

Rep. Brad Dee
111 West 5600 South
Ogden, Utah 84405

NATURE OF THE ALLEGED VIOLATIONS

1. The nature of the alleged violations include abuse of process, conduct in violation of civil standards that bring discredit upon the House as a whole, violations of the conflict of interest declaration and violations of campaign finance laws.

FACTS ALLEGED TO SUPPORT THE COMPLAINT

1. The allegations made against Rep. Hughes through the documents leaked to the news media should be reviewed.
2. Based upon information and belief, Rep. Phil Riesen abused his office and the legislative process by leaking an unsigned complaint to the media in violation of the ethics complaint process established by the *Rules of the Legislature* § JR6-3-101.
3. The leaked complaint contained allegations directed toward Riesen's colleague, Rep. Greg Hughes. The allegations are believed to be false and in violation of the civil standards for defamation, bringing discredit upon the House as a whole. *See* Attachment A.
4. Based upon information and belief, Riesen leaked the complaint roughly one month prior to the general election in an effort to cause maximum political damage to his colleague and to generate the most possible media exposure.
5. Based upon information and belief, Riesen obtained the privileges provided by this false information as a result of his official position. He then leaked it in order to advance an "Ethics Reform" proposal in violation of the *Code of Official Conduct*, which forbids using your official position to secure privileges for yourself. *See* § JR6-1-102(2)(g).
6. Based upon information and belief, Riesen had access to the unsigned complaint for several months, but deliberately leaked it on September 30, 2008, to create an "October Surprise" for his colleague and to provide a unique privilege to his colleague's democratic opponent. Based upon information and belief, Riesen obtained the privilege of this information due to his official position. He then used this information to benefit another person, which also violates the *Code of Official Conduct*. *See* § JR6-1-102(2)(g).

7. Finally, based upon information and belief, Riesen's complaint was prepared by special interest lobbyists and attorneys working in concert with Riesen and with Hughes' democratic opponent, and Riesen deliberately and illegally concealed the value of this in-kind donation from his disclosure in violation of *Utah Code* § 20A-11. See Attachment B.

DOCUMENTS THAT SUPPORT THE COMPLAINT

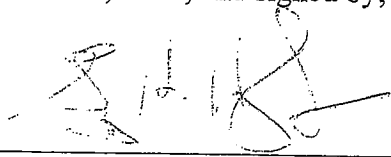
Documents in support of this complaint are attached as Attachments A and B.

PRAYER FOR RELIEF


WHEREFORE complainants respectfully request the House Ethics Committee:

1. Review the allegations addressed in this Complaint.
2. Review the allegations made by the unsigned, leaked complaint against Rep. Hughes.
3. Conduct a hearing that is as open to the public as allowed by rule.
4. Provide a clear Declaratory Judgment on the outcome of your review.
5. Require the recusal of any member of the Committee who had prior knowledge of the leaked information.


DATED this October 1, 2008, and signed by,



Rep. Greg Hughes



Rep. Kevin Garn



Rep. Brad Dee

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Attachment A

Document alleges attempted bribery of one legislator to another

September 30, 2008



An explosive allegation on Utah's Capitol Hill that one legislator offered another legislator a \$50,000 bribe to change her vote on the hot-button topic of school vouchers. The accusation is made as part of an effort by a group of lawmakers to force serious ethics reform in the Legislature.

Today, documents obtained by KSL include a letter from former GOP legislator Susan Lawrence claiming she was offered and twice turned down what amounts to a bribe.

In a signed letter Lawrence says she was offered tens of thousands of dollars in campaign money if she would switch positions on the voucher issue and vote yes. She says it was Draper Representative Greg Hughes who made the offer. He vehemently denies it.

Hughes said, "There is nothing illegal or unethical that ever took place. There was never a quid pro quo."

