



# U.S. House of Representatives COMMITTEE ON ETHICS

## EMPLOYEE POST-TRAVEL DISCLOSURE FORM Original Amendment

This form is for disclosing the receipt of travel expenses from private sources for travel taken in connection with official duties. This form does not eliminate the need to report privately-funded travel on the annual *Financial Disclosure Statements* of those employees required to file them. In accordance with House Rule 25, clause 5, **you must complete this form and file it with the Clerk of the House, by email at [gifttravelreports@mail.house.gov](mailto:gifttravelreports@mail.house.gov), within 15 days after travel is completed.** Please **do not** file this form with the Committee on Ethics.

**NOTE: Willful or knowing misrepresentations on this form may be subject to criminal prosecution pursuant to 18 U.S.C. § 1001.**

1. Name of Traveler: John Seibels
2. a. Name of Accompanying Relative: \_\_\_\_\_ OR None
- b. Relationship to Traveler:  Spouse  Child  Other (specify): \_\_\_\_\_
3. a. Dates: Departure: 5/18/2023 Return: 5/21/2023
- b. Dates at Personal Expense, if any: \_\_\_\_\_ OR None
4. Departure City: Washington, D.C. Destination: Nashville, TN. Return City: Washington, D.C.
5. Sponsor(s), Who Paid for the Trip: The Cylinder Inc.
6. Describe Meetings and Events Attended:  
Meetings and events included policy sessions, hands on rage time, meeting with various stakeholders, lunch and learns, dinners with expert guests and more. A heavy focus was taken on federal policy insruction and education during the morning with hands on training in the afternoons.
7. Attached to this form are **each** of the following, *signify that each item is attached by checking the corresponding box:*
  - a.  a completed *Sponsor Post-Travel Disclosure Form*;
  - b.  the *Primary Trip Sponsor Form* completed by the trip sponsor **prior** to the trip, **including all** attachments **and** the *Additional Sponsor Form(s)*;
  - c.  page 2 of the completed *Traveler Form* submitted by the employee; **and**
  - d.  the letter from the Committee on Ethics approving my participation on this trip.
8. a.  I represent that I participated in each of the activities reflected in the attached sponsor's agenda.  
**Signify statement is true by checking the box.**
- b. If not, explain:

**I certify that the information contained on this form is true, complete, and correct to the best of my knowledge.**

Signature of Traveler:  Date: 06/05/2023

I authorized this travel in advance. I have determined that all of the expenses listed on the attached *Sponsor Post-Travel Disclosure Form* were necessary and that the travel was in connection with the employee's official duties and would not create the appearance that the employee is using public office for private gain.

Name of Supervising Member: Bruce Westerman Date: 6/5/2023

Signature of Supervising Member:



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# COMMITTEE ON ETHICS

## SPONSOR POST-TRAVEL DISCLOSURE FORM

Original  Amendment

This form must be completed by an officer of any organization that served as the primary trip sponsor in providing travel expenses or reimbursement for travel expenses to House Members, officers, or employees under House Rule 25, clause 5. **A completed copy of the form must be provided to each House Member, officer, or employee who participated on the trip within ten days of their return.** You must answer all questions, and check all boxes, on this form for your submission to comply with House rules and the Committee's travel regulations. Failure to comply with this requirement may result in the denial of future requests to sponsor trips and/or subject the current traveler to disciplinary action or a requirement to repay the trip expenses.

**NOTE: Willful or knowing misrepresentations on this form may be subject to criminal prosecution pursuant to 18 U.S.C. § 1001.**

1. Sponsor(s) who paid for the trip: The Cylinder Inc.
2. Travel Destination(s): Nashville, Tennessee
3. Date of Departure: 5/18/23 Date of Return: 5/21/23
4. Name(s) of Traveler(s): John Seibels

*Note:* You may list more than one traveler on a form only if *all* information is *identical* for each person listed.

