CREW | citizens for responsibility and ethics in washington

MOST CORRUPT: REPRESENTATIVE DAVID RIVERA

Representative David Rivera (R-FL) is a first term member of Congress, representing Florida's 25th congressional district. He was a Florida state representative from 2002 until his election to Congress in 2010. His ethics issues stem from what appear to be multiple money laundering and tax evasion schemes involving: (1) his role in a pro-slots campaign; (2) repeatedly misreporting his income and liabilities on personal financial disclosure forms; (3) using campaign funds for personal benefit and to steer money to family and friends; and (4) his personal and professional ties to an ex-lobbyist and her consulting company.

Rep. Rivera is under criminal investigation by the Federal Bureau of Investigation (FBI), the Internal Revenue Service (IRS), the Florida Department of Law Enforcement, the Miami-Dade Police public corruption unit, and the Miami-Dade State Attorney's office.[1] It is unclear which entity has jurisdiction over specific pieces of the larger criminal probe, and the status of each investigation is unknown.[2]

Millennium Marketing

Millennium Marketing, Inc. is a consulting firm that sits at the center of the investigations into Rep. Rivera's personal and campaign finances. The company was founded as Millennium Marketing Strategies, Inc. in 2000 by Rep. Rivera's mother, Daisy Magarino, but according to state incorporation records it dissolved the following year.[3] Nevertheless, Rep. Rivera included income from Millennium Marketing on his state financial disclosure forms between 2002 and 2005.[4] In 2006, records show Rep. Rivera's godmother, Ileana Medina, created Millennium Marketing, Inc. and Ms. Magarino has been listed on state records as a company vice president since 2008.[5]

---

[1] Michael Putney, Murky Finances Limit Rivera's Effectiveness, *Miami Herald*, May 3, 2011; Scott Hiaasen and Marc Caputo, Feds Investigate Congressman David Rivera on Casino Contract, *Miami Herald*, July 21, 2011.
[2] *Id.*
[3] Millennium Marketing Strategies, Inc., Articles of Incorporation, Secretary of State: Tallahassee, Florida, filed October 31, 2000, *available at* www.sunbiz.org; Scott Hiaasen and Patricia Mazzei, A $500,000 Question Over Track's Payments, *Miami Herald*, December 16, 2010; Millennium Marketing Strategies, Inc., Detail By Entity Name, Secretary of State: Tallahassee, Florida, filed September 21, 2001, *available at* www.sunbiz.org.
[4] State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2002, filed September 4, 2002; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2003, filed July 12, 2004; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2004, filed July 1, 2005; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2005, filed July 17, 2006.
[5] Millennium Marketing Inc., Articles of Incorporation, Secretary of State: Tallahassee, Florida, filed September 25, 2006, *available at* www.sunbiz.org; Millennium Marketing Inc., Annual Report for Calendar Year 2008, Secretary

Flagler Dog Track Deal and Payments

Both state and federal officials are investigating more than $500,000 in payments made by the Flagler Dog Track, now known as Magic City Casino, to Millennium Marketing.[6] In addition, the FBI and the IRS are looking into a previously undisclosed $1 million consulting deal between the track and Millennium Marketing.[7] It appears the IRS is considering whether Rep. Rivera has engaged in income tax evasion.[8]

In October 2006, one month after Millennium Marketing was reincorporated, the firm was hired by Flagler Dog Track to run a campaign aimed at winning approval for Las Vegas style slot machines via a voter referendum.[9] At the time, slot machines were a delicate political issue.[10] Outgoing Gov. Jeb Bush (R) and then-state House Speaker Marco Rubio (R), who went on to win a U.S. Senate seat in 2010, both opposed allowing slot machines.[11] Nevertheless, voters approved the measure in January 2008.[12]

Rep. Rivera initially denied working for the dog track, but later released a statement acknowledging his role.[13] A lawyer for the dog track said it was Rep. Rivera who had first approached the track and asked to manage the campaign.[14] Rep. Rivera also requested any payments be made through Millennium Marketing instead of directly to him.[15]

According to a contract signed by both Ms. Medina and Rep. Rivera, Rep. Rivera was the "strategic director" of the pro-slots campaign and its "Top Leader of Chain of Command of All Campaign Consultants and Campaign Activities," despite not being listed as an officer with Millennium Marketing.[16] He promised to spend 75% of his time managing the campaign.[17] Rep. Rivera's duties included not only garnering support for the bill with unions and city leaders, but also "identification and neutralization of opposition," including animal rights groups, competing gambling operations, and the Latino community.[18]

of State: Tallahassee, Florida, filed April 4, 2008, *available at* www.sunbiz.org; Hiaasen and Mazzei, *Miami Herald*, Dec. 16, 2010.