This morning at the Capitol a group of lawmakers met in Speaker Greg Curtis's office. Democrats Brad King and Roz McGee and Republican Sheryl Allen, all veteran House members, delivered to Curtis and House leaders a 16-page packet. It included three letters, one to the Speaker calling for "ethics reform" and asking him to help clean-up "the corruptive influence of money on (legislative) politics" and "what amounts to a 'pay to play' system."

The packet included an explosive set of accusations against Draper representative Hughes in a draft of a multi-part ethics complaint. On that list was "attempted bribery" of former representative Susan Lawrence.

In a signed letter, Lawrence, who did not return our calls, says in 2006 she was offered \$50,000 in campaign contributions, likely from those "funding and supporting school vouchers" if she would change positions and vote in favor of school vouchers or take a walk when the vote came up.

Lawrence, a Salt Lake Republican who lost her re-election bid that fall, writes it was fellow GOP lawmaker Greg Hughes, a top voucher supporter who made the offer.

Hughes said, "I think the letter refers to an alleged conversation that happened probably two and a half years ago. There isn't a conversation I've ever had with Susan that was unethical or illegal."

Hughes questions the timing of these allegations, five weeks before Election Day. He says talks with Lawrence were only about general help for her campaign, there was never any quid pro quo.

When asked if he offered to arrange for Lawrence to get campaign money if she'd change her vote, Hughes said, "No. At the time that she was running, she had a tough challenger, and we were looking to help colleagues as we would help any colleague. And we were trying to garner money and support and, uh, we talked about some groups that would be more inclined to help lawmakers in terms of how they vote."

House Speaker Greg Curtis would not return calls today regarding this morning's meeting in his office. The lawmakers who took the letter to the speaker have not yet signed the document, but others, including two Democrats, say they will.

Rep. Phil Riesen, (D) Salt Lake City, said, "They're serious charges. They need to be addressed seriously."

Rep. Neil Hansen, (D) Ogden, said, "It's time to now stand up, to be counted and say this is totally wrong. That the integrity of the legislature is now at stake."

Also today, as that meeting in the Speaker's office was taking place this morning, Hughes and the chief of staff to Speaker Curtis, Chris Bleak, got in a shouting match over the allegations in the garage at the Capitol. It got so heated, UHP troopers responded.

We asked Greg Hughes about it, and he described it as "no big deal."

E-mail: jdaley@ksl.com

All Contributions for Riesen, Phil

Attachment B

Name Address	Received	Amount	In Kind	Loan
Aggregate Contributions Various Various, UT 84111	04/02/2008	285.00	No	No
Bastian, Bruce W. 1384 N. 450 E. Orem, UT 84097	04/05/2008	2,000.00	No	No
Bernal, Philip 3615 Ceres Drive Salt Lake City, UT 84124	08/21/2008	50.00	No	No
Boyer, Barbara 1282 Ridge Meadow Ln #7r Midvale, UT 84047	06/25/2008	35.00	No	No
Comcast 1500 Market Street Philadelphia, PA 19102	06/09/2008	300.00	No	No
Consumer Lending Alliance 92 Royster Drive Crawfordville, UT 32327	01/17/2008	500.00	No	No
Cummins, Ken 1871 E. South Woodside Dr Salt Lake City, UT 84124	06/25/2008	30.00	No	No
Dodd, David 3471 Olympus View Drive Salt Lake City, UT 84124	06/25/2008	100.00	No	No
Energy Solutions 423 W. 300 S., Suite 200 Salt Lake City, UT 84101	01/18/2008	250.00	No	No
Foster, Marilyn 4409 Doris Way Holladay, UT 84124	05/03/2008	50.00	No	No
Gallivan, Mickey 1425 Arlington Drive SLC, UT 84103	03/22/2008	200.00	No	No

