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May 29, 2026

The Honorable James Lankford, Chairman
The Honorable Christopher A. Coons, Vice Chairman
United States Senate Select Committee on Ethics
220 Hart Senate Office Building
Washington, DC 20510

Re: Request for Investigation into Sean P. Dunn

Dear Chairman Lankford and Vice Chairman Coons:

I am writing to request that the United States Senate Select Committee on Ethics (the "*Committee*") investigate U.S. Senate employee Sean P. Dunn and his supervising employer Senator Jon Husted for a violation of U.S. Senate Rule 37, which guards against conflicts of interest. In short, Senator Husted's office appears to not only be serving the interests of Ohio voters, but also the interests of a lobbying firm that works for big pharma, tech and tobacco companies.

Mr. Dunn's own personal financial disclosure forms indicate that while employed in the U.S. Senate, he received at least \$20,000 from an outside lobbying and governmental affairs firm in violation of Senate Rule 37. As a Senate staffer earning at least \$25,000, Mr. Dunn is prohibited from receiving compensation for providing professional services, including the type of consulting services performed by lobbyists and governmental affairs firms. In addition, as a highly paid senior staffer, Mr. Dunn is prohibited from receiving *any* compensation from an entity performing professional services involving a fiduciary duty. These restrictions are not merely technical, they were put in place to prevent conflicts between "the narrow interests of private employers and the broader interests of the general public."¹ And in fact, the firm at issue here is known to have worked for a slew of big companies in the healthcare, tech and tobacco industries.

Senator Husted, as Mr. Dunn's supervising Senator, had primary responsibility to prevent "any conflict of interest or the interference of outside activities with Senate duties."² He appears to have failed in that duty. The Committee should therefore immediately investigate this matter to stop further violations of Senate Rule 37 and protect Ohio constituents from a conflict of interest that may harm the integrity of their representation in the U.S. Senate. To that end, the Committee should investigate whether Senator Husted was aware of Mr. Dunn's conflict of interest and the extent to which Mr. Dunn's outside work may have impacted his ability to faithfully carry out his official duties.

¹ United States Senate Select Committee on Ethics, Senate Ethics Manual, S. Pub. 108-1 at 64 (2003) [hereinafter "Senate Ethics Manual"].

² Rule 37.3; Senate Rules Interpretive Ruling No. 97.

I. Factual Background

A. Mr. Dunn's Compensation from Statehouse Impact Group

Mr. Dunn began his Senate employment in Senator Husted's office on March 3, 2025, and filed a personal financial disclosure ("*New Filer PFD*") on April 16, 2025.³ Mr. Dunn filed his 2025 personal financial disclosure on May 14, 2026 ("*2025 PFD*") with the Committee.⁴

Mr. Dunn reported receiving \$2,500 in "Self-Employment Income" from Statehouse Impact Group LLC ("*Statehouse*") in Section 2 of his New Filer PFD, which requires filers to disclose earned and non-investment income received during the preceding calendar year and current year through the date of filing. Mr. Dunn then reported receiving \$22,652 of "Self-Employment Income" from Statehouse in Section 2 of his 2025 PFD, which requires filers to disclose earned and non-investment income received during the 2025 calendar year. Since Mr. Dunn only reported \$2,500 in income on his New Filer PFD, which included income received through April 16, 2025, the financial disclosures confirm that Mr. Dunn received at least \$20,000 from Statehouse in earned income *after* April 2025, when he filed his New Filer PFD, and *after* he was already a Senate employee. Mr. Dunn also reported on his 2025 PFD receiving between \$100,001 and \$1 million in unearned income from Statehouse.

Mr. Dunn reported that he began a position as a "Consultant" at Statehouse in March 2025 and continues to hold the position as of the date he filed his 2025 PFD on May 14, 2026.⁵ Statehouse Impact Group LLC is a government affairs firm based in Columbus, Ohio, which provides "lobbying, legislative analysis, regulatory analysis, procurement strategies, government affairs, grassroots counsel, and policy counsel" services.⁶ Statehouse represents clients in the technology, education, healthcare, insurance, tobacco, telecommunications, and energy industries.⁷ Their clients include AES Ohio, AT&T, Cordata Health, General Cigar, Meta Platforms, Ohio Automobile Dealers Association, Ohio Hospital Association, and Philip Morris International.⁸

Statehouse was originally founded as "Sean P. Dunn, LLC" on June 27, 2002.⁹ Statehouse adopted "Sean P. Dunn & Associates LLC" as a trade name on February 25, 2005.¹⁰ The

³ United States Senate Financial Disclosures, Sean P. Dunn, New Filer Report (filed Apr. 16, 2025), [hereinafter "New Filer PFD"].

⁴ United States Senate Financial Disclosures, Sean P. Dunn, 2025 Report (filed May 14, 2026), [hereinafter "2025 PFD"].