[6] Hiaasen and Caputo, *Miami Herald*, July 21, 2011.

[7] *Id*.

[8] *Id*.

[9] Hiaasen and Mazzei, *Miami Herald*, Dec. 16, 2010; Millennium Marketing Inc., Articles of Incorporation, Secretary of State: Tallahassee, Florida, filed September 25, 2006, *available at* www.sunbiz.org.

[10] *Id*.

[11] *Id.*

[12] Hiaasen and Caputo, *Miami Herald*, July 21, 2011.

[13] *Id.*

[14] *Id.*

[15] Hiaasen and Mazzei, *Miami Herald*, Dec. 16, 2010.

[16] *Id.*; Millennium Marketing Inc., Articles of Incorporation, Secretary of State: Tallahassee, Florida, filed September 25, 2006, *available at* www.sunbiz.org.

[17] *Id.*

[18] *Id.*

Flagler Dog Track initially paid Millennium Marketing $50,000 in 2006, and then another $460,000 after the initiative passed in January 2008.[19] Millennium Marketing's contract also called for a $500,000 "success fee," which the firm reportedly has requested.[20] Rep. Rivera did not report any income from the campaign on his state financial disclosure forms.[21]

Millennium Marketing Loans

Rep. Rivera failed to disclose $132,000 in loans from Millennium Marketing on state and federal financial disclosure forms covering the period from 2007 to 2010,[22] although he admitted to the *Associated Press* he had received four loan payments totaling that amount.[23] Following press reports, Rep. Rivera amended his federal and state financial disclosure forms to reflect the loans.[24] The amended forms indicate the loans were made during the period Rep. Rivera worked on the pro-slots campaign.[25]

U.S. Agency for International Development Consulting and Income

During his tenure as a state representative, Rep. Rivera repeatedly claimed his main source of income outside his work for the legislature came from consulting for the U.S. Agency for International Development (USAID).[26] Although required by state law to include payments he received from outside employers on his personal financial disclosure forms, Rep. Rivera routinely listed the agency as a source of income without revealing how much money he had

[19] Hiaasen and Mazzei, *Miami Herald*, Dec. 16, 2010; Amy Driscoll, New Miami-Dade Slots Still Months Away, *Miami Herald*, February 10, 2008.
[20] Hiaasen and Caputo, *Miami Herald*, July 21, 2011.
[21] State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2006, filed August 20, 2007; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2007, filed June 17, 2008; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2008, filed July 8, 2009.
[22] State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2007, filed June 17, 2008; State Rep. David Rivera, Amendment to Full and Public Disclosure of Financial Interests for Calendar Year 2007, filed January 4, 2011; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2008, filed July 8, 2009; State Rep. David Rivera, Amendment to Full and Public Disclosure of Financial Interests for Calendar Year 2008, filed January 4, 2011; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2009, filed June 18, 2010; State Rep. David Rivera, Amendment to Full and Public Disclosure of Financial Interests for Calendar Year 2009, filed January 4, 2011; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2010, filed March 25, 2011.
[23] Scott Hiaasen, U.S. Rep.-elect David Rivera Discloses $137,000 Loan He Received From Mother's Company, *Miami Herald*, January 3, 2011. While it was originally reported that Rep. Rivera had failed to disclose $137,000 in loans, Rep. Rivera later corrected the figure, without explanation, to $132,000. *See* Curt Anderson, New Fla. Congressman Quietly Reported Loans in Dec., *Associated Press*, January 4, 2011.
[24] Anderson, *Associated Press*, Jan. 4, 2011; Rep. David Rivera, Amendment to Candidate Personal Financial Disclosure Statement for 2009-2010, filed December 16, 2010; State Rep. David Rivera, Amendment to Personal Financial Disclosure Statement for Calendar Year 2009, filed January 4, 2011; State Rep. David Rivera, Amendment to Full and Public Disclosure of Financial Interests for Calendar Year 2008, filed January 4, 2011; State Rep. David Rivera, Amendment to Full and Public Disclosure of Financial Interests for Calendar Year 2007, filed January 4, 2011.
[25] Hiaasen, *Miami Herald*, Jan. 3, 2011.
[26] Scott Hiaasen and Patricia Mazzei, Source of Rivera's Income Unclear, *Miami Herald*, October 13, 2010.

