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is above the law!*

April 24, 2009

The Honorable Barbara Boxer, Chairman  
The Honorable Johnny Isakson, Vice Chairman  
The Honorable Mark L. Pryor, Member  
The Honorable Sherrod Brown, Member  
The Honorable Pat Roberts, Member  
The Honorable James E. Risch, Member  
United States Senate Select Committee on Ethics  
220 Hart Senate Office Building  
Washington, DC 20510

**Re: Ethics Complaint Against Senator Christopher J. Dodd**

Dear Senators:

Judicial Watch, Inc. is a non-profit educational foundation that is dedicated to promoting transparency, integrity, and accountability in government and fidelity to the rule of law. Judicial Watch, which has over 600,000 supporters, has a fifteen-year record of combatting government corruption.

Judicial Watch, in the public interest, hereby files this formal complaint, under the provisions of the Senate Ethics Manual, Appendix C (Rules of Procedure, Senate Ethics Committee), Part II (Supplementary Procedural Rules), Rule 2 (Procedures for Complaints, Allegations or Information), against Senator Christopher J. Dodd of Connecticut for improper conduct that reflects upon the U.S. Senate and the general principles of public service (See Senate Ethics Manual, Appendix E).

This complaint concerns recent media reports alleging Senator Christopher Dodd used his position and influence as a United States Senator to intervene on behalf of his longtime friend and business associate, Edward Downe Jr. Senator Dodd is then alleged to have benefited financially as a result of his intervention, and failed to disclose the financial benefits by filing inaccurate Senate Financial Disclosure Statements from 2002 through at least 2007. (The Senate Financial Disclosure Statement for 2008 has not as yet been filed and is not due until May 15, 2009.)

In 1993, Senator Dodd reportedly helped to reduce Edward Downe Jr.'s criminal penalty for violating tax and securities laws by appearing at Downe's sentencing in federal court. In 2001, avoiding normal pardon vetting procedures, Senator Dodd helped secure a full presidential pardon for Downe on President Clinton's last day in office.

Further, it appears that Senator Dodd may have failed to report the financial benefit he received as a result of his interventions.<sup>1</sup>

More specifically, Senator Dodd appears to have failed to report a gift he received in 2002 in the form of a significantly reduced sales price for two-thirds interest of a property in County Galway, Ireland. (Senator Dodd already held a one-third interest in the same property.)<sup>2</sup> Dodd purchased the two-thirds interest from co-owner William Kessinger, an associate of Mr. Downe. Further, according to Senator Dodd's Annual Financial Disclosure Statements filed between 2002 and 2007, he has continued to file seemingly inaccurate reports concerning the true value of his County Galway, Ireland, property—in violation of the Ethics in Government Act of 1978, as amended, and federal law.<sup>3, 4</sup>

The Senate Ethics Manual requires “a good faith estimate of fair market value” if a disclosed property is held for “investment or the production of income” and is worth over \$1,000 and cannot be determined by seven specific options. And it further provides that “the filer must value assets as of any date that is within 31 days of the close of the reporting period” (emphasis in original). The Senate Ethics Manual further requires the disclosure of all gifts by Members of the Senate in annual financial statements, “including the donor, description and value of all gifts aggregating \$250 or more from a single source in a single year”—whether or not the gifts are acceptable:

The fact that a gift must be disclosed under the Ethics in Government Act (Senate Rule 34) has no bearing on whether the gift may be accepted under the Gifts Rule (Senate Rule 34). In other words, disclosing acceptance of a gift does not mean that the gift was necessarily acceptable.<sup>5</sup>

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<sup>1</sup> See Exhibit 1, Christopher Keating and Kevin Rennie, “Questions Raised About Dodd's Cottage in Ireland,” February 23, 2009, <[http://blogs.courant.com/capitol\\_watch/2009/02/questions-raised-about-dodds-c.html](http://blogs.courant.com/capitol_watch/2009/02/questions-raised-about-dodds-c.html)>.

<sup>2</sup> *Senate Ethics Manual, Select Committee on Ethics, United States Senate, 108<sup>th</sup> Congress, 1<sup>st</sup> Session, 2003 Edition*, “The Gifts Rule,” pp. 22 and 23 <<http://ethics.senate.gov/downloads/pdf/files/manual.pdf>>.

<sup>3</sup> See Exhibit 2, Summary of Christopher J. Dodd's U.S. Senate Public Financial Disclosure Reports FYs 1995, 1996, and 2001-2007.

<sup>4</sup> See 5 U.S.C. app. 6, 104, and 18 U.S.C. 1001.

<sup>5</sup> *Senate Ethics Manual, Select Committee on Ethics, United States Senate, 108<sup>th</sup> Congress, 2003 Edition*, Chapter 5, Financial Disclosure, Rule 34, “The Disclosure Report Form,” **Parts IIIA and IIIB: Assets and Unearned Income Sources**, p. 129 <<http://ethics.senate.gov/downloads/pdf/files/manual.pdf>>.

Defining Value: Filers have seven options to determine value -

1. recent appraisal of asset; . . .

In 1993, Senator Dodd appeared in federal court on Downe's behalf. The following year, in 1994, Dodd reportedly obtained a one-third interest in property located in an affluent section of County Galway, Ireland. The remaining two-thirds interest was held by Downe's friend William Kessinger. According to the *Hartford Courant*:

The Irish land registry isn't open to the public in the manner of the American system. It probably appeared unlikely that anyone would discover the curious appearance of Downe's nearly illegible signature as the witness to Kessinger's signing the official transfer document. Downe, convicted, on probation and banned for life from the securities business, described himself as "private investor" on the document and included his New York address.<sup>6</sup>

In 1994, the same year Senator Dodd obtained his one-third interest in the Irish property, Galway County Council Planning & Development records indicate that Dodd received approval for alterations and an extension to the cottage to include a new terrace, sun-lounge and utility bath, along with a new sliding door, fireplace, and chimney in the connecting studio, at a cost of approximately \$14,000. The application form lists Christopher Dodd and William Kessinger as "Owners" of this property.<sup>7</sup>

In 1998, Senator Dodd submitted an application to the Galway County Council for the development of a house and septic tank on 1.3 acres of the existing property, which was ultimately denied. The Galway County Council Planning Enquiry and Registration of Application documents list Dodd as "Owner." There is no mention of William Kessinger in the more than thirty-pages of documents on file with the planning commission for this application.<sup>8</sup>

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6. for real estate—where the value is not ascertainable without an appraisal, (a) the assessed value for tax purposes adjusted to reflect current market value if the assessment is computed at less than 100% of current value (with this option, the filer must describe the method used to determine this value and list the actual and not the category of amount); or (b) the actual purchase price of the real property and the date of purchase (but both should be listed on the report form).

7. any other recognized indication of value (filer must describe the method of determination of value).

<sup>6</sup> See Exhibit 3, Kevin Rennie, "Dodd's 'Cottage': A Cozy Purchase," *Courant.com*, February 22, 2009 <[http://www.courant.com/news/opinion/op\\_ed/hc-rennie0222.artfeb22.0.1084534.print.column](http://www.courant.com/news/opinion/op_ed/hc-rennie0222.artfeb22.0.1084534.print.column)>.

<sup>7</sup> See Exhibit 4, Galway County Council, Registration of Application, "Electronic Documents on file for Planning Reference No. 0070793," <<http://apps.galwaycoco.ie/planningenquiry/MainFrames.aspx>>.