Hall, Charles 70 El Sereno San Francisco, CA 94127	06/25/2008	50.00	No	No
Hallbom, Tim 1109 Laguna Ave. Burlingame, CA 94010	07/05/2008	150.00	No	No
Hatch, Jeff 1704 Millcreek Way Salt Lake City, UT 84106	06/25/2008	100.00	No	No
Heyrand, Alyson 2382 Summerspring Lane SLC, UT 84124	03/07/2008	100.00	No	No
Hoole, Roger 4579 Farm Meadow Lane Salt Lake City, UT 84117	06/25/2008	100.00	No	No
Kittleson, Stephanie 3407 South 700 East Salt Lake City, UT 84106	06/24/2008	50.00	No	No
Klatt, Gene 951 East 8800 South Sandy, UT 84094	08/19/2008	100.00	No	No
Lawyers Involved For Utah 645 South 200 East Salt Lake City, UT 84111	05/30/2008	250.00	No	No
Lee, Helen 3433 Eastwood Drive Salt Lake City, UT 84107	06/25/2008	50.00	No	No
Lee, John 3127 South 3380 East Salt Lake City, UT 84109	06/25/2008	200.00	No	No
McFadden, Miriam 1369 Rainsborough Road Salt Lake City, UT 84124	06/25/2008	100.00	No	No
Medco Health Solutions Inc. 100 Parsons Pond Drive Franklin Lakes, NJ 07417	01/19/2008	250.00	No	No
Molina Healthcare 200 Oceangate, Suite 100	04/28/2008	500.00	No	No

Long Beach, CA 90802				
Nelson, Peter 4386 Albright Salt Lake City, UT 84124	08/13/2008	5.00	No	No
Pacific Power/Rocky Mountain Power 825 NE Multnomah Portland, OR 97232	05/14/2008	500.00	No	No
Paras, John 1212 Bateman Ponds Way West Jordan, UT 84084	03/07/2008	250.00	No	No
Planned Parenthood Action Council 21 G Street Salt Lake City, UT 84103	08/11/2008	2,700.00	No	No
Priskos, Vasilios 51 East 400 South Ste 210 Salt Lake City, UT 84111	07/05/2008	240.12	No	No
R & R Utah 900 South Pavilion Drive Las Vegas, NV 89144	07/05/2008	500.00	No	No
Rappaport, Rick 4143 Parkview Drive Salt Lake City, UT 84124	07/07/2008	250.00	No	No
Reilly, Ron 9158 N. Flint Way Park City, UT 84098	06/26/2008	50.00	No	No
Riddle, Jim 2929 Wardway Drive Salt Lake City, UT 84124	06/25/2008	100.00	No	No
Robert J. DeBry & Associates 4252 South 700 East Salt Lake City, UT 84107	07/05/2008	500.00	No	No
Select Health P.O. Box 30192 Salt Lake City, UT 84120	01/19/2008	300.00	No	No
Siegfried & Jensen 5664 South Green Street Murray, UT 84123	07/05/2008	500.00	No	No
Spencer, Joseph				

3379 South Los Altos Salt Lake City, UT 84109	08/21/2008	50.00	No	No
Teamsters Local 222 2641 South 3270 West Salt Lake City, UT 84119	08/18/2008	500.00	No	No
Thomas, Dave 4257 Shirley Lane Salt Lake City, UT 84124	08/21/2008	20.00	No	No
Thomas, Dave 4257 Shirley Lane Salt Lake City, UT 84124	06/25/2008	40.00	No	No
U.S. Mag 238 North 200 West Salt Lake City, UT 84116	08/21/2008	100.00	No	No
Utah Association Of Realtors PAC 230 West Towne Ridge Parkway Sandy, UT 84070	05/29/2008	2,000.00	No	No
Utah Manufactured Housing 8275 S. Eastern Avenue #200 Las Vegas, NV 89123	06/19/2008	300.00	No	No
Womens Democratic Club 3950 Kewanee Dr Salt Lake City, UT 84120-4120	06/03/2008	200.00	No	No
Workers Compensation Fund 392 East 6400 South Salt Lake City, UT 84107	07/05/2008	300.00	No	No
Zuhl, Michael 1063 Douglas Street Salt Lake City, UT 84105	07/05/2008	200.00	No	No