been paid.[27] Checking with USAID, the *Miami Herald* discovered the agency had no record of Rep. Rivera or his consulting company, InterAmerican Government Relations, ever working for the agency.[28] Rep. Rivera then claimed he worked as a subcontractor, something not generally tracked by USAID,[29] but declined to provide details about his work for the agency.[30]

Nevertheless, Rep. Rivera provided the *Herald* with records of three trips during which he claimed he did development work in Mexico and Chile in 2005 and 2008.[31] The *Herald* found that in fact, Rep. Rivera had traveled to Mexico and Chile as a guest of the U.S. State Department under its International Information Program, which sends American politicians and academics overseas to give speeches and attend conferences.[32] A State Department spokesperson said Rep. Rivera had traveled as a private citizen, not as a contractor or consultant to the U.S. government.[33] Confronted with this evidence, Rep. Rivera's spokesperson claimed the travel records illustrated the type of work he had performed, not proof of his work on behalf of USAID.[34] Soon thereafter, Rep. Rivera amended his state financial disclosure forms to remove any references to income other than his state legislative salary.[35]

[27] Scott Hiaasen and Patricia Mazzei, Agency Disappears from David Rivera's Forms, *Miami Herald*, October 19, 2010; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2007, filed June 17, 2008; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2008, filed July 8, 2009; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2009, filed June 18, 2010; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2006, filed August 20, 2007; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2005, filed July 17, 2006; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2004, filed July 1, 2005; State Rep. David Rivera, Full and Public Disclosure of Financial Interests for Calendar Year 2003, filed July 12, 2004.

[28] Laura Wides-Munoz, Republican Candidate David Rivera Questioned Over Income, *Associated Press*, October 27, 2010; Hiaasen and Mazzei, *Miami Herald*, Oct. 13, 2010.
[29] Hiaasen and Mazzei, *Miami Herald*, Oct. 19, 2010.
[30] Wides-Munoz, *Associated Press*, Oct. 27, 2010.
[31] Hiaasen and Mazzei, *Miami Herald*, Oct. 13, 2010.
[32] *Id.*
[33] *Id*.
[34] *Id*.
[35] Hiaasen and Mazzei, *Miami Herald*, Oct. 13, 2010; State Rep. David Rivera, Amendment to Full and Public Disclosure of Financial Interests for Calendar Year 2003, filed October 15, 2010; State Rep. David Rivera, Amendment to Full and Public Disclosure of Financial Interests for Calendar Year 2004, filed October 15, 2010; State Rep. David Rivera, Amendment to Full and Public Disclosure of Financial Interests for Calendar Year 2005, filed October 15, 2010; State Rep. David Rivera, Amendment to Full and Public Disclosure of Financial Interests for Calendar Year 2006, filed October 15, 2010; State Rep. David Rivera, Amendment to Full and Public Disclosure of Financial Interests for Calendar Year 2007, filed October 15, 2010; State Rep. David Rivera, Amendment to Full and Public Disclosure of Financial Interests for Calendar Year 2008, filed October 15, 2010; State Rep. David Rivera, Amendment to Full and Public Disclosure of Financial Interests for Calendar Year 2009, filed October 15, 2010.

