

December 1, 2010

Rep. Colin Simpson, Speaker
P.O. Box 490
Cody, WY 82414
Fax (307) 527-7897
csimpson@skelaw.com

Rep. Edward A. Buchanan, Majority Floor
Leader
P.O. Box 850
Torrington, WY 82240
ebuchana@wyoming.com

Rep. W. Patrick Goggles, Minority Floor
Leader
505 Blue Sky Hwy
Ethete, WY 82520
Fax (307) 332-0230
pgoggles@wyoming.com

Bruce A. Salzburg
Attorney General's Office
123 Capitol Building
200 W. 24th Street
Cheyenne, WY 82002

Subject: Official complaint and request for investigation

I am a legal resident of Wyoming. I am writing to ask that you initiate a formal investigation of apparent violations of Wyoming conflict of interest and disclosure laws on the part of Wyoming State Rep. Sue Wallis (R-Campbell) as well as possible violations of laws relating to fraud, securities fraud, and gambling. Please consider this a complaint about Rep. Wallis' conduct and a request for a complete investigation thereof.

Rep. Wallis is on a crusade to return horse slaughter for human consumption to the U.S. I believe she is improperly, and even fraudulently, using her position as a Wyoming Representative to promote and misrepresent the issue to her financial benefit. Not only has Rep. Wallis neglected

to recuse herself on votes on bills in which she has had a personal financial interest, but she has actually *sponsored* them.

In December 2008, Rep. Sue Wallis was the co-sponsor of a resolution submitted to the National Conference of State Legislatures (NCSL), Agriculture and Energy Committee. Rep. Wallis was the vice chair of the committee. The NCSL is a non-governmental lobbyist organization which serves the nation's 50 states legislators to advocate and lobby for the interests of states before Congress and federal agencies. NCSL adopted the resolution which basically called for legislative and lobbying efforts to enable and promote the commercial slaughter of horses for human consumption in the U.S., a practice that has not been legal since 2007. The passage of the resolution provided the authority for NCSL staff in Washington D.C. to lobby on Capitol Hill and establish the position of the States.

In 2009 Rep. Wallis then sponsored and voted for Wyoming HJR 8, <http://legisweb.state.wy.us/2009/Enroll/HJ0008.pdf>, a resolution calling for the defeat of federal legislation, HR 503/SB 727, the Conyers-Burton Prevention of Equine Cruelty Act. The federal legislation would make it illegal to possess, sell, purchase or transport horses in interstate or foreign commerce for slaughter for human consumption.

At the same time, over the past two years, Rep. Wallis and her associates have created a bewildering array of organizations, web pages and press releases concerning her efforts to reinstate horse slaughter. Her web sites frequently change their claims and/or simply disappear. These sites have contained false and misleading statements, promoted non-existent securities, and even included a high stakes private lottery.

Rep. Wallis is the paid, self-styled Executive Director of the United Organizations of the Horse (UOH), which, at one point, claimed to unite The United Horsemen's Front, The United Horsemen's Alliance, and The United Horsemen's Political & Legal Action Fund. Rep. Wallis has gone as far as promoting The United Horsemen's Front on her legislative web site.

Currently, the UOH claims to be a “nation-wide network of individuals and organizations who are concerned about the well-being of horses, horse people, and the horse industry.” The UOH is said to include the following:

“United Organizations of the Horse – a mutual benefit nonprofit organized primarily to work in the political arena is registered in Wyoming.” Currently, the organization's tax status is delinquent. <https://wyobiz.wy.gov/Business/FilingDetails.aspx?FilingNum=2009-000577123>

“United Horsemen”, formerly called “United Horsemen's Front” – a 501(c)(3) nonprofit educational and charitable organization. Rescue, Rejuvenation, and Pasture components of the Unified Equine System reside under the non-profit from an operational standpoint. <https://wyobiz.wy.gov/Business/FilingDetails.aspx?FilingNum=2010-000590239> Despite this self-description, UH does not appear to have done any of these things to date. Its director, Dave Duquette, is a Quarter Horse breeder and trainer and has provided no evidence of doing anything for excess horses apart from creating them.

“Unified Equine LLC – a Wyoming limited liability company under which all humane horse processing and related businesses are operated.” http://www.unitedorgsofthehorse.org.php5-12.dfw1-1.websitetestlink.com/?page_id=81 Unified Equine LLC was not registered with the Wyoming Secretary of State’s Office until October 2, 2010, months after Rep. Wallis represented it as a legal entity that she used, as you will see below, to solicit investments.

The UOH lobbies directly for pro-horse slaughter interests, which means Rep. Wallis serves as a Wyoming legislator at the same time she acts as a paid lobbyist. Attached as Exhibits 1 and 2 are an e-mail and newsletter excerpt which Rep. Wallis and the United Horsemen’s Front (UHF) which is now called United Horsemen, circulated as if they are one, stating Sue Wallis is a Wyoming state representative and calling for the defeat of the Conyers-Burton Prevention of Equine Cruelty Act.

Also as an example of a blatant conflict of interest and abuse of her position as state legislator, attached is Exhibit 3, a newsletter from the former United Horsemen’s Front that solicits funds for Rep. Wallis personally and pro-horse slaughter interests, boasting that Rep. Wallis, as a member of the Wyoming Legislature, is its “greatest resource.” At this now defunct link, Rep. Wallis solicited and collected money to be paid to her personally, claiming to promote horse slaughter interests. http://www.wyoagcoalition.org/index_files/Page2084.htm

As you probably know, a 501(c)(3) non-profit is severely restricted in the amount of its funds it can use in any lobbying or political activity. It does not appear that UH does anything that is not political, and the intimate relationship of UOH and United Horsemen adds yet another possible illegality with which Rep. Wallis is involved, that is, commingling of tax-exempt and non-tax exempt funds.

Duquette and Rep. Wallis jointly solicit money from the public for this lobbying and so-called “education” in support of laws that would enable and promote the return of commercial horse slaughter to the U.S. and also that would defeat a proposed ban on the export of American horses for commercial slaughter for human consumption. <http://www.unitedhorsemensfront.org/>

For example, the PayPal button that was on Wallis’ web site initially went to UHF; now when the user clicks on “sign-up/join,” a page stating “click here” appears, and the browser goes to UHF, now called United Horsemen.

You are here: [Home](#) / [Join – Mail List](#)

[Join – Mail List](#)

[Click HERE to go to a page where you can join or support the work of the United Organizations of the Horse and United Horsemen](#)