

OFFICE OF
GENERAL COUNSEL

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

2020 FEB 10 PM 2: 12

MUR # 7693

February 6, 2019

Re: Complaint For Excessive/Vague Personal Expense Reimbursements totaling \$141,260.69 for CY 2019: Congressman Lance Gooden (TX-05) and the Lance Gooden for Congress Committee

For calendar year 2019¹, the Lance Gooden for Congress Committee ("Committee") paid Congressman Lance Gooden ("Gooden") \$141,260.69 in cash through 23 disbursements described as "Expense Reimbursement."² This represents 30% of all expenditures by the Committee.³

Other than including a reference to "materials," there was no other explanation or detail provided for these substantial cash payments to Gooden or why Gooden would have advanced such large amounts for alleged campaign activities rather than having the Committee pay such expenses directly. Many of the amounts are also in surprisingly "round" numbers such as "10,400.00", "\$6,000.00", "\$9,700.00", "\$5,000.00", "\$8,000.00" and even consecutive cash payments of "\$5,500.00" in November-December 2019.⁴ The Committee has directly paid other expenditures as reflected in the Committee's filings for expenses related to clear campaign activities like consultants and advertising expenses.⁵

The amounts involved are grossly excessive when compared to other members of Texas's congressional delegation. According to FEC public filing data, neighboring Congressmen John Ratcliffe and Louie Gohmert had ZERO "Expense Reimbursements" for the previous three years.⁶ The cash payments to Gooden for "Expense Reimbursement" are 16.5 times larger than "Reimbursement" payments to all other Texas Congress members for the period Q1-3 2019.⁷

¹ There is evidence that the same conduct discussed herein occurred during Calendar Year 2018 as well, beginning in or around May 2018 after the Runoff election.

² See Exs. A-B attached hereto (printouts from FEC.gov public filing data).

³ See Ex. E at p. 3, Gooden's Committee expenditures for CY 2019 were \$477,399.54 according to public data on FEC.gov.

⁴ *Id.*

⁵ See generally FEC.gov public data reported expenditures by the Gooden Committee.

⁶ See. Ex. C (Summary of search results from FEC.gov public filing data for Ratcliffe/Gohmert "Reimbursements" since 1/1/2017)

⁷ See Ex. D print out from FEC.gov public data search results for "reimbursement" by all Texas Congress members other than Gooden totaling \$6,503.90.

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Further, the other Congress members provided detail explaining the purpose of the expenditure such as "catering," "mileage," "transportation" and "labels and inserts."⁸ In contrast, the vague "materials" was the only explanation provided by the Committee for the payments to Gooden.

The "Expense Reimbursement" payments to Gooden also seem excessive considering that Calendar year 2019 was a non-election year, that Gooden only became a candidate for re-election in November 2019, and Gooden did not have a primary election opponent until December 2019. The effect of the opaque reporting of "Expense Reimbursements" and "Materials" described above is that nearly 1/3 of the Committee's expenditures for Calendar year 2019, an amount of over \$140,000.00, do not identify the vendor paid or the precise purpose of the expenditure, nor an explanation of why such large sums were advanced by Gooden and reimbursed rather than paid directly by the Committee.

It is against federal law for a federal candidate/office holder to convert campaign contributions to personal use.⁹ I respectfully request that the "Expense Reimbursement" expenditures summarized above and reflected in the Exhibits hereto be investigated to determine if they were, in fact, legitimate campaign expenditures.

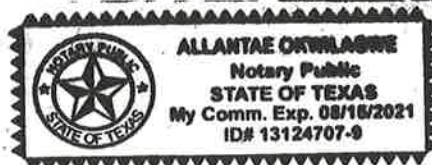
Respectfully,


Donald E. Hill¹⁰

Dallas, TX 75218

Signed and sworn to before me on the 6th day of February 2020.


Notary Public



⁸ *Id.*

⁹ See 52 USC §30114(b)(1) and related laws and regulations.

¹⁰ I am a resident/voter of Texas's CD-5 and a candidate in the 2020 Republican Party Primary for Texas's CD-5. During the campaign, I have been made aware by multiple voters of alleged irregularities in the Committee filings, particularly regarding multiple large expense reimbursements. I have heard from voters from Texas's CD-5 comments like "Please check [Gooden's] FEC's" and "Be sure to do your research on [Gooden's] finances" and voters have referenced certain examples of suspect transactions. I promised voters I would look into the matters they raised and this Complaint is the result of my review of the public filings and data.

EXHIBIT A

This data has been categorized and coded by the FEC. The FEC's multi-step process can take days (for electronic filings) or weeks (for paper filings).