Campaign Spending and Reimbursements

Investigators are also looking into Rep. Rivera's campaigns' payments to Millennium Marketing and ACH Fundraising Strategies, as well as payments the campaigns made to reimburse the candidate.[36]

On September 27, 2006, two days after the company was reincorporated, Rep. Rivera's campaign for state representative paid Millennium Marketing $15,000 for campaign consulting.[37] Once Rep. Rivera won re-election, his campaign paid Millennium Marketing an additional $15,000 for coordinating a "thank you campaign."[38]

Furthermore, a few months after dropping out of a state Senate race in early 2010, but once he had started his congressional campaign, Rep. Rivera's state campaign paid the now defunct ACH Fundraising Strategies $75,000 categorized as "thank you" expenses: $50,000 on July 15, 2010, a day before the company was officially incorporated, and $25,000 on August 30, 2010.[39] ACH, which dissolved a few months later, on December 23, 2010, was owned by Alyn Cruz Higgins, the daughter of Rep. Rivera's congressional aide and former state legislative aide, Alina Garcia.[40] Ms. Higgins' lawyer said her company had provided consulting services to Rep. Rivera's campaign.[41]

The *Associated Press* reported that over the eight years Rep. Rivera was a state legislator, acting as his own campaign treasurer, he reimbursed himself over $160,000 – more than any other Florida representative.[42] Furthermore, he failed to provide explanations, as required by state law, for about $60,000 of those payments.[43]

Relationship with Esther Nuhfer and Communication Solutions

State investigators are looking into a potential kickback scheme Rep. Rivera may have had with former Tallahassee lobbyist Esther Nuhfer,[44] whom Rep. Rivera has described as a fundraising consultant and a close friend.[45] Ms. Nuhfer lobbied the state House of Representatives while Rep. Rivera was a member, and according to newspaper reports, she

[36] Hiaasen and Mazzei, *Miami Herald*, Dec. 16, 2010; Scott Hiaasen and Patricia Mazzei, Investigators Look into Rep. Rivera's 'Thank You' Spending, *Miami Herald*, January 15, 2011; Kyle Munzenrieder, Rep. David Rivera Paid Himself $60,000 in Unexplained Campaign Reimbursements, *Miami New Times*, January 28, 2011.
[37] Florida Department of State Division of Elections, Candidate Search: "Rivera, David," List of Expenditures, 2006 General Election, *available at* http://doe.dos.state.fl.us/campaign-finance/expend.asp; Hiaasen and Mazzei, *Miami Herald*, Dec. 16, 2010.
[38] Florida Department of State Division of Elections, Candidate Search: "Rivera, David," List of Expenditures, 2006 General Election, *available at* http://doe.dos.state.fl.us/campaign-finance/expend.asp.
[39] Hiaasen and Mazzei, *Miami Herald*, Jan. 15, 2011.
[40] *Id.*
[41] *Id.*
[42] Munzenrieder, *Miami New Times*, Jan. 28, 2011.
[43] *Id.*
[44] Scott Hiaasen and Patricia Mazzei, Miami-Dade Republican Party Can't Show What it got for $150,000 Paid to David Rivera's Close Ally, *Miami Herald*, February 5, 2011.
[45] Scott Hiaasen, Patricia Mazzei and Scott Caputo, Rep. Rivera's Fundraising Consultant Collected $817,000 in Fees Since 2006, *Miami Herald*, February 19, 2011.

frequently worked from Rep. Rivera's office.[46] Ms. Nuhfer is no longer a registered lobbyist in Florida and has been seen in Rep. Rivera's Washington office.[47]

Political campaigns and committees tied to Rep. Rivera have paid Ms. Nuhfer's consulting firm, Communication Solutions, at least $817,000 since 2006.[48] The total includes $196,483 in payments from Rep. Rivera's 2010 congressional campaign and a $150,000 bonus for work on his abandoned state Senate campaign.[49]

Rep. Rivera chaired the Miami-Dade GOP from December 2008 to December 2010.[50] In October and November 2010, the Miami-Dade GOP paid Ms. Nuhfer's firm $150,000, for radio advertising and get-out-the-vote efforts.[51] Though Rep. Rivera was chairman when the payments were made, his campaign claimed he had recused himself from day-to-day business and decision making after winning the Republican primary for his House seat in August 2010 and that the party's board chose Communication Solutions after his recusal.[52] In reality, board minutes reveal Rep. Rivera did not recuse himself until September 4, 2010, and that the board agreed to select vendors before that at its August 21, 2010 meeting, without selecting a specific firm.[53] Therefore, it appears Rep. Rivera was involved in the decision, but exactly how Ms. Nuhfer's firm was chosen remains unknown.