5. Actual amount of expenses paid on behalf of, or reimbursed to, each individual named in Question 4:

	Total Transportation Expenses	Total Lodging Expenses	Total Meal Expenses	Total Other Expenses (dollar amount per item and description)
Traveler	\$839.19	\$1,248.74	\$644.45	0
Accompanying Family Member	0	0	0	0

6.  All expenses connected to the trip were for actual costs incurred and not a *per diem* or lump sum payment. Signify statement is true by checking box.

I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: Michael B. Williams Digitally signed by Michael B. Williams  
Date: 2023.06.02 10:45:19 -04'00' Date: 06/02/2023

Name: Michael B. Williams Title: Co-Founder

Organization: The Cylinder, Inc.

I am an officer of the above-named organization. Signify statement is true by checking box.

Address: 6085 Lake Forrest Dr. Suite 200B, Atlanta, GA 30328

Email: michael@thecylinder.org Telephone: 404-401-2945

*Committee staff may contact the above-named individual if additional information is required.*

If you have questions regarding your completion of this form, please contact the Committee on Ethics at 202-225-7103.



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# COMMITTEE ON ETHICS

## PRIMARY TRIP SPONSOR FORM

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers, or employees under House Rule 25, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer, or employee, who will then forward it to the Committee together with a *Traveler Form* **at least 30 days before the start date of the trip**. The trip sponsor should *NOT* submit the form directly to the Committee. The Committee website ([ethics.house.gov](http://ethics.house.gov)) provides detailed instructions for filling out the form.

**NOTE: Willful or knowing misrepresentations on this form may be subject to criminal prosecution pursuant to 18 U.S.C. § 1001. Failure to comply with the Committee's Travel Regulations may also lead to the denial of permission to sponsor future trips.**

1. Sponsor who will be paying for the trip:

The Cylinder Inc.

2.  I represent that the trip will not be financed, in whole or in part, by a registered federal lobbyist or foreign agent. Signify that the statement is true by checking box.

3. **Check only one.** I represent that:

a.  The primary trip sponsor has not accepted from any other source, funds intended directly or indirectly to finance any aspect of the trip: **OR**

b.  The trip is arranged without regard to congressional participation and the primary trip sponsor has accepted funds only from entities that will receive a tangible benefit in exchange for those funds: **OR**

c.  The primary trip sponsor has accepted funds from other source(s) intended directly or indirectly to finance all or part of this trip and has enclosed disclosure forms from each of those entities.

If "c" is checked, list the names of the additional sponsors:

4. Provide names and titles of **ALL** House Members *and* employees you are inviting. **For each House invitee, provide an explanation of why the individual was invited** (include additional pages if necessary):

John Seibels - Expertise in civil rights policy

5. Yes  No  Is travel being offered to an accompanying family member of the House invitee(s)?

6. Date of departure: 5/18/23 Date of return: 5/21/23

7. a. City of departure: Washington, DC

b. Destination(s): Nashville, TN

c. City of return: Washington, DC

8. **Check only one.** I represent that:

a.  The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: **OR**

b.  The sponsor of the trip does not retain or employ a registered federal lobbyist or foreign agent: **OR**

c.  The sponsor employs or retains a registered federal lobbyist or foreign agent, but the trip is for attendance at a one-day event *and* lobbyist / foreign agent involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations.

9. **Check only one of the following:**

a.  I checked 8(a) or (b) above; **OR**

b.  I checked 8(c) above but am not offering any lodging; **OR**

c.  I checked 8(c) above and am offering lodging and meals for one night; **OR**

d.  I checked 8(c) above and am offering lodging and meals for two nights. If you checked this box, explain why the second night of lodging is warranted:



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# COMMITTEE ON ETHICS

10.  Attached is a detailed agenda of the activities House invitees will be participating in during the travel (i.e., an hourly description of planned activities for trip invitees). *Indicate agenda is attached by checking box.*
11. **Check only one of the following:**
- a.  I represent that a registered federal lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip. *Signify that the statement is true by checking box; OR*
- b.  *Not Applicable.* Trip sponsor is a U.S. institution of higher education.
12. For **each** sponsor required to submit a sponsor form, describe the sponsor's interest in the subject matter of the trip **and** its role in organizing and/or conducting the trip:

The Cylinder Inc. is a non-profit 501(c)(3) organization dedicated towards educating Americans about our nation's civil rights. The Cylinder planned this trip to educate participants on the Second Amendment in practice and in theory. The Cylinder itself planned and executed this trip.