Edit filters

SPENDER NAME OR ID

LANCE GOODEN FOR CONGRESS COMMITTEE (C00662601)

RECIPIENT NAME OR ID

GOODEN, LANCE

REPORT TIME PERIOD ⓘ

2019-2020

More ▾

DISBURSEMENT DATE RANGE

Beginning - Ending ▶

Recipient details +

Disbursement details +

Spender committee type +

Spender	Recipient	State	Description	Disbursement date	Amount
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	09/30/2019	\$5,492.18
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	09/27/2019	\$6,000.00
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	08/27/2019	\$9,700.00
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	08/19/2019	\$5,000.00
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	07/25/2019	\$8,000.00
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	06/30/2019	\$9,436.54
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	06/27/2019	\$10,400.00
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	05/28/2019	\$7,800.00
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	05/24/2019	\$6,500.00
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	04/29/2019	\$6,367.54
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	03/31/2019	\$3,104.75
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	03/27/2019	\$5,573.77
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	02/27/2019	\$10,139.58
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	01/28/2019	\$2,650.64
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	TRAVEL EXPENSE REIMBURSEMENT	01/22/2019	\$421.40
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	01/22/2019	\$4,277.48
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN, LANCE	TX	EXPENSE REIMBURSEMENT	01/07/2019	\$3,459.39

Results per page: 30 ▾

\$103,901.87

Showing 1 to 17 of 17 entries

EXHIBIT B

Object data type

Disbursements

Export

Viewing 18 filtered results for:

Clear all filters

Raw

Not yet been categorized and coded
collected directly from a committee's
reports. It doesn't include paper

Data type: raw

LANCE GOODEN FOR CONGRESS COMMITTEE (C00662601) x

"Reimbursement" x

Filters(2)

NAME OR ID

LANCE GOODEN FOR CONGRESS COMMITTEE (C00662601)



"Reimbursement"



Spender	Recipient	State	Description	Disbursement date	Amount
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN	TX	Expense Reimbursement	12/31/2019	\$7,000.00
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN	TX	Expense Reimbursement	12/16/2019	\$5,500.00
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN	TX	Expense Reimbursement	11/25/2019	\$5,500.00
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN	TX	Expense Reimbursement	11/20/2019	\$5,000.00
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN	TX	Expense Reimbursement	11/06/2019	\$5,300.00
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN	TX	Expense Reimbursement	10/25/2019	\$3,500.00
LANCE GOODEN FOR CONGRESS COMMITTEE	GOODEN	TX	Expense Reimbursement	10/21/2019	\$5,558.82
LANCE GOODEN FOR CONGRESS COMMITTEE	McCain	TX	Campaign Staff and Expense Reimbursement - No large subvendors	10/06/2019	\$4,818.11

Q4

\$37,558.82



Feedback

EXHIBIT C

Home > Campaign finance data > Browse data > Disbursements

Disbursements

Disbursements

Viewing 0 filtered results for: [Clear all filters X](#)

or
 or

-

Viewing 0 filtered results for: [Clear all filters X](#)

-

or

or

Spender

Recipient

No data available in table

Results per page:

Results per page:



Showing 0 to 0 of 0 entries

EXHIBIT D

Browser address bar: https://www.fiscaltransparency.gov/.../house-of-representatives/operating-expenses/...

This data has been generated and verified by the FEC. The FEC maintains records for late fees. For website, click on item for more info.

Edit filters (36)

SPENDER NAME OR ID:

RECIPIENT NAME OR ID:

- "house of"
- "green, veronica"
- "green, r"
- "conway, stacy"
- "garcia, sylva"
- "michael, michael"
- "cristina, ben"
- "jackson, shelia lee"
- "green, veronica"
- "cuelar, henry"
- "dy, elijah"
- "brady, kevin"
- "alited, colin"
- "michael, michael"
- "weber, randy"
- "taylor, van"
- "maxham, kenny"
- "carter, jason"

Data type: processed

THOMAS, WALTER | GREEN, VERONICA | CONWAY, STACY | GARCIA, SYLVA | GARCIA, SYLVA | FORMAN, BEN | JACKSON, SHELIA LEE | SPERMETT, LOU | REEDER, VERONICA | ...