<sup>8</sup> See Exhibit 5, Galway County Council Planning Application Form, filed by Mr. Chris Dodd on April 14, 1998; and May 5, 1998 letter from Niall J. Kearns & Co. Architects, to Galway County Council re "Application to construct dwelling house with proprietary effluent Treatment System in Inishee, Roundstone, Co. Galway"; Galway County Council, Registration of Application, "Electronic Documents

In 2002—the year after Senator Dodd secured a full presidential pardon on behalf of Edward Downe Jr.—Dodd purchased the remaining two-thirds interest in the County Galway, Ireland, property from Kessinger at a price just slightly higher than the original purchase price a full eight years before. Irish property records reportedly show Senator Dodd purchased the final two-thirds interest for \$122,351.<sup>9</sup>

The full purchase price of the house and land in 1994 was reportedly \$160,000.<sup>10</sup>

The U.S. Senate Financial Disclosure Reports for Annual and Termination Reports for years 2002 through 2007 list the Irish property, under Block B, “Valuation of Assets,” at between \$100,001 and \$250,000, with the parenthetical “value based on appraisal at time of purchase” inserted in Block A for FYs 2006 and 2007, only.<sup>11</sup> The 2002 bank appraisal obtained by Senator Dodd for purchase of the remaining two-thirds interest of the Irish property seems not to have reflected the property’s current value. The *Hartford Courant* reported that the 2002 appraisal was “slightly more than its value eight eventful years before, but much less than what might have been expected given the explosion of Irish real estate prices.”<sup>12</sup>

The property’s current value is likely much higher, as the Central Bank of Ireland stated that between 1994 and 2004 prices of existing homes nearly quadrupled.<sup>13</sup> Further, a report by the *Telegraph.co.uk* estimated that in today’s market, Senator Dodd’s almost ten acres of land and Irish cottage is worth somewhere “approaching \$1 million, and very possibly much more than that.”<sup>14</sup>

It is likely that the Irish property, which may be valued today at over \$1 million, was worth over \$480,000 in 2002. However, Kessinger’s two-thirds interest of the property was purchased by Dodd in 2002 for \$122,351. The purchase price of \$122,351 is probably far less than the actual value of Kessinger’s share of the property. Disguising

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on file for Planning Reference No. 981287,” <<http://apps.galwaycoco.ie/planningenquiry/MainFrames.aspx>>.

<sup>9</sup> See Exhibit 1, Keating and Rennie, “Questions Raised About Dodd’s Cottage in Ireland.”

<sup>10</sup> *Id.*

<sup>11</sup> See Exhibit 2, Summary of Christopher J. Dodd’s U.S. Senate Public Financial Disclosure Reports FYs 1995, 1996, and 2001-2007.

<sup>12</sup> See Exhibit 1, Keating and Rennie, “Questions Raised About Dodd’s Cottage in Ireland.”

<sup>13</sup> *Id.*

<sup>14</sup> See Exhibit 6, Toby Harnden, *Telegraph.co.uk*, “How politics works: Senator Christopher Dodd and his cosy Irish cottage,” February 24, 2009 <[http://blogs.telegraph.co.uk/toby\\_harnden/blog/2009/02/24/how\\_politics\\_works\\_senator\\_christopher\\_dodd\\_and\\_his\\_cosy\\_irish\\_cottage](http://blogs.telegraph.co.uk/toby_harnden/blog/2009/02/24/how_politics_works_senator_christopher_dodd_and_his_cosy_irish_cottage)>.

this gift would provide a motive for Senator Dodd to fail to report the property's true value on his Financial Disclosure Statements since 2002.<sup>15</sup>

A primary purpose of the yearly Financial Disclosure Forms is to disclose, monitor, and deter conflicts of interest, thereby maintaining public confidence in the integrity of the United States Senate and its Members. Because the yearly Financial Disclosure Forms require public disclosure of financial information by each Member of the United States Senate, such as income, assets, gifts, financial interests, and liabilities, the Forms provide the public at large, including the voters of a particular state, with the information necessary to allow the public to evaluate and consider official conduct by a Member of the United States Senate in light of that Member's private finances.

By all appearances, Senator Dodd used his position and influence as a United States Senator to intervene on behalf of his friend and convicted felon, Edward Downe Jr., and received in turn a significant discount in the purchase of property in 2002. Further, it appears Senator Dodd failed to report this gift on his annual Senate Financial Disclosure Form, as required by law, and may have falsified his reports in the years following the full acquisition of the Irish property by failing to accurately report the value of his holdings.<sup>16</sup>

The Senate Ethics Manual states, in relevant part:

The financial disclosure provisions of the Ethics in Government Act have been incorporated as Senate Rule 34, over which the Committee has jurisdiction. In addition to any Committee action, the Ethics in Government Act authorizes the Attorney General of the United States to seek a civil penalty of up to \$11,000 against an individual who knowingly and willfully falsifies or fails to file or to report any required information. Moreover, anyone who knowingly and willfully falsifies or conceals any material fact in a statement to the Government may be fined up to \$11,000 and is subject to criminal prosecution.<sup>17</sup>

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<sup>15</sup> If existing homes in Ireland had quadrupled in value between 1994 and 2004, it is reasonable to believe the County Galway, Ireland, property purchased in 1994 for \$160,000, may have tripled in value by 2002 ( $\$160,000 \times 3 = \$480,000$ ), with the two-thirds interest held by Kessinger worth \$320,000 ( $2/3$  of  $\$480,000 = \$320,000$ ). Senator Dodd purchased Kessinger's two-thirds interest in 2002 for \$122,351. This would mean that Senator Dodd may have received a benefit of as much as \$197,649 ( $\$320,000 - \$122,351 = \$197,649$ ).

<sup>16</sup> See 18 U.S.C. 1001, and 18 U.S.C. 3571.

<sup>17</sup> *Senate Ethics Manual, Select Committee on Ethics, United States Senate*, 108<sup>th</sup> Congress, 1<sup>st</sup> Session, 2003 Edition, Chapter 5: Financial Disclosure, *Rule 34, subsection C*. "Failure to File or Filing False Disclosure Statements," page 127 [<http://ethics.senate.gov/downloads/pdf/files/manual.pdf>].

The Honest Leadership and Open Government Act of 2007, which became law September 14, 2007, increased the penalty for “falsifying . . . financial disclosure forms from \$10,000 to \$50,000 and establishes criminal penalties of up to one year of imprisonment.”<sup>18</sup>

Certain details concerning Dodd’s co-ownership of a Washington, DC, condominium with Edward Downe Jr. in the 1980s are just now surfacing. In light of the potential improprieties of Dodd’s Irish land purchase, we believe Senator Dodd’s financial disclosure reports filed with the Senate during that time period may also be worth examining.<sup>19</sup>

As chairman of the Senate Banking, Housing and Urban Affairs Committee, Senator Christopher Dodd has a lead role in the oversight of the banking and finance industries involving trillions of dollars. His decisions impact every single American citizen. If Senator Dodd has violated the public’s trust by unlawful and corrupt conduct, he must be held accountable. The Senate Ethics Manual sets forth the duty of this Committee regarding these allegations and the importance of maintaining the public trust as discussed under the “General Principles of Public Service.”

[It is] the duty of the Select Committee to—“receive complaints and investigate allegations of improper conduct which may reflect upon the Senate, violations of law, violations of the Senate Code of Official Conduct, and violations of rules and regulations of the Senate, relating to the conduct of individuals in the performance of their duties as Members of the Senate, or as officers or employees of the Senate, and to make appropriate findings of fact and conclusions with respect thereto . . . .”<sup>20</sup>

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<sup>18</sup> Senate Republican Policy Committee, *Legislative Notice*, No. 26, August 2, 2007, “S.1 – Honest Leadership and Open Government Act of 2007 (with House Amendment),” p. 9 <<http://rpc.senate.gov/public/ files/L26S1HonestLeadershipOpenGovt080207CJ.pdf>>.

<sup>19</sup> See Exhibit 7, David Altamari and Matthew Kauffman, “GOP Chairman Criticizes Dodd Real Estate Deal, *Courant.com*, March 10, 2009 <<http://www.courant.com/news/politics/he-dodd0310.artmar10.0.4641659.story>>. Dodd and Downe shared an interest in the purchase of a Washington, DC, condominium in the 1980s. Downe sold Dodd his interest in the Washington condominium three and a half years after its purchase for reportedly \$98,000. According to land records, the original purchase price was reported to be \$159,800, but there is no indication what portion Dodd initially paid.

