church groups, sportsman clubs, hunting dog clubs, conservation organizations, etc.

Sharing the Cost

Organizations that benefit from STEP program events are encouraged to assist with supplies and materials (ammo and targets) for events when possible. Many conservation organizations get shooting supplies and materials (ammunition, targets, etc.) donated to them and can assist to defray STEP program cost.

Participant Age Limitations

There is no minimum age for participation. The shooters age doesn't always apply. A good rule of thumb is a shooter must be able to physically handle a shotgun safely. Generally, youth participants under eight years old will not have the strength to control a shotgun safely. If a person has a bad experience shooting a shotgun for the first time, they will probably be lost forever as shooters.

Minimum Number of Participants

Groups requesting programs are encouraged to have a minimum of 10 participants to schedule a program. Ideally, 20-25 participants are the best compromise between adequate instructing time and waiting time of participants. Some large-scale programs may have 100s of participants. These programs are used as recruitment, exposure and promotional programs.

Federal Aid Project Numbers

The STEP program is part of the hunter education federal aid project. Please charge all time, mileage and travel against F12AF00622-001-01.

Program Safety Procedures

The safe handling of shotguns and ammunition is of utmost importance during programs. It's very important to discuss the rules of safety before any shooting starts. Explain what's expected of them as participants/students and then demonstrate and lead by example, remember, you are responsible for the overall safety of the program!

Safety begins and ends with the instructor and with each and every student.

- 1. All guns should be in the gun rack with their safeties on and actions open!**
- 2. No handling of guns except when shooting!**
- 3. Always keep complete control of guns and ammunition!**
- 4. Only the instructor has access to ammunition!**
- 5. Load only one shell at a time!**
- 6. Keep students a safe distance behind the shooting station!**
- 7. Always use the PVC shooting station frame!**
- 8. Everyone is required to wear ear and eye protection while shooting!**
- 9. Keep students away from target throwing machines!**
- 10. One shooter per instructor/machine!**

PROGRAM REPORT FORM

Program information:

Program Type: STEP ☒ Hunter Skills Steel Shot Seminar _____

Name of Group: Inhofe Shoot _____

Program Contact Person: Amanda Hall phone #: 405-418-7545
817-475-7142 (cell)

Program date: 9/5/14

Program location (Place, town, etc...): Quartz Mtn. State Park

STEP instructor(s): Damon, Jason, Greg Sexton, Jeff Heaulric

Participant information:

Adult males: 50 Adult females: 5

Youth males (<18): 0 Youth females (<18): 5

Total participants: 60

Materials used:

Ammo (# flats): 12 ga. 8 20 ga. 2

Targets (# cases): 20

Hunter Skills Seminars only:

Topics Taught: Wingshooting Skills _____ Pattern Test _____

Distance Est. (Subtending) _____

Notes:

Exhibit 5 - email from Damon Springer stating the STEP event is for Senator Inhofe, and that they have done the event for "...years now."

OKLAHOMA DEPARTMENT OF WILDLIFE CONSERVATION Mail... <https://mail.google.com/mail/u/0/?ui=2&ik=9f92482041&view=pt&se...>



Springer, Damon <damon.springer@odwc.ok.gov>

STEP Events

3 messages

Springer, Damon <damon.springer@odwc.ok.gov>

Mon, Aug 4, 2014 at 1:46 PM

To: Jeff Headrick <jeff.headrick@odwc.ok.gov>

Cc: Thor Carlson <thor.carlson@odwc.ok.gov>

Hey Jeff,

You may have heard about these events already, but I have the two in September we have done for years now.

Senator Inhofe Dove Hunt- September 5th from 3-5pm at Quartz Mtn Lodge.

NBC Bank Event- September 18th from 3-5pm at Hess, OK.

Do you think a couple of your guys would mind helping out with the Inhofe STEP event? I am trying to get with the OSU folks to see if they will help as well, but haven't yet. Might even enlist the FFA guys to assist too.

Do you think your guys could handle the NBC bank event this year without me? Greg has offered in the past and since it is not the day before the Inhofe event, it makes it a little harder for me to justify driving that far for that type of event. If not, I can come down.

Let me know one way or the other.

Thanks Jeff.

--

Damon Springer
Senior I & E Specialist
Shotgun Training Education Program
Cell 405-317-6316
Fax 405-396-2294

Exhibit 6: Tom Buchanan, manager of the federal land in question, working at the fundraiser.
he was throwing birds for donors to shoot at.



