



September 25, 2020

Iowa Ethics and Campaign Finance Disclosure Board  
510 E. 12<sup>th</sup> Street, Suite 1A  
Des Moines, IA 50319

To Whom It May Concern:

Grant Veeder is the Black Hawk County Auditor and County Commissioner of Elections. He is using his official position and public resources for personal benefit and to campaign for public office in violation of Iowa law. This complaint will list three examples, but they are not necessarily isolated instances and show a pattern of disregard for the law and the office by Auditor Veeder with the intention of obtaining personal benefit from county resources.

The first issue is that "Grant Veeder – Black Hawk County Auditor" Facebook page being used by Auditor Veeder for his campaign has been designed to mimic and appear like an official Facebook page for the office of Black Hawk County Auditor. It does not clearly identify itself as a campaign page by using the word "for" or some other indication that it is not the official Facebook page of an office holder typically seen on other incumbents' campaigns' Facebook pages. In fact, the very URL that links to the page (i.e., <https://www.facebook.com/AuditorGrantVeeder>) is designed to identify it as an official Facebook page. This blurs the line between Auditor Veeder's roles as the current Black Hawk County Auditor and as an individual seeking election to that office.

Second, the most recent post to this official-looking Facebook page as of the time of writing this complaint, was one made Thursday, September 24, 2020, that includes a photograph of Auditor Veeder standing next to his campaign signs and encouraging readers to contact his campaign to donate and receive signs. Given that this Facebook page mimics an official Facebook page for the office of Black Hawk County Auditor, this is an improper use of his office for personal gain.

The third and final issue in the complaint is a video Auditor Veeder posted to his official-looking Facebook page Tuesday, September 22, 2020. The URL for that video is: <https://www.facebook.com/AuditorGrantVeeder/videos/338177490715976>.

Auditor Veeder claims this video was created on private property and using private resources; however, Auditor Veeder begins this video holding himself out as educating voters in his official capacity as County Auditor, but quickly turns it into a campaign advertisement by making a number of statements in the video that go beyond blurring the line between his official position and his private campaign activities, rather, he charges across that line while holding himself out in his official position.

Iowa Code section 68B.2A is the governmental ethics statute that prohibits public officials such as Auditor Veeder from engaging in impermissible conflicts of interest. Specifically, Iowa Code Sections 68A.2A(1)(a) and (c) provide, in pertinent part, the following:

1. Any person who serves or is employed by the state or a political subdivision of the state shall not engage in any of the following conduct:

a. Outside employment or an activity that involves the use of the ... political subdivision's time, facilities, equipment, and supplies or the use of the ... political subdivision badge, uniform, business card, or other evidences of office or employment to give the person or member of the person's immediate family an advantage or pecuniary benefit that is not available to other similarly situated members or classes of members of the general public ....

....  
c. Outside employment or an activity that is subject to the official control, inspection, review, audit, or enforcement authority of the person, during the performance of the person's duties of office or employment.

The issues of the poorly created Facebook page can be easily corrected to take the steps that other reasonable incumbents running for office take in the ordinary course of business. Auditor Veeder needs to make clear by the name of the page and other verbiage and images on the page that it is a campaign page, not an official page for the Black Hawk County Auditor.

If the issue of the Facebook page is corrected, then the issue of posting for donations and campaign signs probably resolves itself. If it is clear to the reader that it is a campaign page and not an official county page, then Auditor Veeder would not appear to the public to be using his official position for illegal personal gain.

The video is another matter that is not so easily resolved. Auditor Veeder clearly "expressly advocates" for his own campaign, those of other Democratic candidates, and against President Trump. He also makes a number of statements related to his work as County Auditor and County Commissioner of Elections. Auditor Veeder provides the official phone number of the Auditor's election office. Viewers are told to send him their questions to him through the Facebook page or the election office. He also describes how his job is to assist with voting and references official government forms that are available in his office. In all of this, he is unquestionably holding himself out to the public in his official capacity as the Black Hawk County Auditor, while at that same time campaigning for himself and other candidates of a specific political party.

Clearly this conduct is using "evidences of office" and is providing Auditor Veeder "an advantage" that is not available to other candidates. It is also impossible to tell where "Auditor Veeder" ends and where "private sector Veeder" begins.

The Iowa Ethics and Campaign Disclosure Board should investigate this matter fully and determine whether or not Auditor Veeder has engaged in conduct that results in a conflict of interest as prohibited by Iowa Code section 68B.2A.

Sincerely,



William R. Gustoff

Enc. (Complaint Form)