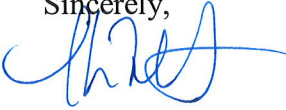
<sup>20</sup> *Senate Ethics Manual, Select Committee on Ethics, United States Senate*, 108<sup>th</sup> Congress, 1<sup>st</sup> Session, 2003 Edition, Appendix E, “Improper Conduct Reflecting Upon the Senate And General Principles of Public Service,” p. 432 [<http://ethics.senate.gov/downloads/pdf/files/manual.pdf>].

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Accordingly, Judicial Watch requests a full investigation of Senator Dodd's financial disclosure filings as they relate to his real estate and other dealings with Edward R. Downe Jr. and William Kessinger.

Thank you for your prompt attention to this matter.

Sincerely,



Thomas Fitton  
President

Enclosures

By: Fax (w/o Exhibits) and Mail

cc: Honorable Nancy Erikson,  
Secretary of the Senate

## **EXHIBIT 1**



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By CHRISTOPHER KEATING

## Questions Raised About Dodd's Cottage in Ireland

By Christopher Keating on February 23, 2009 7:32 AM | [Permalink](#) | [Comments \(10\)](#) [SHARE](#) [Facebook](#) [Twitter](#) [LinkedIn](#)

Hartford Courant columnist [Kevin Rennie](#) is raising questions about U.S. Senator Christopher Dodd's purchase of a one-third share of a cottage in Ireland in 1994 and his subsequent takeover of the entire cottage years later.

Dodd is dismissing the questions as being part of the political season for the 2010 Senatorial election, which is already starting to heat up.

[Rennie reports](#) the following:

"Ireland does not easily give up its secrets. That may have been one attraction it held for Sen. Christopher Dodd in 1994 when he became an owner of a refuge on nearly 10 acres on the Irish west coast. The murky tale includes a felonious inside trader, a Kansas City businessman, a presidential pardon and what appears to be a financial bonanza to Dodd during the Irish property boom.

"The saga of Dodd's lucrative Irish odyssey reveals that his two 2003 sweetheart loans from subprime mortgage titan Countrywide Financial were not the first time he enjoyed a financial advantage from a wealthy benefactor. The trail begins at one of New York's most desirable addresses.

"In 1993, Dodd's close friend, New York bon vivant Edward R. Downe Jr., got a heaping helping of justice when his insider trader scheme caused him to plead guilty to violating tax and securities laws. Downe, who lived at exclusive 25 Sutton Place on the Upper East Side with his then wife, heiress Charlotte Ford, was nabbed setting up foreign accounts to make illegal insider stock trades for himself and some socialite friends. Dodd attended Downe's sentencing, where the schemer received three years' probation and 3,000 hours of community service. Downe agreed a year later to pay \$11 million to the SEC.

"While Downe fought the SEC in 1994 about paying the penalty, Dodd and William Kessinger of Kansas City, Mo., whom Dodd knew through Downe, purchased a house and nearly 10 acres (4 hectares in local parlance) on the island of Inishnee in the affluent Roundtree section of Connemara, in County Galway, Ireland, for \$160,000."

Rennie continued:

"In 1996, the Irish mortgage needed to be paid, and it was. A new mortgage was obtained, according to Dodd, for the same amount. He has reported collecting rent in ranges from \$201 to \$15,000 on his Senate ethics filings, though the names of the people who rented are not disclosed. Through 2001, Dodd declared his interest in the Irish property as worth between \$50,001 and \$100,000.

"In 2001, Dodd did the favor of a lifetime for his pal, Downe. The veteran senator circumvented the normal Department of Justice vetting process and got Downe a full pardon from President Bill Clinton on his last day in office. Dodd initiated the pardon request and included in his two-page letter to Clinton the tidbit that he speaks to Downe nearly every day.

"Buddies Downe and Dodd probably mentioned the Irish property now and then in their frequent surveys of the world's highs and lows. While they were speaking daily, real estate prices in Ireland were exploding.

"Between 1994 and 2004, according to the Central Bank of Ireland, prices of existing homes (as

### ABOUT

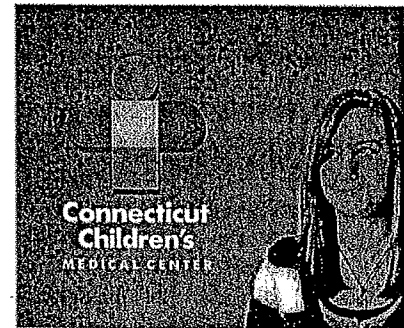
*Christopher Keating has been The Courant's Capitol bureau chief for 11 of the past 13 years, covering the administrations of Governors Lowell P. Weicker, ... [read more](#)*

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opposed to new ones) nearly quadrupled. But not according to a 2002 bank appraisal that Dodd used in the purchase of Kessinger's interest.

"That year, a year after Dodd obtained a pardon for Downe, Dodd purchased Kessinger's two-thirds interest in the Irish hideaway for only \$127,000, according to Dodd. Irish property records obtained for this story show it as \$122,351. That was slightly more than its value eight eventful years before, but much less than what might have been expected given the explosion of Irish real estate prices."

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## EXHIBIT 2

**Summary of Christopher J. Dodd's  
U.S. Senate Public Financial Disclosure Reports  
FYs 1995, 1996 and 2001-2007**

**PART VII. LIABILITIES**

<b>YEAR</b>	<b>Name of Creditor</b>	<b>Address of Creditor</b>	<b>Type of Liability</b>	<b>Date Incurred</b>	<b>Interest Term</b>	<b>Value</b>
1995	KILCARTROM PROPERTIES	Waterford, Ireland	MORTGAGE ON COTTAGE	1994	5%      July 1996	\$100,001- \$250,000

**PART IIIB. NON-PUBLICLY TRADED ASSETS AND UNEARNED INCOME SOURCES**

<b>BLOCK A IDENTITY</b>	<b>BLOCK B VALUATION OF ASSET</b>	<b>BLOCK C TYPE AND AMOUNT OF INCOME</b>
Cottage –County Galway Ireland – 1/3 Interest	\$50,001 - \$100,000	Rent                      \$201 -\$1,000

**PART VII. LIABILITIES**

<b>YEAR</b>	<b>Name of Creditor</b>	<b>Address of Creditor</b>	<b>Type of Liability</b>	<b>Date Incurred</b>	<b>Interest Term</b>	<b>Value</b>
1996	EBS BUILDING SOCIETY (Re-financing of existing mortgage)	Dublin, Ireland	MORTGAGE ON COTTAGE	1996	6.6%    15 yrs	\$15,001-\$50,000

**PART IIIB. NON-PUBLICLY TRADED ASSETS AND UNEARNED INCOME SOURCES**

<b>BLOCK A IDENTITY</b>	<b>BLOCK B VALUATION OF ASSET</b>	<b>BLOCK C TYPE AND AMOUNT OF INCOME</b>
Cottage –County Galway Ireland – 1/3 Interest	\$50,001 - \$100,000	Rent                      \$2,501 -\$5,000

**PART VII. LIABILITIES**

<b>YEAR</b>	<b>Name of Creditor</b>	<b>Address of Creditor</b>	<b>Type of Liability</b>	<b>Date Incurred</b>	<b>Interest Term</b>	<b>Value</b>
2001	EBS Building Society	Dublin, Ireland	Variable Rate on Mortgage	1996	5.5%    15 yrs	\$15,001-\$50,000

