

Independent Ethics Commission – Formal Complaint Form

Before the Independent Ethics Commission  
of the State of Colorado

*For Commission Use Only*

Received date: \_\_\_\_\_

Case No.: \_\_\_\_\_

The Complainant is: Frank McNulty  
(name)

Mailing Address: 5190 S. University Blvd.  
Greenwood Village, CO 80121

Daytime telephone number: \_\_\_\_\_

Email address: Trust@publictrustinstitute.org

The Respondent is: Governor John Hickenlooper  
(name)

Mailing Address: Office of the Governo  
138 State Capitol Bldg  
Denver, CO 80203

Daytime telephone number: 303-866-2471

Email address: \_\_\_\_\_

When did the alleged violation occur: Oct. 11, 2018

Describe the specific acts or things complained of, with facts that provide a full understanding of the alleged violation(s). If possible, cite the specific ethical standards alleged to have been violated and describe how the violation(s) occurred. Use additional pages if necessary. Attach any documentary evidence you wish to submit.

After previously submitting a Complaint on October 12, 2018, Public Trust Institute, discovered another recent instance of Governor Hickenlooper flying on a private jet and likely violating Amendment 41's gift prohibitions by traveling on a corporate airplane and accepting travel expenses paid for by a corporation. On October 11, 2018, one day before the IEC complaint was filed, Governor Hickenlooper flew on a private airplane from Washington Dulles Airport to Centennial. Attached is a copy of Hickenlooper's schedule for Oct. 10<sup>th</sup> and 11<sup>th</sup>. This trip follows the pattern of disclosing commercial flight details and obscuring private flight details.

Description of acts or things complained of (continued):

Governor Hickenlooper's outbound flight to DCA on the 10<sup>th</sup> was a Frontier flight and only the confirmation number is redacted. His return flight from Dulles does not include any details other than arriving at Centennial Airport. There are no commercial flights from Dulles to Centennial. Most of Hickenlooper's schedule while in DC is redacted.

Advisement regarding remedies and penalties: Pursuant to Colo. Const. art. XXIX, § 6, a covered individual found to have breached the public trust for private gain is liable for double the amount of the financial equivalent of any benefits obtained by such actions. The manner of recovery and additional penalties may be provided by law. The Commission does not assess criminal penalties, award injunctive relief, or award damages to complainants.

I hereby acknowledge that the facts presented herein are true to the best of my knowledge, and I will cooperate in the process regarding this complaint and will appear at any proceeding of the Independent Ethics Commission if the complaint is scheduled for a hearing.

Signature:  \_\_\_\_\_

Attorney (if applicable): \_\_\_\_\_

Dated at Denver (City), Colorado, this 29 day of November, 2018.

Created by Article XXIX of the Colorado Constitution, the Independent Ethics Commission may review and hold hearings on matters falling within its jurisdiction as outlined in Article XXIX.

Wednesday, October 10, 2018

5:00 AM	
6:00 AM	6:00 AM - 6:30 AM Security pick up - 6 am --> DEN
7:00 AM	
8:00 AM	7:30 AM - 12:53 PM Frontier Flight 544 Departs DEN@7:30AM / Lands DCA@12:53PM (BOARDING ENDS AT 7:15 am) Trip Confirmation Number: [REDACTED]
9:00 AM	
10:00 AM	
11:00 AM	
12:00 PM	
1:00 PM	12:53 PM - 1:40 PM Security Pick Up - 12:53 pm DAC --> Brookings
2:00 PM	1:40 PM - 3:00 PM TAB 1 - Brookings Institute: "The Forgotten Americans" Panel@2:05PM (POC: Camilo M. Ramirez [REDACTED] INDOORS, BUS NESS/BUS NESS CASUAL [full itme of event: 2 - 4:00 pm] (Staff: Pat) Brookings Institution, 1775 Massachusetts Ave NW, Washington, DC 20036, USA (Falk Auditorium)
3:00 PM	3:00 PM - 3:30 PM Security Pick Up - 3:00 pm Brookings --> [REDACTED] 3 [REDACTED] [REDACTED] [REDACTED]
6:00 PM	6:00 PM - 8:48 PM TAB 4 - 51st Annual CSPC Awards Dinner REMARKS@8:12PM (POC: Hurst Renner, [REDACTED] INDOORS, BUSINESS [full time of event: 6:00 - 9:00 pm] Willard InterContinental: 1401 Pennsylvania Ave NW, Washington, DC 20004, USA (Ballroom)
7:00 PM	
8:00 PM	
9:00 PM	
10:00 PM	10:00 PM - 10:30 PM RON: InterContinental Hotels The Willard Washington D.C. (Confirmation # [REDACTED] InterContinental Hotels The Willard Washington D.C.: 1401 Pennsylvania Ave Nw Washington, DC 20004

Thursday, October 11, 2018



5:00 AM		
6:00 AM		
7:00 AM		
8:00 AM	[REDACTED]	
9:00 AM		
10:00 AM		
11:00 AM		
	11:45 AM - 12:00 PM Security Pick Up - 11:45 am CNN --> [REDACTED]	
12:00 PM	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	1:45 PM - 2:45 PM Security Pick up - 1:45 pm	
2:00 PM		
3:00 PM		
	3:45 PM - 6:00 PM → FLIGHT Dulles --> Centennial	
4:00 PM		
5:00 PM		
6:00 PM	6:00 PM - 6:45 PM Security Pick Up - 6 pm Centennial --> Hyatt Regency	
	6:45 PM - 7:15 PM TAB 14 - Denver Scholarship Foundation Annual Gala REMARKS@6:35PM OR AS SOON AS YOU ARRIVE (POC: Latia Henderson, [REDACTED]) [REDACTED] INDOORS, BUS NESS [full time of event: 6:30 - 8:00pm] Hyatt Regency Denver at Colorado Convention Center, 650 15th St, Denver, CO 80202, USA (Centennial Ballroom)	7:00 PM - 7:10 PM FYI - RhythmWorld Customer User Conference w/ Andy Grolnick REMARKS@8:30PM (POC: Michelle Rindler, [REDACTED]) INDOORS, BUSINESS CASUAL [full time of event: 7:00 - 9:00 pm] La Loma, 1801 Broadway, Denver, CO 80202, USA
7:00 PM	7:15 PM - 7:30 PM Security Pick Up - 7:15 pm	7:20 PM - 10:00 PM TAB 15 - QF CO Governor's Leadership Celebration w/ RSP REMARKS@7:30PM (POC: Katie Alger & Eric Hopfenbeck [REDACTED]) [REDACTED] INDOORS, BLACK T E OPTIONAL/FORMAL [full time of event: 5:30 pm - 11:00 pm] History Colorado Center, 1200 N Broadway, Denver, CO 80203, USA (Main Lobby, Dinner: Anschutz Hamilton Hall (Atrium))
8:00 PM		
9:00 PM		