13. **Answer parts a and b. Answer part c if necessary:**

- a. Mode of travel: Air  Rail  Bus  Car  Other  (specify: \_\_\_\_\_)
- b. Class of travel: Coach  Business  First  Charter  Other  (specify: \_\_\_\_\_)
- c. If travel will be first class, or by chartered or private aircraft, explain why such travel is warranted:

14.  I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). *Signify that the statement is true by checking the box.*

15. **Check only one.** I represent that either:

- a.  The trip involves an event that is arranged or organized *without regard* to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees; **OR**

- b.  The trip involves events that are arranged specifically *with regard* to congressional participation.

If "b" is checked:

1) Detail the cost *per day* of meals (approximate cost may be provided):

2) Provide the reason for selecting the location of the event or trip:

16. Name, nightly cost, and reasons for selecting each hotel or other lodging facility:

Hotel Name: The J.W. Marriott City: Nashville, TN Cost Per Night: \$359

Reason(s) for Selecting: Central location, availability

Hotel Name: \_\_\_\_\_ City: \_\_\_\_\_ Cost Per Night: \_\_\_\_\_

Reason(s) for Selecting: \_\_\_\_\_

Hotel Name: \_\_\_\_\_ City: \_\_\_\_\_ Cost Per Night: \_\_\_\_\_

Reason(s) for Selecting: \_\_\_\_\_

17.  I represent that all expenses connected to the trip will be for actual costs incurred and not a per diem or lump sum payment. *Signify that the statement is true by checking the box.*



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### 18. Total Expenses for each Participant:

<input type="checkbox"/> Actual Amounts <input checked="" type="checkbox"/> Good Faith Estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or Employee	\$600	\$1,077.00	\$350
For each Accompanying Family Member			

  

	Other Expenses (dollar amount per item)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or Employee		
For each Accompanying Family Member		

**NOTE: Willful or knowing misrepresentations on this form may be subject to criminal prosecution pursuant to 18 U.S.C. § 1001.**

### 19. Check only one:

- a.  I certify that I am an officer of the organization listed below; **OR**
- b.  Not Applicable. Trip sponsor is an individual or a U.S. institution of higher education.

### 20. I certify by my signature that

- a. I read and understand the Committee's Travel Regulations;
- b. I am not a registered federal lobbyist or registered foreign agent; and
- c. The information on this form is true, complete, and correct to the best of my knowledge.

Signature: Michael B. Williams Digitally signed by Michael B. Williams Date: 2023.04.27 11:08:12 -04'00' Date: 04/27/2023

Name: Michael B. Williams Title: Co-CEO

Organization: The Cylinder

Address: 2085 Lake Forrest Dr Suite 200B

Email: michael@thecylinder.org Telephone: (404) 401-2945

## INSTRUCTIONS

Complete the *Primary Trip Sponsor Form* and submit the agenda, invitation list, any attachments, and any *Additional Trip Sponsor Forms* directly to the Travelers.

Written approval from the Committee on Ethics is required before traveling on this trip. The Committee on Ethics will notify the House invitees directly and will not notify the trip sponsors.