**PART IIIB. NON-PUBLICLY TRADED ASSETS AND UNEARNED INCOME SOURCES**

<b>BLOCK A IDENTITY</b>	<b>BLOCK B VALUATION OF ASSET</b>	<b>BLOCK C TYPE AND AMOUNT OF INCOME</b>
Cottage –County Galway Ireland – 1/3 Interest	\$50,001 - \$100,000	Rent                      \$1,001 -\$2,500

**Summary of Christopher J. Dodd's  
U.S. Senate Public Financial Disclosure Reports  
FYs 1995, 1996 and 2001-2007**

**PART VII. LIABILITIES**

<b>YEAR</b>	<b>Name of Creditor</b>	<b>Address of Creditor</b>	<b>Type of Liability</b>	<b>Date Incurred</b>	<b>Interest Term</b>	<b>Value</b>
2002	EBS Building Society	Dublin, Ireland	Variable Rate on Mortgage (paid off July 2002)	1996	5.5% 15 yrs	\$15,001-\$50,000
	AIB	Dublin, Ireland	Variable Rate Mortgage on Cottage	2002	3.85% 20 yrs	\$100,001-\$250,000

**PART IIIB. NON-PUBLICLY TRADED ASSETS AND UNEARNED INCOME SOURCES**

<b>BLOCK A IDENTITY</b>	<b>BLOCK B VALUATION OF ASSET</b>	<b>BLOCK C TYPE AND AMOUNT OF INCOME</b>
Cottage –County Galway, Ireland	\$100,001 - \$250,000	Rent \$2,501 -\$5,000

**PART VII. LIABILITIES**

<b>YEAR</b>	<b>Name of Creditor</b>	<b>Address of Creditor</b>	<b>Type of Liability</b>	<b>Date Incurred</b>	<b>Interest Term</b>	<b>Value</b>
2003	AIB	Dublin, Ireland	Variable Rate Mortgage on Cottage	2002	3.85% 20 yrs	\$100,001-\$250,000

**PART IIIB. NON-PUBLICLY TRADED ASSETS AND UNEARNED INCOME SOURCES**

<b>BLOCK A IDENTITY</b>	<b>BLOCK B VALUATION OF ASSET</b>	<b>BLOCK C TYPE AND AMOUNT OF INCOME</b>
Cottage –County Galway Ireland (J)	\$100,001 - \$250,000	Rent \$5,001 - \$15,000

**PART VII. LIABILITIES**

<b>YEAR</b>	<b>Name of Creditor</b>	<b>Address of Creditor</b>	<b>Type of Liability</b>	<b>Date Incurred</b>	<b>Interest Term</b>	<b>Value</b>
2004	AIB	Dublin, Ireland	Variable Rate Mortgage on Cottage	2002	3.30% 20 yrs	\$100,001-\$250,000

**PART IIIB. NON-PUBLICLY TRADED ASSETS AND UNEARNED INCOME SOURCES**

<b>BLOCK A IDENTITY</b>	<b>BLOCK B VALUATION OF ASSET</b>	<b>BLOCK C TYPE AND AMOUNT OF INCOME</b>
Cottage –County Galway, Ireland (J)	\$100,001 - \$250,000	Rent \$201 - \$1,000

**Summary of Christopher J. Dodd's  
U.S. Senate Public Financial Disclosure Reports  
FYs 1995, 1996 and 2001-2007**

**PART VII. LIABILITIES**

YEAR	Name of Creditor	Address of Creditor	Type of Liability	Date Incurred	Interest Term	Value
2005	AIB (J)	Dublin, Ireland	Variable Rate Mortgage on Cottage	2002	3.30% 20 yrs	\$100,001-\$250,000

**PART IIIB. NON-PUBLICLY TRADED ASSETS AND UNEARNED INCOME SOURCES**

BLOCK A IDENTITY	BLOCK B VALUATION OF ASSET	BLOCK C TYPE AND	AMOUNT OF INCOME
Cottage –County Galway, Ireland (J)	\$100,001 - \$250,000	Rent	\$2,501 - \$5,000

**PART VII. LIABILITIES**

YEAR	Name of Creditor	Address of Creditor	Type of Liability	Date Incurred	Interest Term	Value
2006	AIB (J)	Dublin, Ireland	Variable Rate Mortgage on Cottage	2002	4.6% 20 yrs	\$100,001-\$250,000

**PART IIIB. NON-PUBLICLY TRADED ASSETS AND UNEARNED INCOME SOURCES**

BLOCK A IDENTITY	BLOCK B VALUATION OF ASSET	BLOCK C TYPE AND	AMOUNT OF INCOME
Cottage –County Galway Ireland (J) (value based on appraisal at time of purchase)	\$100,001 - \$250,000	Rent	\$5,001 - \$15,000

**PART VII. LIABILITIES**

YEAR	Name of Creditor	Address of Creditor	Type of Liability	Date Incurred	Interest Term	Value
2007	AIB (J)	Dublin, Ireland	Variable Rate Mortgage on Cottage	2002	5.1% 20 yrs	\$100,001-\$250,000

**PART IIIB. NON-PUBLICLY TRADED ASSETS AND UNEARNED INCOME SOURCES**

BLOCK A IDENTITY	BLOCK B VALUATION OF ASSET	BLOCK C TYPE AND	AMOUNT OF INCOME
Cottage –Cnty Galway, Ireland (J) Value based on appraisal at time of purchase)	\$100,001 - \$250,000	Rent	\$5,001 - \$15,000

### **EXHIBIT 3**

courant.com/news/opinion/op\_ed/hc-rennie0222.artfeb22,0,4471645.column

## Courant.com

### Dodd's 'Cottage': A Cozy Purchase

Kevin Rennie

NOW YOU KNOW

February 22, 2009

Ireland does not easily give up its secrets. That may have been one attraction it held for Sen. Christopher Dodd in 1994 when he became an owner of a refuge on nearly 10 acres on the Irish west coast. The murky tale includes a felonious inside trader, a Kansas City businessman, a presidential pardon and what appears to be a financial bonanza to Dodd during the Irish property boom.

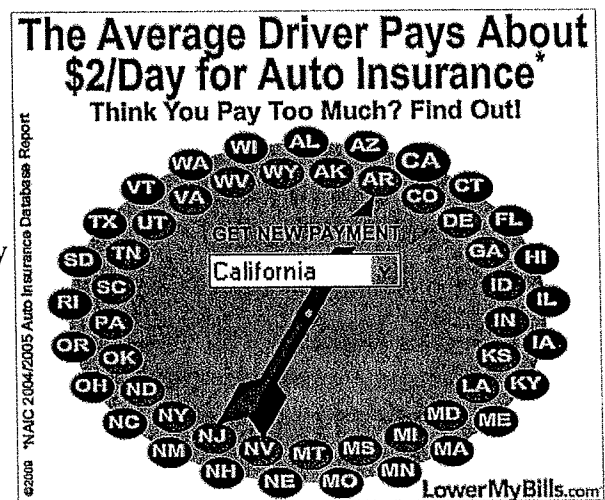
The saga of Dodd's lucrative Irish odyssey reveals that his two 2003 sweetheart loans from subprime mortgage titan Countrywide Financial were not the first time he enjoyed a financial advantage from a wealthy benefactor. The trail begins at one of New York's most desirable addresses.

In 1993, Dodd's close friend, New York bon vivant Edward R. Downe Jr., got a heaping helping of justice when his insider trader scheme caused him to plead guilty to violating tax and securities laws. Downe, who lived at exclusive 25 Sutton Place on the Upper East Side with his then wife, heiress Charlotte Ford, was nabbed setting up foreign accounts to make illegal insider stock trades for himself and some socialite friends. Dodd attended Downe's sentencing, where the schemer received three years' probation and 3,000 hours of community service. Downe agreed a year later to pay \$11 million to the SEC.

While Downe fought the SEC in 1994 about paying the penalty, Dodd and William Kessinger of Kansas City, Mo., whom Dodd knew through Downe, purchased a house and nearly 10 acres (4 hectares in local parlance) on the island of Inishnee in the affluent Roundtree section of Connemara, in County Galway, Ireland, for \$160,000.