The Communication Solutions payments were the Miami-Dade GOP's largest expense to a consultant in at least six years.[54] The party was unable to account for how much of the money was spent.[55] The Miami-Dade GOP did not have a written contract with Communication Solutions, and officials said they did not receive detailed invoices or records from the firm.[56]

In addition, the FBI has interviewed Ms. Nuhfer as part of its probe into the Flagler Dog Track contract.[57]

Potential Violations

Money Laundering and Tax Evasion

Federal law prohibits anyone from engaging in financial transactions that involve the proceeds of unlawful activity with the intent to avoid paying taxes, to conceal or disguise the

[46] *Id.*
[47] *Id.*
[48] *Id.*
[49] Hiaasen and Mazzei, *Miami Herald*, Feb. 19, 2011; http://www.opensecrets.org/politicians/expendetail.php?cid=N00031887&cycle=2010&name=Communication%20Solutions.
[50] Patricia Mazzei, Dade GOP to Select New Leader, *Miami Herald*, December 16, 2010.
[51] Hiaasen and Mazzei, *Miami Herald*, Feb. 5, 2011.
[52] *Id.*
[53] *Id.*
[54] *Id.*
[55] Hiaasen and Mazzei, *Miami Herald*, Feb. 5, 2011.
[56] *Id.*
[57] Hiaasen and Caputo, *Miami Herald*, July 21, 2011.

nature, source or location of those proceeds, or to avoid a federal or state transaction reporting requirement.[58] Similarly, it is a crime to attempt to avoid or defeat paying taxes.[59]

If Rep. Rivera engaged in any financial transactions involving the Flagler Dog Track or Millennium Marketing with the goal of concealing money he received illegally, or if he concealed payments he received in an effort to avoid paying taxes, he may have engaged in money laundering and tax evasion.

False Statements on Personal Financial Disclosure Forms

The Ethics in Government Act of 1967 requires all members of Congress to file financial disclosure reports.[60] Under the statute, the attorney general may seek a civil penalty of up to $11,000 against any individual who knowingly and willfully falsifies or fails to file or report any information required by the Act.[61] House Rule 26 incorporates the financial disclosure provisions of the Ethics in Government Act.[62]

Federal law further prohibits members of Congress from making "any materially false, fictitious, or fraudulent statement or representation"[63] on "a document required by law, rule, or regulation to be submitted to the Congress or any office or officer within the legislative branch."[64]

If Rep. Rivera failed to disclose or misrepresented his income or the true value of his personal assets on his federal financial disclosure forms, he may have violated the Ethics in Government Act and 18 U.S.C. § 1001.

Similarly, if Rep. Rivera failed to disclose or misrepresented his income on his state financial disclosure forms while he was a member of the Florida legislature, he may be subject to public censure, reprimand, and civil penalties.[65]

Misuse of Campaign Funds

State and federal authorities appear to be investigating whether Rep. Rivera converted state and federal campaign contributions to his personal use.

Under Florida law, reimbursements to a candidate or any other individual for expenses incurred in connection with the campaign by a check drawn upon the campaign account must be reported.[66] The full name and address of each person to whom the candidate or other individual

[58] 18 U.S.C. § 1956(a)(1).
[59] 26 U.S.C. § 7201.
[60] Pub. L. No. 95-521, 92 Stat. 1824 (Oct. 26, 1978).
[61] 5 U.S.C. app. 4, § 104.
[62] House Comm. on Standards of Official Conduct, House Ethics Manual, p. 248 (110th Cong., 2d Sess., 2008 ed.).
[63] 18 U.S.C. § 1001(a)(2).
[64] 18 U.S.C. § 1001(c)(2).
[65] Fla. Stat. § 112.317 (2011).
[66] Fla. Stat. § 106.07(4) (2011).

made payment for which reimbursement was made by check drawn upon the campaign account must be reported, together with the purpose of such payment.[67]

