

# Congress of the United States

## House of Representatives

COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM

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<http://oversight.house.gov>

June 14, 2018

Mr. C. Renzi Stone  
Chairman and CEO  
Saxum  
621 N. Robinson Ave., Suite 600  
Oklahoma City, OK 73102

Dear Mr. Stone:

I am writing to request documents regarding your actions in assisting EPA Administrator Scott Pruitt in obtaining highly sought-after tickets to attend the Rose Bowl on New Year's Day where the University of Oklahoma Sooners played in the semifinal for the College Football Playoff National Championship.

You have served as a member of the University of Oklahoma Board of Regents since your appointment by Governor Mary Fallin in 2015.<sup>1</sup> The Board of Regents is the official governing body of the school and is composed of seven citizen members appointed to seven-year terms by the Governor with the advice and consent of the State Senate.<sup>2</sup>

You are also the founder, Chairman, and Chief Executive Officer of Saxum, which describes itself as "a full-service marketing communications agency."<sup>3</sup> Your website describes you as having "extensive experience in marketing strategy, crisis communication and public affairs for energy companies."<sup>4</sup> In fact, Saxum has a large energy practice, with clients including Williams, the American Petroleum Institute, and GE Oil & Gas.<sup>5</sup>

At least one of Saxum's clients, Plains All American Pipeline, currently has a petition before the EPA to discharge hydrostatic test water from a pipeline in Corpus Christi, Texas.<sup>6</sup>

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<sup>1</sup> *Saxum Founder Renzi Stone is Named University of Oklahoma Regent*, NewsOK (Feb. 19, 2015) (online at <https://newsok.com/article/5394780/saxum-founder-renzi-stone-is-named-university-of-oklahoma-regent>).

<sup>2</sup> University of Oklahoma, *Board of Regents* (online at [www.ou.edu/regents/](http://www.ou.edu/regents/)) (accessed June 12, 2018).

<sup>3</sup> Saxum, *Our Story* (online at <https://saxum.com/who-we-are/about/>) (accessed June 12, 2018).

<sup>4</sup> Saxum, *C. Renzi Stone* (online at <https://saxum.com/who-we-are/about/>) (accessed June 12, 2018).

<sup>5</sup> Saxum, *Why Energy* (online at <https://saxum.com/what-we-do/energy/>) (accessed June 12, 2018).

<sup>6</sup> Environmental Protection Agency, *Plains All American Pipeline, LP.-Corpus Christi Terminal West – Draft NPDES Permit No. TX0140147* (online at [www.epa.gov/tx/plains-all-american-pipeline-lp-corpus-christi-terminal-west-draft-npdes-permit-no-tx0140147](http://www.epa.gov/tx/plains-all-american-pipeline-lp-corpus-christi-terminal-west-draft-npdes-permit-no-tx0140147)) (accessed June 12, 2018).

On May 18, 2018, Committee staff conducted a transcribed interview with Millan Hupp, Administrator Pruitt's former Director of Scheduling and Advance. During her interview, she informed Committee staff that you provided Administrator Pruitt with Rose Bowl tickets for him and his family:

- Q: Do you know where Mr. Pruitt got his Rose Bowl tickets?  
A: I do.  
Q: Where?  
A: From an acquaintance that works in some capacity for the university.  
Q: Who's that person?  
A: He serves as a—I'm sorry, I forget the term. He serves—he serves in some capacity for the university.  
Q: Do you remember his name?  
A: His name is Renzi.  
Q: I'm sorry?  
A: Renzi.  
Q: Can you just spell it?  
A: R-e-n-z-i.  
Q: Is that a last name or—  
A: That's a first name.  
Q: First name. What's his last name?  
A: Stone.  
Q: And did he give the tickets to Mr. Pruitt?  
A: No.  
Q: Mr. Pruitt paid for them?  
A: He did.  
Q: Do you know what he paid for them?  
A: I do not.<sup>7</sup>

Federal ethics rules prohibit government employees from accepting gifts, such as tickets to sporting events, unless they pay "market value."<sup>8</sup> A gift includes "any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or other item having monetary value."<sup>9</sup>

Federal ethics rules also prohibit government employees from soliciting or accepting gifts from a "prohibited source," which is defined as someone who:

- (1) Is seeking official action by the employee's agency;
- (2) Does business or seeks to do business with the employee's agency;
- (3) Conducts activities regulated by the employee's agency;

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<sup>7</sup> House Committee on Oversight and Government Reform, Interview of Millan Hupp (May 18, 2018).

<sup>8</sup> 5 C.F.R. § 2635.203(b)(10).

<sup>9</sup> 5 C.F.R. § 2635.203(b).

- (4) Has interests that may be substantially affected by the performance or nonperformance of the employee's official duties; or
- (5) Is an organization a majority of whose members are described in paragraphs (d)(1) through (4) of this section.<sup>10</sup>

Moreover, a government employee may not accept a gift provided "because of the employee's official position."<sup>11</sup>

Based on the information set forth above, I request that you produce, by June 28, 2018, the following documents, covering the time period from January 20, 2017, to the present:

- (1) all documents and communications between you, Administrator Pruitt, or any of your agents or representatives on any topic;
- (2) all documents and communications referring or relating to obtaining Rose Bowl tickets or any other tickets, gifts, or benefits for Administrator Pruitt or his family, including but not limited to:
  - (a) how the tickets were requested, by whom, and when was the request made;
  - (b) the process by which you obtained the tickets;
  - (c) the number of tickets/seats requested and obtained;
  - (d) the location of the seats for the tickets as well as the seat locations that Administrator Pruitt and his family members used;
  - (e) any additional benefits that came with the tickets such as food or drinks;
  - (f) the cost of the seats, including the face value of the tickets and the market value or price that similar tickets were sold in a comparable timeframe;
  - (g) whether Administrator Pruitt or anyone else paid for the tickets, the amount paid, and the manner of payment; and
  - (h) for whom or what block of recipients the tickets were originally reserved;
- (3) all documents and communications referring or relating to Administrator Pruitt's trip to California for the Rose Bowl, including but not limited to:
  - (a) Administrator Pruitt's security arrangements;
  - (b) tickets, parking, accommodations, or other arrangements for Administrator Pruitt and/or his security team;
  - (c) other events or activities during the trip, such as attending Walt Disney World or the Rose Bowl parade; and

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<sup>10</sup> 5 C.F.R. § 2635.203(d).

<sup>11</sup> 5 C.F.R. § 2635.202.

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- (4) all documents and communications referring or relating to the discussion of any other matters with Administrator Pruitt or EPA staff, including but not limited to any business requested, proposed, or completed by your company or any of your company's clients who have business or matters before the EPA.

Thank you for your consideration of this request.

Sincerely,



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Elijah E. Cummings  
Ranking Member

cc: The Honorable Trey Gowdy, Chairman