**Willful or knowing misrepresentation on this form may be subject to criminal prosecution under 18 U.S.C. § 1001. Signatures must comply with section 104(bb) of the Travel Regulations.**

**For questions, please contact the Committee on Ethics at:**

1015 Longworth House Office Building  
Washington, D.C. 20515

[ethicscommittee@mail.house.gov](mailto:ethicscommittee@mail.house.gov) | 202-225-7103  
More information and forms available at [ethics.house.gov](http://ethics.house.gov)



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# COMMITTEE ON ETHICS

## TRAVELER FORM

This form should be completed by House Members, officers, or employees seeking Committee approval of privately-sponsored travel or reimbursement for travel under House Rule 25, clause 5. The completed form should be submitted directly to the Committee by each invited House Member, officer, or employee, together with the completed and signed trip sponsor form(s) and any attachments. A copy of this form, minus this initial page, will be made available for public inspection. This form, and any attachments, may be faxed to the Committee at 202-225-7392, sent or delivered to the Committee at 1015 Longworth, or e-mailed to [travel.requests@mail.house.gov](mailto:travel.requests@mail.house.gov).

**Your completed request must be submitted to the Committee no less than 30 days before your proposed departure date.** Absent exceptional circumstances, permission will not be granted for requests received less than 30 days before the trip commences. **You must receive explicit approval from the Committee before you depart on this trip.**

Name of Traveler: John Seibels

NOTE: Willful or knowing misrepresentations on this form may be subject to criminal prosecution pursuant to 18 U.S.C. § 1001.

I certify that the information contained on both pages of this form is true, complete, and correct to the best of my knowledge.

Signature: 

Name of Signatory (if other than traveler): \_\_\_\_\_

For Staff (name of employing Member or Committee): House Committee on Natural Resources

Office Address: 1324 Longworth House Office Building

Telephone Number: 202-225-2761

Email Address of Contact Person: john.seibels@mail.house.gov

Check this box if the sponsoring entity is a media outlet, the purpose of the trip is to make a media appearance sponsored by that entity, and these forms are being submitted to the Committee less than 30 days before the trip departure date.

NOTE: You must complete all of the contact information fields above, as Committee staff may need to contact you if additional information is required.

**KEEP A COPY OF THIS FORM.** Page 2 (but not this page) must be submitted to the Clerk as part of the post-travel disclosure required by House Rule 25. Travel Regulation § 404(d) also requires you to keep a copy of all request forms and supporting paperwork for three subsequent Congresses from the date of travel.

If there are any questions regarding this form, please contact the Committee on Ethics at 202-225-7103 or via e-mail: [travel.requests@mail.house.gov](mailto:travel.requests@mail.house.gov).



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# COMMITTEE ON ETHICS

## TRAVELER FORM

1. Name of Traveler: John Seibels +

2. Sponsor(s) who will be paying for the trip: The Cyliner Inc.

3. City and State or Foreign Country of Travel : Nashville, TN

4. a. Date of Departure: 5/18/23 Date of Return: 5/21/23

b. Will you be extending the trip at your personal expense?  Yes  No

If yes, list dates at personal expense: \_\_\_\_\_

5. a. Will you be accompanied by a family member at the sponsor's expense?  Yes  No If yes:

(1) Name of Accompanying Family Member: \_\_\_\_\_

(2) Relationship to Traveler:  Spouse  Child  Other (specify): \_\_\_\_\_

(3) Accompanying Family Member is at least 18 years of age:  Yes  No

6. a. Did the trip sponsor answer "Yes" to Question 8(c) on the *Primary Trip Sponsor Form* (i.e., travel is sponsored by an entity that employs a registered federal lobbyist or a foreign agent)?  Yes  No

b. If yes, and you are requesting lodging for two nights, explain why the second night is warranted:

\_\_\_\_\_  
\_\_\_\_\_

7. *Primary Trip Sponsor Form* is attached, including agenda, invitee list, and any other attachments and contributing sponsor forms:  Yes  No

NOTE: The agenda should show the traveler's individual schedule, including departure and arrival times and identify the specific events in which the traveler will be participating.

8. Explain why participation in the trip is connected to the traveler's individual official or representational duties. **Staff should include their job title and how the activities on the itinerary relate to their duties.**

I work as the Press Secretary for the Natural Resources Committee. This education about the issues and ways to communicate them will help make me more effective in my role for communicating our priorities to constituents and committee members.