Kessinger and Downe have a history as business partners in a Missouri real estate investment company.

Dodd, who says he contributed \$12,000 to the purchase price, owned one-third of the house, Kessinger two-thirds. They purchased the property with a two-year mortgage from the seller of the property that was, according to Dodd's Senate financial disclosures for both 1994 and 1995, between \$100,001 and





\$250,000.

The Irish land registry isn't open to the public in the manner of the American system. It probably appeared unlikely that anyone would discover the curious appearance of Downe's nearly illegible signature as the witness to Kessinger's signing the official transfer document. Downe, convicted, on probation and banned for life from the securities business, described himself as "private investor" on the document and included his New York address.

When Downe agreed to pay \$11 million to the SEC in 1994, he claimed he was virtually bankrupt. Six months later, he made \$2,000 in contributions to Dodd, again listing his occupation as "private investor." Must be a lot of loose change in the cushions at 25 Sutton Place, even in a "bankrupt" pauper's grand apartment.

In 1996, the Irish mortgage needed to be paid, and it was. A new mortgage was obtained, according to Dodd, for the same amount. He has reported collecting rent in ranges from \$201 to \$15,000 on his Senate ethics filings, though the names of the people who rented are not disclosed. Through 2001, Dodd declared his interest in the Irish property as worth between \$50,001 and \$100,000.

In 2001, Dodd did the favor of a lifetime for his pal, Downe. The veteran senator circumvented the normal Department of Justice vetting process and got Downe a full pardon from President Bill Clinton on his last day in office. Dodd initiated the pardon request and included in his two-page letter to Clinton the tidbit that he speaks to Downe nearly every day.

Buddies Downe and Dodd probably mentioned the Irish property now and then in their frequent surveys of the world's highs and lows. While they were speaking daily, real estate prices in Ireland were exploding.

Between 1994 and 2004, according to the Central Bank of Ireland, prices of existing homes (as opposed to new ones) nearly quadrupled. But not according to a 2002 bank appraisal that Dodd used in the purchase of Kessinger's interest.

That year, a year after Dodd obtained a pardon for Downe, Dodd purchased Kessinger's two-thirds interest in the Irish hideaway for only \$127,000, according to Dodd. Irish property records obtained for this story show it as \$122,351. That was slightly more than its value eight eventful years before, but much less than what might have been expected given the explosion of Irish real estate prices.

At the same time, Dodd financed the purchase of Kessinger's share with a 20-year variable rate mortgage from an Irish bank for approximately \$159,000 at 3.85 percent.

In his 2002 Senate financial disclosure, Dodd, who berates bankers for failing to disclose the truth about their investments, reported the value of the "cottage" as between \$100,001 and \$250,000.

So it continues through Dodd's 2007 disclosure (his most recent). However, a vague and shifty note by the senator appears in his 2006 and 2007 disclosures when he declares "value based on appraisal at time of purchase."

Senate ethics rules require the valuation of an asset be from the close of the reporting period, which is Dec. 31. Dodd's spokesman says the rules require "a good faith estimate of the dollar value," not an annual reappraisal. To make a disclosure that reflected the effect of the Irish property boom risked

unwelcome questions as Dodd began his quest for the presidency.

Someone might also have noticed that of all the affluent seaside towns in all the world, it's the one where Dodd has a home that Downe and current wife, Mary, have in the past few years have been sponsors of local events. Dodd and the Downes have even been sponsors of the same horsey Champion of Champions event in tony Roundstone. Dodd says the Downes have never stayed at or rented his house in Inishnee, nor had any financial role in it.

Now, as Dodd suffers public contempt for failing to offer a credible explanation for his dealings with Countrywide, he also faces questions about possible financial advantages gained in Ireland. U.S. Senate ethics investigators, now looking into Countrywide, should ask.

**• Kevin Rennie is a lawyer and a former Republican state legislator. His column appears Sundays in the CTOpinion section. He can be reached at [kfrennie @yahoo.com](mailto:kfrennie@yahoo.com).**

**What's your view? Make it known with a Letter to the Editor: [www.courant.com/writeletter](http://www.courant.com/writeletter)**

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## **EXHIBIT 4**

C2

GALWAY COUNTY COUNCIL



LOCAL GOVERNMENT (Planning & Development) ACTS 1983 - 1993

DECISION under SECTION 26 of ACT of 1983 (as amended)

Ref No in Planning Register: 70793

Date of Rec of Application: 14/04/1994

Mr. Christopher Dodd,  
c/o Liam Clarke,  
Sky Road,  
Clifden,  
Co. Galway.

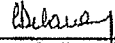
I hereby give you NOTICE that the Galway County Council has by order dated 31 MAY 1994  
decided to grant permission

to the above named, for development of land, in accordance with documents lodged,  
namely:

Extension to house in the townland of Inishnee, Kilcartron.

and subject to the conditions none set out in the Schedule hereto.

Signed this 31 MAY 1994 on behalf of Galway County Council

  
pp County Secretary

SEE ATTACHED SCHEDULE

(CONDITIONS NOS none)

---

Please see attached sheet for Important Notice regarding Planning Appeals

1201

## COMMENCEMENT NOTICE

NOTICE OF COMMENCEMENT UNDER PART II OF THE BUILDING REGULATIONS, 1991

1. COMMENCEMENT DATE of works or the making of material change of use  
8/9/94...

2. LOCATION - particulars of the location of the building to which the notice relates and the use or intended use of the building.....  
DRAILING AT KILCARTBON INISHNEE ROUNDSTONE

3. DESCRIPTION of proposed works or of material change of use  
ALTERATIONS AND EXTENSIONS TO COTTAGE.....

4. OWNER (of the building or works to which the notice relates)  
Name .. Christopher J. Dodd .. William B. Kessinger ..  
Address .. 53 Main Street .. KESSINGER HUNTER .. Tel No Senator Dodd  
East Haddam, .. 1102 Grand Avenue .. Fax No (202) 224-0353  
Connecticut 06423 .. Kansas City, Missouri 64106

5. CONTRACTOR (person who is to carry out works to which the notice relates)  
Name .. CHRISTOPHER J. DODD ..  
Address .. KILCARTBON INISHNEE ROUNDSTONE .. Tel No 74930  
Fax No ..

6. PLANS - person or persons from whom such plans, documents and information as may be necessary to show that the building or works will comply with the requirements of the Building Regulations, may be obtained  
Name ..  
Address .. Tel No ..  
Fax No ..

7. FOUNDATIONS & DRAINAGE - person or persons from whom notification may be obtained of  
(i) the pouring of any foundations, or  
(ii) the covering up of any drainage system  
Name .. CHRISTOPHER J. DODD ..  
Address .. KILCARTBON INISHNEE ROUNDSTONE .. Tel No 74930  
Fax No ..

8. Planning Permission No. 7.0793 .. Fire Safety Certificate No. ....

SIGNATURE OF OWNER (or his agent) ..

DATE 27/8/94 ..

(This notice is to be submitted not less than seven days and not more than twenty-one days before commencement of the works or the material change of use).

### OFFICE USE

Fire Safety Cert Required: ..  
Data required .. FSC No ..  
Contribution etc Payable: .. Date of Entry ..

GALWAY COUNTY COUNCIL

Box No. 17,  
Planning & Development Section,  
County Buildings,  
Prospect Hill,  
Galway.

Christopher Dodd  
40 LION CLARKE  
ST. ROAD  
CLIFDEN

DATE: 18.4.54

RE: Application for permission for extension to house  
at Clifden

Date of Receipt: 14.4.54 Planning Ref. No. 70793

Dear Sir/Madam,

I wish to acknowledge receipt of your application regarding the above which is under active consideration and a further communication will be addressed to you at the earliest possible date.