As the treasurer of his own state campaign committee, Rep. Rivera signed his campaign finance reports, which failed to include explanations for $60,000 in reimbursements. By willfully certifying the correctness of reports he knew to be incorrect, false, or incomplete, Rep. Rivera appears to have violated Florida criminal law.[68]

Campaign Expenditures

Under Florida law, campaign reports must list the full name and address of each person to whom an expenditure for personal services, salary or reimbursed authorized expenses was made along with the amount, date, and clear purpose of the expenditure.[69]

Rep. Rivera's campaign's check to Millennium Marketing for $15,000 and two checks to ACH Fundraising totaling $75,000, categorized as "thank you" expenses do not appear to clearly state the purposes of those expenditures. By willfully certifying the correctness of reports he knew to be incomplete, Rep. Rivera appears to have violated Florida criminal law.[70]

Conversion, False Statements on Financial Disclosure Forms, and Tax Evasion

Federal law prohibits federal candidates from using campaign funds for personal use.[71] If Rep. Rivera received any of the $196,483 his campaign committee paid to Ms. Nuhfer's consulting firm, Communication Solutions, he may have illegally converted his campaign funds to his personal use.

If Rep. Rivera received any of the $196,483 his federal campaign committee paid to Communication Solutions, because he failed to include that income on his personal financial disclosure forms, he may have violated 18 U.S.C. § 1001.

Finally, if Rep. Rivera received any of the $196,483 his federal campaign committee paid to Communication Solutions, or if he received any of the money his state campaign committees paid the firm, but failed to include those payments on his U.S. Individual Tax Return, Form 1040s, he may have violated 26 U.S.C. § 7201.

Conduct Not Reflecting Creditably on the House

House Rule 23 requires all members of the House to conduct themselves "at all times in a manner that reflects creditably on the House."[72] This ethics standard is considered to be "the most comprehensive provision" of the code.[73] When this section was first adopted, the Select

[67] *Id.*
[68] Fla. Stat. §§ 106.07(5), 106.19 (2011).
[69] Fla. Stat. § 106.07 (2011).
[70] Fla. Stat. §§ 106.07(5), 106.19 (2011).
[71] 2 U.S.C. §§ 439a(b), 437g(d)(1)(A)(i).
[72] Rule 23, cl. 1.
[73] House Ethics Manual, p. 12.

Committee on Standards of Official Conduct of the 90th Congress noted 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.[74] This rule has been relied on by the committee in numerous prior cases in which the committee found unethical conduct including: the failure to report campaign contributions,[75] making false statements to the committee,[76] criminal convictions for bribery,[77] or accepting illegal gratuities,[78] and accepting gifts from persons with interest in legislation in violation of the gift rule.[79]

If Rep. Rivera converted campaign funds to his personal use, committed tax evasion, or lied on his personal financial disclosure forms, he acted in a manner that brings discredit to the House.

[74] 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).
[75] 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).
[76] 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 (Counts 3-4).
[77] House Comm. on Standards of Official Conduct, *In the Matter of Representative Michael J. Myers*, H. Rep. No. 96-1387, 96th Cong., 2d Sess. 2, 5 (1980); *see* 126 Cong. Rec. 28953-78 (Oct. 2, 1980) (debate and vote of expulsion); *In the Matter of Representative John W. Jenrette, Jr.*, H. Rep. No. 96-1537, 96th Cong., 2d Sess. 4 (1980) (member resigned); *In the Matter of Representative Raymond F. Lederer*, H. Rep. No. 97-110, 97th Cong., 1st Sess. 4, 16-17 (1981) (member resigned after Committee recommended expulsion). In another case, the Committee issued a Statement of Alleged Violation concerning bribery and perjury, but took no further action when the member resigned (*In the Matter of Representative Daniel J. Flood*, H. Rep. No. 96-856, 96th Cong., 2d Sess. 4-16, 125-126 (1980)).
[78] 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).
[79] House Comm. on Standards of Official Conduct, *In the Matter of Representative Charles H. Wilson (of California)*, H. Rep. No. 96-930, 96th Cong. 2d Sess. 4-5 (1980); *see* 126 Cong. Rec. 13801-20 (June 10, 1980) (debate and vote of censure).