⁵ *Id.* See U.S. Senate Select Committee on Ethics, *Financial Disclosure Instructions and Report for Calendar Year 2025* at 13 (Issued March 2026) [hereinafter "Senate Instructions"].

⁶ Statehouse Impact Group, *Experience* (last accessed Apr. 1, 2026), <https://www.statehouseimpact.com/experience>.

⁷ Statehouse Impact Group, *About Us* (last accessed Apr. 1, 2026), <https://www.statehouseimpact.com/about-us>. See also Statehouse Impact Group, *Clients* (last accessed Apr. 1, 2026), <https://www.statehouseimpact.com/copy-of-experience>.

⁸ Statehouse Impact Group, *Clients* (last accessed Apr. 1, 2026), <https://www.statehouseimpact.com/copy-of-experience>.

⁹ Statehouse Impact Group LLC, *Articles of Incorporation*, filed with Ohio Sec'y of State (Jun. 27, 2002), available under Entity Number 1326890 at <https://businesssearch.ohiosos.gov/>.

¹⁰ Statehouse Impact Group LLC, *Trade Name Original Filing*, filed with Ohio Sec'y of State (Feb. 25, 2005), available under Entity Number 1326890 at <https://businesssearch.ohiosos.gov/>.

company officially changed its name to “Statehouse Impact Group LLC” on February 28, 2025.¹¹ Mr. Dunn was the founder and president of Sean P. Dunn & Associates.¹² Mr. Dunn was also a registered Ohio lobbyist that represented many entities over the course of his career, including AES Ohio, Cardinal Health, the Ohio Hospital Association, Swedish Match North America, and various industry groups.¹³ Mr. Dunn was registered to lobby in Ohio as recently as February 26, 2025, mere days prior to his employment in Senator Husted’s office.¹⁴

II. Violations of Senate Rule 37

Federal law and Senate Rules restrict the amount and source of outside income that employees of the Senate may accept.¹⁵ Senate Rule 37 broadly prohibits Senate employees from engaging in outside employment that is “inconsistent or in conflict” with their official Senate duties.¹⁶ An official staffer is required to report any outside professional activity to their supervisor, who is charged with “tak[ing] such action as he considers necessary for the avoidance of conflict of interest or interference with duties to the Senate.”¹⁷ The supervising Senator bears primary responsibility for identifying and preventing conflicts arising from such outside activities.¹⁸

Mr. Dunn’s filing of a new filer PFD report indicates that his 2025 compensation¹⁹ was above 120% of the GS-15 level.²⁰ Simply put, Mr. Dunn was among the highest paid staffers in Senator Husted’s office in 2025.

As a result, Mr. Dunn is subject to both Senate Rule 37(5)(a) and Senate Rule 37(5)(b). Senate Rule 37(5)(a) prohibits Mr. Dunn²¹ from affiliating with a firm, corporation, partnership or association to perform paid “professional services.”²² Professional services include, but are not

¹¹ Statehouse Impact Group LLC, *Ohio LLC - Amendment*, filed with Ohio Sec’y of State (Feb. 28, 2025), available under Entity Number 1326890 at <https://businesssearch.ohiosos.gov/>. See also Thomas M. Zaino, *Week in Review March 18, 2025*, ZHF CONSULTING LLC (Mar. 18, 2025) (reporting “Statehouse Impact Group recently changed its name from Sean P. Dunn & Associates, after Sean Dunn left to join the office of U.S. Sen. Jon Husted (R-OH).”).

¹² See, e.g., Ohio Governor’s Office of Workforce Transition, *About – Sean Dunn* (Jun. 3, 2019), <https://workforce.ohio.gov/about/board-members/sean-dunn>.

¹³ See, e.g., Carrie Ghose, *Ohio Lobbyists Weigh in on Role of Political Contributions in Public Policy*, COLUMBUS BUS. FIRST (Aug. 8, 2020) (recognizing Mr. Dunn as a “lobbyist for 20 years”). See also JLEC, *Active Agents and Employers by Date*, (enter 06/01/2018 as date; then select “Active Agent Details” button and search resulting .csv for “Dunn”).

¹⁴ JLEC, *Active Agents and Employers by Date*, <https://www2.jlec-olig.state.oh.us/OLAC/Reports/ActivityByDate> (enter 02/26/2025 as date; then select “Active Agent Summary” button and search resulting .csv for “Dunn”; repeat for 02/27/2025 and note absence of Mr. Dunn in Active Agent Summary file). See also, Kent Weeklies, *Arshinkoff Gets Job Lobbying Governor*, AKRON BEACON JOURNAL (Feb. 20, 2011); Henry J. Gomez, *Medicaid Expansion, Fracking Tax and Sales Tax Add Wrinkles to Busy Statehouse Lobbying Season*, CLEVELAND.COM (Mar. 10, 2013).

¹⁵ 5 U.S.C. §§ 13141-13146; Senate Rule 36.