In any further communication/query with this office concerning your application, please quote the Planning Reference Number as shown above.

Yours faithfully,

J. Cowdall  
COUNTY SECRETARY

NOTE: "Provision is made in the Local Government (Planning & Development) (Fees) Regulations, 1984 for the partial refund of fees in the case of certain repeat applications where the full standard fee was paid in respect of the first application and where both applications relate to development of the same character or description and to the same site. An application for a refund must be made in writing to the Planning Authority and received by them within the period of two months beginning on the date of the Planning Authority's decision on the second application".

FILE NO. 70793

Resolution: Indirect, Rwanda force  
Amendment: Return to cottage

Site is located in Rwanda, which is zoned as an area of  
outstanding scenic beauty.

There were two previous applications relating to the site.

53320: Permission granted for alterations to house and construction  
of public toilet.

49821: Permission granted for retention of house and outbuildings.  
The present application is to bridge the gap between the cottage  
and the outbuildings (primarily a shed).

Recommendation:-

Grant Permission

No conditions.

REC	...	...
21 MAY 1994		
Signed		

R. R. R. R. R.  
21/5/94

APPLICANT'S NAME AND ADDRESS <i>W. J. Clark</i>		NOTIFICATION TO <i>A</i>		PLAN REG. NO. <b>70793</b>
DECISION DATE <i>3-6-54</i>				
APPLICATION FOR <i>Replacement of sub-standard house</i>		TOWNSHIP <i>W. J. Clark</i>		
RECEIVED ON <i>3-4-54</i>		NOTICE <i>W. J. Clark</i>		
Information supplied by Applicant	Replacement of sub-standard house <i>NO</i>	Standard Septic Tank Plans and conditions <i>NO</i>	NOTICE: <i>W. J. Clark</i>	
	New Farm House? <i>NO</i>	Public Water Supply? <i>NO</i>	Owner of site <i>W. J. Clark</i>	
	Second Family House? <i>NO</i>	Public Sewer? <i>NO</i>		
DRAFTSMAN'S REPORT MAP NO. <i>52177</i>	Class No. <i>1</i>	PREVIOUS APPLICATIONS <i>6882</i>	Reg. No. and Decision <i>6882</i>	REPORT TO Des. Eng. C.A.S. C.F.O.
DATE MAPS <i>1/1/54</i>	Art of fee <i>1/1/54</i>			
CR. FLOOR SPACE <i>1/1/54</i>	E. <i>1/1/54</i>			
SIDE WALK <i>1/1/54</i>	Dist. <i>1/1/54</i>			
TO EXIST. BTL. <i>1/1/54</i>		SPECIFIC QUERIES:-		
GRANT <input checked="" type="checkbox"/> Is recommended subject to the following conditions for the reasons stated:-		Is demolition of existing building involved?		
REUSE <input type="checkbox"/>		0 3, 1/1/54 1954		
GREEN CHARTER <i>High Green Charter</i>		Is notice O.K.?		
		Recommended Building Size		
		Recommended Road Improvement		
		Recommended Assessment of Front Boundary		
		Ref. No. of any adjacent Nat. Monuments		
		Ref. No. of any adjacent Scientific Site		
		Adjacent to Road No.		
		Adjacent to Public Water Supply		
		Adjacent to Public Sewer		
		Overly Requirement		
Latest Date for return <i>1/1/54</i>				
DATE OF REPORT <i>1/1/54</i> SIGNED <i>W. J. Clark</i> REG. ENG. <i>W. J. Clark</i>				
GRANT/REFUSAL is recommended subject to the following conditions for the reasons stated:				
DATE <i>1/1/54</i> SIGNED <i>W. J. Clark</i> C.M.O. <i>W. J. Clark</i>				
GRANT/REFUSAL is recommended subject to the following conditions for the reasons stated:				
DATE <i>1/1/54</i> SIGNED <i>W. J. Clark</i> C.M.O. <i>W. J. Clark</i>				
GRANT/REFUSAL is recommended subject to the following conditions for the reasons stated:				

*Because of nature of grant structure this proposal will not adversely affect overall development.*

*Decision 1/1/54*



APPLICANT'S NAME AND ADDRESS <div style="text-align: center;">Christopher Dodd c/o Kim Clarke Sky Road Cluden</div>		NOTIFICATION TO REAL ESTATE BRO. <div style="text-align: center;">f</div>	
DECISION DATE 3. 6. 84		TOWNLAND TO ROAD	
APPLICATION FOR Particular for extension to house		RECEIVED ON 14. 4. 84	
WILLING AT Information supplied by Applicant	Replacement of sub-standard house. NO	Standard Septic Tank Plans and conditions. YES	NOTICE BY/OF AND Owner of site PPPP/PP/PP/PP
Now Farm House? NO	Second Family House? NO	Public Sewer Supply Tank NOT	Public Sewer YES/NO ST
GRANTOR'S, SINGER H/O NO	Class No	PREVIOUS APPLICATIONS Reg. No and Decision	REFER TO Dss. Eng.
DATER HAPPTD GR. PLOON SINGER SING. PLOON SINGER	Ant. of fee Df. E	2-2-84 C.P.P.	C.A.S. C.P.G.
TO REG. ENG. 1		SPECIFIC CLAUSE:- Is demolition Or of use	of existing house involved
REMARKS IS recommended subject to the following conditions for the reasons stated:-			
<p>GENERAL COMMENTS:</p> <p>Is notice O.K.?</p> <p>Recommended Building Line .....</p> <p>Recommended Road Improvement Line .....</p> <p>Recommended Placement of Front Boundary .....</p> <p>Ref. No. of any adjacent Site Plans .....</p> <p>Ref. No. of any adjacent Scientific Site .....</p> <p>Adjacent to Road No. ....</p> <p>Adjacent to Public Water Supply .....</p> <p>Adjacent to Public Sewer .....</p> <p>Orality Requirement .....</p>			
TIME OF HEARING		SIGNED..... ENG. ENG. (1/1/84)	
GRANT/REFUSAL IS recommended subject to the following conditions for the reasons stated			
DIVER		SIGNED..... C.M.O.	
GRANT/REFUSAL IS recommended subject to the following conditions for the reasons stated			
DIVER		SIGNED.....	
GRANT/REFUSAL IS recommended subject to the following conditions for the reasons stated			

LIAM CLARKE

Architect B.Arch. MRIAI



SKY ROAD  
CLIFDEN  
Co. GALWAY  
Tel: (095) 21433  
Fax: (095) 21433

PLANNING DEPT

Your ref:

Our ref:

Date: 14/4/94

Re: EXTENSION TO HOUSE AT WISHNEE FOR CHRISTOPHER DODD

Dear Sir

I submitted an application for Planning Permission for the above on 12/4/94. I may have omitted one of the drawings of the proposed extension. I now enclose 3 sets of the proposed drawings - could you please add these to the application?

