September 7, 2016

Office of Congressional Ethics
House of Representatives
425 3rd Street, S.W.
Suite 1110
Washington, D.C. 20024
Sent via electronic mail

The Honorable Charles W. Dent
Chairman, Committee on Ethics
House of Representatives
1015 Longworth House Office Building
Washington, D.C. 20515
Sent via electronic mail

Dear Sirs:

This correspondence shall serve as an official complaint against Del. Stacey Plaskett, the member of Congress from the United States Virgin Islands, and a formal request for an investigation to determine if her wanton use of official, taxpayer-funded congressional resources for partisan political purposes constitutes a violation of the well-established ethical rules of the House of Representatives.

Upon returning to work September 6, 2016, after the congressional recess, Mrs. Plaskett sent an email newsletter during congressional office hours (at approximately 1 p.m.) attacking the
Republican nominee for Congress.\footnote{The newsletter is accessible at http://campaign.r20.constantcontact.com/render?m=1117863363781&ca=22e60983-6d0b-4634-b169-d4652a3324c4.} While her campaign committee transmitted the email newsletter, there is no practical wall of separation between Mrs. Plaskett’s official congressional office and campaign committee, as evidenced by subsequent allegations in this complaint. It remains unclear if the email newsletter was (1) prepared and/or transmitted using official congressional resources or (2) prepared and/or transmitted on official congressional property. Additionally, the email newsletter linked to Mrs. Plaskett’s official congressional office Twitter channel.\footnote{Mrs. Plaskett’s official congressional office Twitter account under the username of “@StaceyPlaskett” is accessible at http://twitter.com/StaceyPlaskett.} \footnote{In addition to the email newsletter of September 6, 2016, Mrs. Plaskett extensively uses her official congressional office Twitter account on the website of her campaign committee. The campaign committee website is accessible at http://plaskettforcongress.com/.}

Mrs. Plaskett’s official congressional office press secretary, Richard Motta, also engaged in partisan political activity in the days before the Virgin Islands territorial primary election on August 6, 2016. Specifically, Mr. Motta, quoted as Mrs. Plaskett’s press secretary, attacked not only the Republican nominee for Congress, but also Mrs. Plaskett’s opponent for the Democratic congressional nomination.\footnote{Bill Kossler, “Ackley Enters FEC Melee in Delegate Race,” St. Croix Source, August 3, 2016, accessed September 7, 2016, http://stcroixsource.com/content/news/local-news/2016/08/03/ackley-enters-fec-mele-delegate-race.}

According to Mr. Motta’s resume, as posted on LinkedIn, he has worked continuously as Mrs. Plaskett’s communications director and press secretary since January 2015.\footnote{Mr. Motta’s resume on LinkedIn is accessible at https://www.linkedin.com/in/rwmotta.} One of Mr. Motta’s listed job duties is to write Mrs. Plaskett’s newsletters. It is unclear if Mr. Motta drafted the aforementioned email newsletter at Mrs. Plaskett’s direction.

It has also been discovered that Mr. Motta edited Mrs. Plaskett’s entry on Wikipedia, an online crowd-sourced encyclopedia, on at least four separate occasions (twice on February 12, 2016, once on March 6, 2015, and once on February 25, 2015).\footnote{The revision history of Wikipedia is accessible at https://en.wikipedia.org/w/index.php?title=Stacey_Plaskett&action=history.}
On July 21, 2016, Mrs. Plaskett used her official congressional office to respond to the release of a sexually-themed photograph that Mrs. Plaskett admits she transmitted via SMS messaging. Mrs. Plaskett used her official congressional office to respond to what she called a “personal” and “private” matter. If, as she said, it was a “personal” and “private” matter then Mrs. Plaskett’s response should have came from either her campaign committee or herself personally—not the official congressional office. Moreover, it is unclear if a cellular telephone or other device belonging to the official congressional office was used by Mrs. Plaskett to capture, store or transmit either this photograph or any other sexually-themed photographs.

The existence of this sexually-themed photograph also raises serious questions over whether Mrs. Plaskett conducted herself “at all times in a manner that shall reflect creditably on the House,” as required by the well-established ethical rules of the House of Representatives.

Mrs. Plaskett has also used press releases prepared and transmitted at taxpayer expense by her official congressional office for partisan political activity. Additionally, Mrs. Plaskett’s biography as prepared by her official congressional office is also being used for partisan political activity.

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Using official congressional office resources to engage in partisan political activity is a gross violation of the trust bestowed upon Mrs. Plaskett by Americans in the United States Virgin Islands. Moreover, defending the transmission of a sexually-themed photograph—to say nothing of capturing, storing or transmitting such a photograph on official devices—does not constitute working on the people’s business.

It is imperative that an investigation be initiated to not only determine the full extent of Mrs. Plaskett’s wanton use of official, taxpayer-funded congressional resources, but also whether Mrs. Plaskett’s conduct reflected creditably on the House of Representatives. If Mrs. Plaskett is found in violation, she should be sanctioned accordingly.

Yours most respectfully,

John Canegata  
Chairman  
Republican Party of the U.S. Virgin Islands