¹⁶ Senate Rule 37(2).

¹⁷ Senate Rule 37(3).

¹⁸ *Id.* See also Senate Rules Interpretive Ruling No. 97.

¹⁹ Legistorm confirms that Mr. Dunn’s salary for a six-month period in 2025 was \$97,558.32. See Legistorm, Sean Dunn (last accessed May 23, 2026), https://www.legistorm.com/person/Sean_Patrick_Dunn/167134.html.

²⁰ See Senate Instructions at 4 (political fund designees and principal assistants are not required to file New Filer Reports).

²¹ The rule applies to staff whose rate of pay exceeds \$25,000 on an annualized basis. Mr. Dunn’s compensation in 2025 exceeded this threshold.

²² Senate Ethics Manual at 71.

limited to, legal, medical, engineering, architectural, real estate, insurance, or *consulting* services.²³ Senate Rule 37(5)(b) categorically prohibits the highest paid official staffers – including Mr. Dunn²⁴ – from receiving compensation from any firm, partnership, association, corporation, or other entity which provides professional services involving a fiduciary relationship.²⁵ This rule prohibits receiving “compensation” for any reason from a firm that performs services with a fiduciary relationship; it is not necessary for the official staffer to provide the fiduciary services to violate the rule.²⁶ While “fiduciary” is not defined by law nor by the Senate Rules, the Senate Ethics Manual notes the restrictions “were intended to limit the practice of law, medicine, engineering, architecture, service as a real estate or insurance agent or consultant, ‘and similar types of activities.’”²⁷

Mr. Dunn became a Senate employee on March 3, 2025. His New Filer PFD and 2025 Annual PFD make clear that he was compensated by Statehouse, where he held the role of “consultant,” *after* beginning his Senate service. Thus, it appears that Mr. Dunn violated Senate Rule 37(5)(a) by performing paid professional services – in the form of consulting – for an outside lobbying and governmental affairs firm.

In addition, to the extent that Statehouse’s services – especially lobbying, government affairs, procurement consulting, and policy counsel – qualify as professional services involving a fiduciary relationship, Senate Rule 37(5)(b) would also prohibit Mr. Dunn from accepting *any* compensation from Statehouse, regardless of his role, while he is an employee of the Senate. Since he received at least \$20,000 in compensation from Statehouse *after* becoming a Senate employee, Mr. Dunn also appears to have violated Senate Rule 37(5)(b).

Worse, Senate Rule 37(3) required Mr. Dunn to notify his supervisor of his outside activities so that the supervisor could “take such action as he considers necessary for the avoidance of conflict of interest or interference with duties to the Senate.”²⁸ Thus, beyond Mr. Dunn’s own apparent violations, there is reason to believe that Senator Husted himself failed to meet his obligations under Senate Rules to protect his constituents from the damage inflicted by a clear conflict of interest. Instead of focusing only on serving the voters of Ohio, Mr. Husted’s office was apparently also serving the interests of big tech, pharma and tobacco.

²³ *Id.* (emphasis added).

²⁴ Senate Rule 37(5)(b) imposes stricter restrictions on staff whose annualized rate of pay is at or above 120% of the GS-15 level (\$150,160 for CY 2025). Mr. Dunn’s 2025 compensation exceeded this threshold.

²⁵ Senate Ethics Manual at 71-72. Such staffers are also prohibited from (1) permitting their names to be used by a firm, partnership, association, corporation, or other entity which provides professional services involving a fiduciary relationship, (2) receiving compensation for serving as an officer or board member of any association, corporation, or entity, and (3) receiving compensation for teaching without the Committee’s advanced approval. 5 U.S.C. § 13144.

²⁶ *Id.* at 71 (emphasis in original).

²⁷ *Id.* at 72. The Senate Ethics Manual also provides that “fiduciary” is “a term generally denoting an obligation to act in another person’s best interests or for that person’s benefit, or a relationship of trust in which one relies on the integrity, fidelity, and judgment of another.” *Id.*

²⁸ Senate Rule 37(3). *See also* Senate Rules Interpretive Ruling No. 97.

III. Request for Action

I respectfully request that you commence an immediate investigation to determine whether Mr. Dunn received compensation from Statehouse Impact Group LLC while he was employed in Senator Husted's office in violation of Senate Rules. Further, you should investigate whether Senator Husted knew of such conflict of interest and failed to take steps to prevent it. An investigation is necessary to ensure Mr. Dunn complies with Senate Rules and to assure the citizens of Ohio that the office of their U.S. Senator is not acting for private gain. I request that you take all appropriate disciplinary action.

I understand that 18 U.S.C. § 1001 applies to the information I am providing. To the best of my knowledge and ability, all evidence submitted was not obtained in violation of any law, rule, or regulation.

Sincerely,

A handwritten signature in cursive script that reads "Anne Griffin".

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