Spender	Recipient	State	Description	Disbursement Date	Amount
ROGER WILLIAMS FOR U.S. CONGRESS, COMMITTEE	WILLIAMS, ROGER	TX	REIMBURSEMENT - TRANSPORTATION (SEE BELOW IF ITEMIZED)	09/22/2019	\$ 145.80
TEXANS FOR HENRY CUELLAR CONGRESSIONAL CAMPAIGN	CUELLAR, HENRY	TX	MILEAGE REIMBURSEMENT	08/24/2019	\$ 720.00
VERONICA ECOBAR FOR CONGRESS	ECOBAR, VERONICA	TX	CATERING REIMBURSEMENT (SEE BELOW IF ITEMIZED)	08/01/2019	\$ 102.20
JACHEL BURGESS FOR CONGRESS	BURGESS, MICHAEL C	TX	MILEAGE REIMBURSEMENT	04/24/2019	\$ 203.76
ROGER WILLIAMS FOR U.S. CONGRESS, COMMITTEE	WILLIAMS, ROGER	TX	REIMBURSEMENT - MEALS (SEE BELOW IF ITEMIZED)	01/21/2019	\$ 148.83
SYLVA GARCIA FOR CONGRESS	GARCIA, SYLVA	TX	REIMBURSEMENT - SEE BELOW FOR ITEMS	05/14/2018	\$ 622.44
SYLVA GARCIA FOR CONGRESS	GARCIA, SYLVA	TX	REIMBURSEMENT - SEE BELOW FOR ITEMS	05/07/2019	\$ 1,733.84
MICHAEL BURGESS FOR CONGRESS	BURGESS, MICHAEL C	TX	MILEAGE REIMBURSEMENT	04/09/2018	\$ 770.04
SYLVA GARCIA FOR CONGRESS	GARCIA, SYLVA	TX	REIMBURSEMENT (SEE BELOW)	02/20/2018	\$ 912.91
SYLVA GARCIA FOR CONGRESS	GARCIA, SYLVA	TX	REIMBURSEMENT (SEE BELOW)	03/27/2018	\$ 878.10
TEXANS FOR HENRY CUELLAR CONGRESSIONAL CAMPAIGN	CUELLAR, HENRY	TX	MILEAGE REIMBURSEMENT	02/15/2018	\$ 550.00
ROGER WILLIAMS FOR U.S. CONGRESS, COMMITTEE	WILLIAMS, ROGER	TX	REIMBURSEMENT - TRANSPORTATION (SEE BELOW IF ITEMIZED)	02/20/2018	\$ 420.00
ROGER WILLIAMS FOR U.S. CONGRESS, COMMITTEE	WILLIAMS, ROGER	TX	REIMBURSEMENT - LIQUID & INSERTS (SEE BELOW IF ITEMIZED)	01/28/2018	\$ 109.20

RESULTS 24/300 30

Displaying 1 to 13 of 13 entries

EXHIBIT E



[Home](#) › [Campaign finance data](#) › [Committee profiles](#) › [LANCE GOODEN FOR CONGRESS COMMITTEE](#)

LANCE GOODEN FOR CONGRESS COMMITTEE

HOUSE

ID: C00662601

Financial summary

TWO-YEAR PERIOD

2019-2020 ▼

Total raised
 Browse receipts

Coverage dates: 01/01/2019 to 12/31/2019

TOTAL RECEIPTS	\$944,852.77
TOTAL CONTRIBUTIONS	\$942,626.77
Total individual contributions	\$446,326.77
<i>Itemized individual contributions</i>	<u>\$438,627.77</u>
<i>Unitemized individual contributions</i>	\$7,699.00
Party committee contributions	<u>\$0.00</u>
Other committee contributions	<u>\$496,300.00</u>
Candidate contributions	<u>\$0.00</u>
TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	<u>\$0.00</u>
TOTAL LOANS RECEIVED	\$0.00
Loans made by candidate	<u>\$0.00</u>
Other loans	<u>\$0.00</u>
OFFSETS TO OPERATING EXPENDITURES	<u>\$0.00</u>
OTHER RECEIPTS	<u>\$2,226.00</u>

Newly filed summary data may not appear for up to 48 hours.

Total spent
 Browse disbursements

Coverage dates: 01/01/2019 to 12/31/2019

TOTAL DISBURSEMENTS	\$477,399.54
OPERATING EXPENDITURES	\$477,399.54
TRANSFERS TO OTHER AUTHORIZED COMMITTEES	\$0.00
TOTAL CONTRIBUTION REFUNDS	\$0.00
Individual refunds	\$0.00
Political party refunds	\$0.00
Other committee refunds	\$0.00
TOTAL LOAN REPAYMENTS	\$0.00
Candidate loan repayments	\$0.00
Other loan repayments	\$0.00
OTHER DISBURSEMENTS	\$0.00

Newly filed summary data may not appear for up to 48 hours.

Cash summary

Coverage dates: 01/01/2019 to 12/31/2019

BEGINNING CASH ON HAND	\$154,190.26
ENDING CASH ON HAND	\$621,643.49
DEBTS/LOANS OWED TO COMMITTEE	\$0.00
DEBTS/LOANS OWED BY COMMITTEE	\$19,208.63

Newly filed summary data may not appear for up to 48 hours.