Yours faithfully

Liam Clarke

70793

15 APR 1994

Planning & Development Section  
GALWAY COUNTY COUNCIL

Ref: No. 15 0493764

GALWAY COUNTY COUNCIL  
COMHAIRLE CHONTAE NA GAILLIMHE  
PLANNING APPLICATION FORM  
FOIRM IARRATAIS PLEANALA

All Questions Must Be Answered  
Ní Mór Gach Ceist A Fhreagairt



Planning & Development Section  
An Roinn Pleanála agus Forbairt  
County Buildings  
Araon Chontae  
Galway Phones: (091) 63151  
Gaillimh Fóna: (091) 63151  
Fax: (091) 65817  
Faics: (091) 65817

Local Government (Planning & Development) Acts, 1963 - 1992.  
Achtanna an Rialais Aitiúil (Pleanála agus Forbairt) 1963 go dtí 1992

APPLICATION FOR:

Iarratas do:

1. Permission ☒ Outline Permission ☐ Approval ☐ Retention ☐  
Ceist Ceist Imlíne Ceist Ulltas Ceist Choinneall

2. Applicant's Name (Mr, Mrs, Miss) - Christopher Dodd

3. Address - Kileurrun, Inishoes, Roundstone, Co. Galway.

4. Address to which correspondence and notices are to be sent: Phone No. 1  
Seoladh do chomhairleas: Uimhir Fóna:

5. Name and Address of Agent authorised to act on behalf of applicant: Linn Clarke, B'Archi, B'Archi, Sky Road, Clifden, Co. Galway

6. Name and Address of person responsible for preparation of plans: As above

7. Name and Address of person responsible for preparation of plans: As above

8. Applicant's interest in site - (i.e. owner, prospective buyer etc.): Owner

9. State the area of the site to which the application relates (in hectares): 1.16 Hectares

10. If applicant is not the owner, state the owner's name and address: As above

11. Description of proposed development: Extension to College

12. If application is for retention, please indicate: As above

(a) date commenced (b) date completed

11. Location of proposed development (i.e. street, town, townland, etc.):  
 Suburb as forberds as loamshio (i.e. wild, baile, baile feann)

Kilcurtron, Inishnee, Roundstone, Co. Galway.

12. State number of dwellings (if any) to be provided:

13. Previous permission no's. (if any): 53320 and 68821  
Ulmbrachs last collection

13. Previous permission no's. (if any): 53320 and 68821  
Ulmbrachs last collection

14. Floor area of proposed building: 24 sq. metres. Estimated cost of proposed building: £ 10,000.00

14. Floor area of proposed building: 24 sq. metres. Estimated cost of proposed building: £. 10,000.00  
 Achar wala an Holigumbh an beauratke: Tushin ar coust ar ferbarish an beauratke.

15. Existing use of land or structure: House and Studio  
 Used as a house and an independent footpath:

16. Will proposed application be accompanied by an Environmental Impact Statement?  
An miloed issest loon alleestert ar en diimpactstet groudseche an lareest an beartidde? ☐ YES ☒ NO  
S'et NO

17. Have you consulted the E.S.D. in relation to the proposal? **Exlating Supply**  
 An chuir an t-ádh eile an B.S.L. mar chiall arís a bhaint de na tair?  
 (English translation: Have you consulted the E.S.D. in relation to the proposal?)

18. State source of water supply for proposed development: Existing Supply  
 Water taken in holes or from the nearest available source:

19. Will proposed development be connected to: (a) public sewer ☐ or (b) septic tank ☒  
 An mchdy an tharbyr aia bearnltho ceangltho le crrss searh thas pholthl rtho dabhth searhthla

20. Will septic tank be constructed in accordance with Eolus Publication S.R. 6 1981?  
An mbech na gathach seachtshé leighid de níl foilseachan eolus S.R. 6 1981?

Existing Septic Tank

If yes, submit trial hole and percolation test results on Form A.

21. (a) Is proposed development a replacement of substandard dwelling? YES ☒ NO ☐  
An in-law unit in an in-law unit? YES ☐ NO ☒

(b) Is proposed development a new farm house on your farm? YES ☐ NO ☐

(c) Is proposed development an additional family dwelling on the family farm? YES ☐ NO ☐

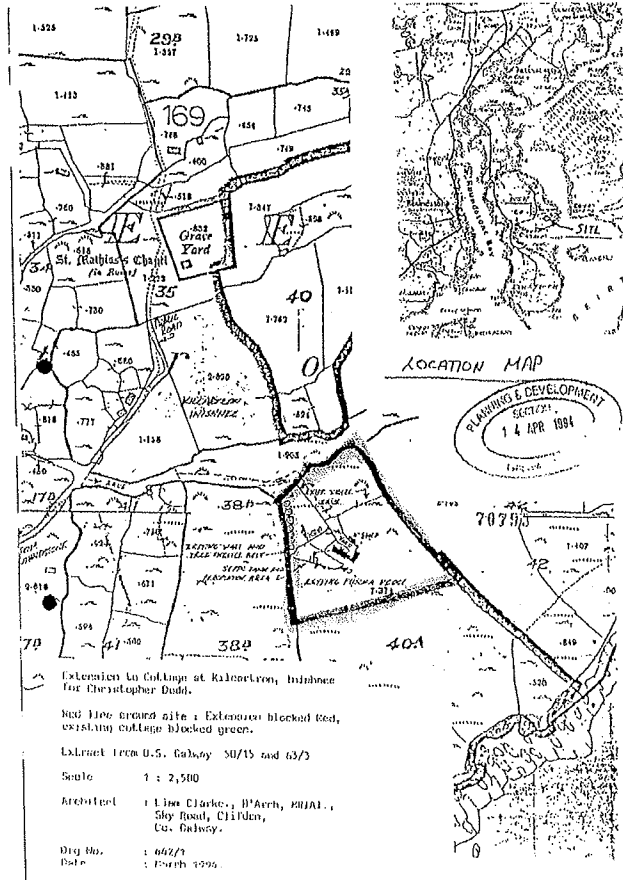
If the answer to any of the above questions is 'Yes' then complete relevant Forms available from Planning Office and indicate on the maps the location of your present dwelling and the boundaries of all land held by you or your family. Make a list in French or in Chinese of all categories of buildings, both on the premises and on the land to which the Office has access and give the number of persons who live on the premises. Give the number of persons who live on the premises and the number of persons who live on the land to which the Office has access.

I certify that the information given above is correct and I enclose herewith fee £ 21.00  
 Derbeim to EN(4) an i-ecol an techi Quot oem crula scit culim churic le sio illle.

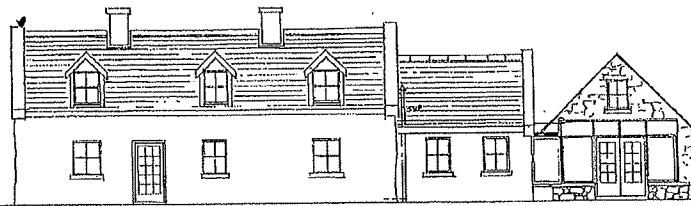
SIGNATURE OF APPLICANT (OR AUTHORISED AGENT)  
SINGH ANJARATHOIR (HIGHIOMBAIRE UPRATIE)

\_\_\_\_\_ Date: 30/3/2024

IMPORTANT: Please notify this office if you do not receive an acknowledgement of this application within 7 days.  
TABHACHTACH: Munn thischeann an adhbhar ar an t-urra seo laistigh de 7 la, cuir e sin in iúl don oifis seo, le do thoil.



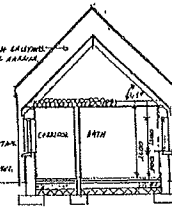
Copyright reserved to Architect. © All dimensions to be checked on site. Do not scale this drawing.