9. **Is the traveler aware of any registered federal lobbyists or foreign agents involved planning, organizing, requesting, or arranging the trip?**  Yes  No

10. For staff travelers, to be completed by your employing Member:

### ADVANCED AUTHORIZATION OF EMPLOYEE TRAVEL

I hereby authorize the individual named above, an employee of the U.S. House of Representatives who works under my direct supervision, to accept expenses for the trip described in this request. I have determined that the above-described travel is in connection with my employee's official duties and that acceptance of these expenses will not create the appearance that the employee is using public office for private gain.

Signature of Employing Member Bruce Westerman Date 5/9/23

**The Cylinder – May Summit**  
May 18 – 21, 2023  
The J.W. Marriott | Nashville, Tennessee

**Thursday, May 18<sup>th</sup>**

**6:00 PM – 9:00 PM:** Welcome cocktail reception & Casual Dinner

**Friday, May 19<sup>th</sup>**

**7:00 AM – 8:30 AM:** Informal breakfast and Roundtable Discussion of history of Civil Rights, in the Colonial and Early American setting

**8:30 AM:** Shuttle to range

**9:00 AM – 12:30 PM:** Range and Class Time 1

**12:30 PM – 1:30 PM:** Working Lunch and Roundtable Discussion of Civil Rights evolution from Early America to the Civil War

**1:30 PM – 4:00 PM:** Range and Class Time 2

**4:00 PM:** Return to Hotel

**6:00 PM – 9:30 PM:** Happy Hour and Dinner

**9:30 PM:** Optional drinks at rooftop bar

**Saturday, May 20<sup>th</sup>**

**7:00 AM – 8:30 AM:** Informal breakfast and Roundtable Discussion of Civil Rights evolution from the Civil War to WWII

**8:30 AM:** Shuttle to range

**9:00 AM – 12:30 PM:** Range and Class Time 3

**12:30 PM – 2:30 PM** BBQ Lunch and Roundtable Discussion of Civil Rights evolution from WWII to 2008

**2:30 PM:** Return to Hotel

**4:30 PM – 6:30 PM** Roundtable Discussion of Civil Rights from 2008-Present

**6:30 PM:**

Optional Happy Hour

**7:30 PM – 9:00PM:**

Optional Dinner

**Sunday, May 21<sup>st</sup>**

**7:00 AM – 9:00AM:**

Informal breakfast, Roundtable Discussion of  
Lessons Learned



## 2A POLICY SUMMIT & CARBINE COURSE INVITATION

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**Thursday, May 18th – Sunday, May 21st**

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*JW Marriott / Nashville, TN*

Mark your calendars, because you are invited to join The Cylinder for our next training event in Nashville, TN! During your all-inclusive trip, you will learn how to safely and proficiently shoot with America's Gun, the AR-15 platform, from the best trainers that our nation has to offer – former Tier 1 military operators. By the time you return home, you will have a newfound understanding of both the practical applications of firearms as well as the political challenges that face the Second Amendment.

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If you would like to attend, please RSVP to reserve your spot.  
Complete details to follow.

[Michael@TheCylinder.org](mailto:Michael@TheCylinder.org) | (601) 491-2915

Michael Guest, Mississippi  
*Chairman*

Susan Wild, Pennsylvania  
*Ranking Member*

David P. Joyce, Ohio  
John H. Rutherford, Florida  
Andrew R. Garbarino, New York  
Michelle Fischbach, Minnesota

Veronica Escobar, Texas  
Mark DeSaulnier, California  
Deborah K. Ross, North Carolina  
Glenn F. Ivey, Maryland



ONE HUNDRED EIGHTEENTH CONGRESS

**U.S. House of Representatives**

COMMITTEE ON ETHICS

Thomas A. Rust  
*Staff Director and Chief Counsel*

Kelle A. Strickland  
*Counsel to the Chairman*

David Arrojo  
*Counsel to the Ranking Member*

1015 Longworth House Office Building  
Washington, D.C. 20515-6328  
Telephone: (202) 225-7103  
Facsimile: (202) 225-7392

May 18, 2023

Mr. John Seibels  
Committee on Natural Resources  
1324 Longworth House Office Building  
Washington, DC 20515

Dear Mr. Seibels:

This responds to your request dated May 12, 2023, requesting a waiver from the House Gift Rule to accept travel to Nashville, Tennessee, from May 18 to 21, 2023, from the Cylinder, Inc. (Cylinder), to participate in a program concerning civil rights. Subject to the guidance in this letter, you may accept the travel.

