

Omar Ashmawy
Chief Counsel
Office of Congressional Ethics
U.S. House of Representatives
425 3rd Street, S.W. Suite 1110
Washington, DC 20024

Dear Mr. Ashmawy,

We respectfully request that the Office of Congressional Ethics (“OCE”) investigate the fact that Representative Steven Horsford exploited his official position for wholly inappropriate conduct and for the subsequent manner in which he concealed these matters. This pattern is a severe departure from, and a disregard for, the standards of the House and constitutes a disregard for public trust.

I. Background

Representative Steven Horsford was elected in November of 2018 to represent Nevada’s 4th Congressional District, having previously been elected in 2012 for one term.¹

In May of 2020, news outlets reported that Representative Horsford had been involved in an ongoing affair with Gabriela Linder, who at the start of their relationship was an intern for Senator Reid, and 15 years younger than Representative Horsford.² According to Ms. Linder, the relationship continued intermittently for a decade, ending in 2019.³

News outlets began reporting this story after Ms. Linder shared the details of the relationship through a public podcast. In an interview with the Las Vegas Review-Journal, she shared that “Horsford offered her financial support, introduced her to political connections and filmed a segment for her young son’s YouTube show using his congressional staff.”⁴

In 2012, “Horsford drew criticism for a ‘pay to play’ proposal that offered access to himself and other lawmakers in exchange for campaign contributions and for accepting a trip to the Bahamas from an online poker company, PokerStars, that wanted legal changes in Nevada.”⁵ Additionally, the article documented “a history of defaulting on car and home loans, not paying bills, and being repeatedly sued to force him to pay, according to legal documents that show the congressional candidate also ignored a traffic ticket until his driver’s license was suspended.”⁶

¹ Nevada Secretary of State, [2018 Election Results](#), General Election, (Nov. 27, 2018); Nevada Secretary of State, [2012 Election Results](#), General Election, (Nov. 27, 2012).

² Rory Appleton, [Horsford admits to extramarital affair after podcaster discloses relationship](#), Las Vegas Review-Journal (May 15, 2020).

³ Lee Brown, [Nevada congressman admits to affair with intern after podcast exposé](#), New York Post (May 17, 2020).

⁴ Appleton, *supra* note 2.

⁵ Laura Myers, [Republicans document Horsford financial woes](#), Las Vegas Review-Journal (March 29, 2012).

⁶ *Id.*

II. Law

The Code of Ethics for Government Service requires that members “[u]phold the Constitution, laws, and legal regulations of the United States and of all governments therein and never be a party to their evasion.”⁷

The House Ethics Manual holds that, “[g]overnment is a trust, and the officers of the government are trustees; and both the trust and the trustees are created for the benefit of the people.”⁸

The Congressional Handbook provides that a Members’ Representational Allowance (“MRA”) may only be used for official and representational expenses. It may not be used for personal expenses. The House Code of Official Conduct and the House Ethics Manual provides that official resources of the House include the use of official staff time, which cannot be for a personal use.⁹

House Rule 23 holds that a member shall behave at all times in a manner that shall reflect creditably on the House.¹⁰

The House Committee on Ethics in the Report for the 115th Congress, holds that “the Committee has asserted jurisdiction over alleged conduct that may have violated laws, regulations, or standards of conduct, which occurred during an initial successful campaign for the House of Representatives.”¹¹

III. Analysis

Members must uphold the Constitution and the laws of the United States, this includes laws governing official conduct. Federal law makes clear that official resources, including staff time, may not be used for personal benefit.¹² Ms. Linder has stated that Representative Horsford used official relationships to make introductions on her behalf as well as allowing his staff to complete a film for her son’s YouTube show.¹³ It has also been reported that during the course of an extramarital affair Representative Horsford offered Ms. Linder financial support.¹⁴ All sources of funds available to Representative Horsford are wholly prohibited from use for this purpose, including campaign, official, and personal funds if used in furtherance of his campaign or official duties. Given the nature of the relationship and the fact that it was concealed for ten years, it raises questions as to the propriety of these payments, professional introductions, and staff time.

As an elected official, Representative Horsford has a duty to maintain public trust with his electorate.¹⁵ Any potential use of his influence or authority to conceal the nature of his relationship is a serious abuse of this public trust, as well as a violation of the law. According to a news outlet,

⁷ Committee on Standards of Official Conduct, U.S. House of Representatives, House Ethics Manual, 20 (2008).

⁸ *Id.*, at 2.

⁹ Committee on House Administration, U.S. House of Representatives, [Members’ Congressional Handbook](#), 2 (2018); Committee on Standards of Official Conduct, U.S. House of Representatives, House Ethics Manual, 197 (2008).

¹⁰ Rules of the House of Representatives, Rule 23, Cl. 1 (2019).

¹¹ [House of Representatives Report](#) 115-1125, 15 (Jan. 2, 2019).

¹² Committee on House Administration, *supra* note 9; Committee on Standards of Official Conduct, *supra* note 9.

¹³ Appleton, *supra* note 2.

¹⁴ Appleton, *supra* note 2.

¹⁵ Committee on Standards of Official Conduct, *supra* note 7.

Representative Horsford has also previously attempted to use his official office for personal gain with “pay to play” proposals for a video poker company seeking favorable legislation in Nevada.¹⁶ Members also have a duty to maintain trust and reflect properly on the institution of House. This includes behavior prior to serving as a Member of Congress.¹⁷ Representative Horsford’s past behavior of unpaid debts, contractual violations, and traffic citations demonstrates a perpetual history of failing to abide by the law.¹⁸ His lack of transparency in his own life fails to reflect positively upon the House, warranting investigation.

IV. Request for Action

Representative Steven Horsford’s concealment of an ongoing affair implicates an abuse of his official position and potentially federal law. His use of financial payments, staff time, and repeated run-ins with legal obligations betray the public trust. Ultimately, his conduct for the past ten years destroys the credibility of his office and fails to maintain the integrity of the House. Therefore, we respectfully urge OCE to investigate this matter and any potential violations of federal law and standards of House ethics.

Sincerely,



Caitlin Sutherland
Executive Director

¹⁶ Myers, *supra* note 5.

¹⁷ House of Representatives Report, *supra* note 11.

¹⁸ Appleton, *supra* note 2.