#### FACTUAL BACKGROUND

According to your letter, additional information provided to Committee counsel, and publicly available information, the background on this matter is as follows. You serve as a Press Secretary for the Committee on Natural Resources and are paid below the senior staff rate in that position.<sup>1</sup> You were invited by Cylinder to participate in a program focused on the right to keep and bear arms (Program). The Program consists of briefings about civil rights, classroom time focused on gun skills and safety, and time on a firing range. According to Michael Williams, Cylinder's Co-Chief Executive Officer, hands-on practice of gun skills helps program attendees gain a deeper understanding of firearms policy as applied to firearms themselves. You met Mr. Williams through a mutual friend and have interacted with him at various social gatherings. Mr. Williams stated you were invited because of your interest in Second Amendment policy. Mr. Williams further stated your employment with the House was not a factor in inviting you to the Program, but he was aware of your House employment when he extended the offer.

Cylinder offered to pay for your transportation, lodging, and meals for its program running from May 18 to 21, 2023. Cylinder estimates the total expenses will be approximately \$2,277 for roundtrip transportation, three nights lodging, meals, and ammunition during the

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<sup>1</sup> House staff may be subject to financial disclosure filing requirements for a number of reasons, including 1) they are paid at or above the senior staff rate (\$141,022 in 2023, an amount subject to change in future years) for 60 days or more during the calendar year, even if on a temporary basis; 2) they are designated a "principal assistant" for financial disclosure filing purposes by their employing Member; and 3) they are a shared employee of three or more offices, regardless of their rate of pay. Please contact the Committee if you have further questions about financial disclosure. See Ethics in Government Act (EIGA), 5 U.S.C. § 13101(13).

Mr. John Seibels

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case law) may affect the analysis or conclusions drawn in this advisory opinion. The Committee reserves the right to reconsider the questions and issues raised in this advisory opinion and to rescind, modify, or terminate this opinion if required by the interests of the House. However, the Committee will rescind an advisory opinion only if relevant and material facts were not completely and accurately disclosed to the Committee at the time the opinion was issued. In the event that this advisory opinion is modified or terminated, the Committee will not take any adverse action against you with respect to any action taken in good faith reliance upon this advisory opinion so long as such conduct or such action was promptly discontinued upon notification of the modification or termination of this advisory opinion.

If you have any further questions, please contact the Committee's Office of Advice and Education at extension 5-7103.

Sincerely,

A handwritten signature in blue ink that reads "Michael Guest". The signature is written in a cursive style with a large initial "M".

Michael Guest  
Chairman

A handwritten signature in blue ink that reads "Susan Wild". The signature is written in a cursive style with a large initial "S".

Susan Wild  
Ranking Member

MG/SW:smm

Program. Cylinder estimates 10 other individuals will also participate in the Program, and Cylinder will cover the travel expenses for all but one of the other participants. According to Mr. Williams, the other participants will be Cylinder officers and executives, as well as people who worked in the former Administration and are now consultants. You are the only House staffer participating in the Program. You understand you will need to take leave to participate in the Program.

Cylinder was formed in August 2021 and is organized under section 501(c)(3) of the Internal Revenue Code. Cylinder does not employ or retain a registered federal lobbyist. One of Cylinder's missions is to cultivate the next generation of political leaders through hands-on training and education. Cylinder organized the Program to educate participants on the Second Amendment in practice and in theory.

### LEGAL BACKGROUND & ANALYSIS

The gift rule prohibits Members, officers, and employees of the House from accepting any gifts, except as specifically provided in the rule.<sup>2</sup> The gift rule includes a provision allowing the acceptance of gifts "resulting from the outside business or employment activities of the Member . . . or employee of the House (or other outside activities that are not connected to the duties of such individual as an officeholder) . . . if such benefits have not been offered or enhanced because of the official position of such individual and are customarily provided to others in similar circumstances."<sup>3</sup> However, it appears that this provision does not apply because Mr. Williams knew of your House employment when he invited you to participate in the Program. Separately, a provision of the gift rule authorizes the Committee to grant a gift rule waiver "in an unusual case," provided that there is no conflict of interest or appearance of impropriety.<sup>4</sup>

Based on the information you and Cylinder provided, the Committee believes that this is an appropriate case to exercise the Committee's waiver authority. Accordingly, the Committee grants you a waiver from the gift rule to accept travel to the Program. Specifically, the Committee's determination is based on the facts that the Program contains significant portions that are recreational in nature, Cylinder is a § 501(c)(3) organization, you are the only House employee in the Program, and Cylinder does not employ or retain a registered federal lobbyist.

This waiver is limited to your acceptance of travel to the Program. It does not extend to any additional gifts you may receive as part of your participation in the Program. Any gifts offered to you from other sources during the Program must also comply with the House gift rule. Furthermore, you may not use or permit the use of your Congressional title or position in connection with the Program, except as part of your biography. Your Congressional employment, along with your educational background and additional work experience, may be

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<sup>2</sup> House Rule 25, cl. 5(a)(1)(A)(i).

<sup>3</sup> *Id.* at cl. 5(a)(3)(G)(i).

<sup>4</sup> *Id.* at cl. 5(a)(3)(T); Comm. on Ethics, *House Ethics Manual*, Gifts Chapter, XI(Y), [https://ethics.house.gov/house-ethics-manual/gifts#\\_General\\_Waiver](https://ethics.house.gov/house-ethics-manual/gifts#_General_Waiver).

included in a biography, so long as your Congressional employment is not unduly highlighted. You will need to take annual leave to participate in any events related to the Program that occur during your work hours.

Although you indicated you are currently paid below the senior staff rate, if your situation changes and you are required to file a financial disclosure statement for calendar year 2023, you must report expenses to attend the Program on Schedule G (“Gifts”) of that statement.<sup>5</sup>

### LIMITATIONS

The response above constitutes an advisory opinion concerning the application of House Rule 25 and the EIGA. The following limitations apply to this opinion:

- This advisory opinion is issued only to Mr. John Seibels, the requestor of this opinion. This advisory opinion cannot be relied upon by any other individual or entity.
- This advisory opinion is limited to the current provisions and interpretation of the House rule and federal statute specifically noted above. No opinion is expressed or implied herein regarding the application of any other federal, state, or local statute, rule, regulation, ordinance, or other law that may be applicable to the proposed conduct described in this letter, including, without limitation, the Internal Revenue Code.
- This advisory opinion will not bind or obligate any entity other than the Committee on Ethics of the United States House of Representatives.
- This advisory opinion is limited in scope to the specific proposed conduct described in this letter, the specific facts represented to the Committee, and the understanding of those facts to the extent indicated in this letter and does not apply to any other conduct or facts, including that which appears similar in nature or scope to that described in this letter. Should this letter misstate any facts in this matter, the opinion and advice may no longer apply, and you should inform the Committee as soon as possible to determine if the advice and opinion in this letter apply to the accurate factual basis.

The Committee will take no adverse action against you in regard to any conduct that you undertake, or have undertaken, in good faith reliance upon this advisory opinion, so long as you have presented a complete and accurate statement of all material facts relied upon herein, and the proposed conduct in practice conforms with the information you provided, as addressed in this opinion.

Changes or other developments in the law (including, but not limited to, the Code of Official Conduct, House rules, Committee guidance, advisory opinions, statutes, regulations, or

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<sup>5</sup> 5 U.S.C. § 13104(a)(2)(A).