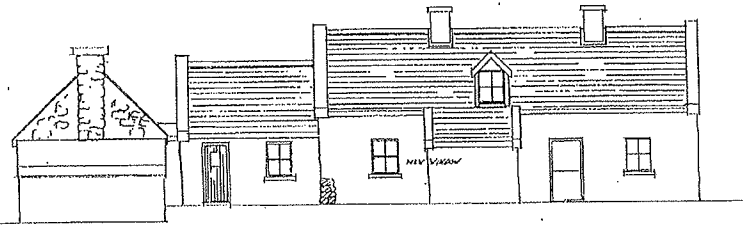
SOUTH-WEST

APPROX. SLATE EAVE TO PORCH EAVES 150 1/2" (3.91m) - 10" (254mm) PARAPET

CHIMNEY CLASPED NEW WINDOWS, LUTHERAL PLASTER TO PORCH EAVES. 2 IN 100 CHIM - BRICK BLANKS, FASCEATED WITH SLATE OR SLATE

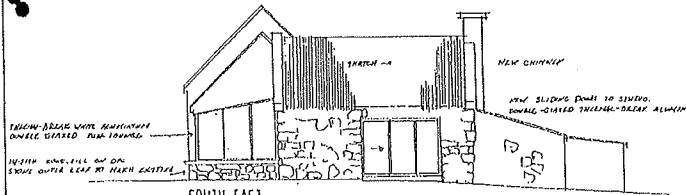


SECTION AA



NORTH-EAST

PARKED EXTENSION



SOUTH EAST

TRIMMING BRASS WORK REFINISHED, DOUBLE GLAZED PULL-TREATED

14" (355mm) BRICK, FILL OUT ON SOUTH OUTER LEAF TO MATCH EXISTING

SPATULA - A

NEW CHIMNEY

NEW SLIDING DOOR TO GARDEN, DOUBLE GLAZED THERMAL-BREAK ALUMINUM

7.07.93

Architect : LIAM CLARKE B.Arch, MR.IAI  
Sky Road Cliden Co. Galway 095 21433

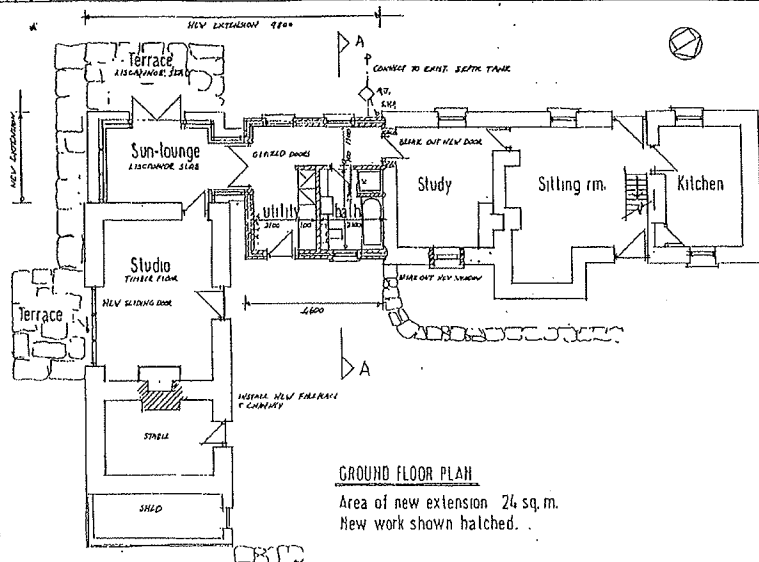
Revisions

EXTENSION TO COTTAGE ON INHILL  
FOR CHRISTOPHER DODD

Scale : 1:100  
Date : JULY 1994

Org. no.  
442/3

Copyright reserved to Architect. © All dimensions to be checked on site. Do not scale this drawing.



15 APR 1984

Planning & Development Section  
GALWAY COUNTY COUNCIL

70797

Architect : LIAM CLARKE B.Arch, MRIBA  
Sky Road Clifden Co. Galway 095 21433

## Revisions

EXTENSION TO COTTAGE ON INISHMALL  
FOR CHRISTOPHER DODD.

Scale : 1:100  
Date : APRIL 1994

Org. no. 442/2





## **EXHIBIT 5**

(b) date completed  
data criochnaithe

**11. Location of proposed development (i.e. street, town, townland, etc.):**

Suíomh na forbartha ata beartaithe (i.e. sraid, baile, baile fearainn)

Keartron. Inishnee, Co Galway.

**12. State number of dwellings (if any) to be provided:**

Luaigh líon na dteach conaithe ata le cur ar fáil:

4

**13. Previous permission no's. (if any):**

Uimhreacha iar cheadaithe:

None

**14. Floor area of proposed building:**

Achar urlair an fhoirgnimh ata beartaithe:

127

sq. metres.

**Estimated cost of proposed building: £ 100,000**

Tuairim ar costas na forbartha ata beartaithe.

**15. Existing use of land or structure:**

Usaid na talun nó an fhoirgnimh faoi lathair:

Agriculture

YES

NO

S'ea

Ni'hea

**16. Will proposed application be accompanied by an Environmental Impact Statement?**

An mbeidh raiteas faoin eifeacht ar an dtimpeallacht i gcuideachta an iarratas ata beartaithe?

☐☒

**17. Have you consulted the E.S.B. in relation to the proposal?**

An chuir tu sceal chuig an B.S.L. mar cheall ar coras leictreachais den forbairt?

YES

**18. State source of water supply for proposed development:**

Luaigh foinse an tsolathar uisce don bhforbairt ata beartaithe:

Public Mains

**19. Will proposed development be connected to: (a) public sewer**

An mbeidh an fhorbairt ata beartaithe ceangailte le

☐

coras searachais phoiblí

or  
no

**(b) septic tank**

dabhach searachais

☒

YES

NO

S'ea

Ni'hea

**20. Will septic tank be constructed in accordance with Eolas Publication S.R. 6 1991?**

An mbeidh an dabhach searachais togha de reir foilseachan eolas S.R. 6 1991?

☒☐

**\* If yes, submit trial hole and percolation test results on Form A.**

Ma ta, cuir ar aghaidh torthaí an phoill teastala agus na triallacha sióthlathaithe ar Fhoirm A.

Planning and Development Section

**21. (a) Is proposed development a replacement of substandard dwelling?**

An teach nua é in ionad sean teach?

☐☒

S'ea

Ni'hea

**(b) Is proposed development a new farm house on your farm?**

An teach feirme nua é?

☐☒

S'ea

Ni'hea

**(c) Is proposed development an additional family dwelling on the family farm?**

An teach conaithe sa bhreis ar fheirm an teaghlaigh an fhorbairt nua?

☐☒

S'ea

Ni'hea

If the answer to any of the above questions is 'Yes' then complete relevant Forms available from Planning Office

and indicate on site maps the location of your present dwelling and the boundaries of all land held by you or your family.

Mas é "ta" an freagra ar aon cheann de na ceistanna thuasluaite, líon na foirmeacha ata le fáil an Oifig Pleanála agus taispeáin ar léarscáil ionaid, do theach conaithe faoi lathair agus teorainn na talún ar fad ata agat féin nó ag do chlann.

I certify that the information given above is correct and I enclose herewith fee £ 42.00

Dearbhaim go bhfuil an t-eolas ata tugtha thuas agam cruinn agus cuirim chugat le seo taille.

**SIGNATURE OF APPLICANT (OR AUTHORISED AGENT)**

SINIÚ AN IARRATHOIR (NÓ GNÍOMHAIRE UDRAITHE)

*John Burke*

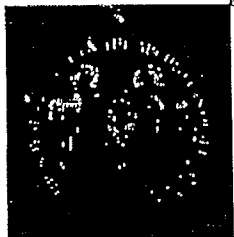
Date:

14/4/98

Date:

**IMPORTANT: Please notify this office if you do not receive an acknowledgement of this application within 7 days.**

**TABHACHTACH: Muna bhfaigheann tu adhmhail ar an iarratas seo laistigh de 7 lá, cuir é sin in iúl don oifig seo, le do thoil.**



# Niall J. Kearns & Co.

## ARCHITECTS

Galway County Council,  
Planning & Development Section,  
Liosbaun Ind. Estate,  
Tuam Road,  
Galway.

RECEIVED

Planning & Development Section  
GALWAY COUNTY COUNCIL

27 WILLIAM STREET WEST, GALWAY.  
Tel (091) 586176 Fax (091) 589445

Ref.

877.

20/05/98.

Pl. Ref. No. 98/1287 - Galway County Council.

Re: Application to construct dwelling house with proprietary  
effluent Treatment System in Inishnee, Roundstone, Co. Galway.  
=====

Dear Sirs,

On behalf of our client Paul & Joyce Kelly, Inishnee, we wish  
to lodge an objection to any decision to grant permission to the  
above application. The reasons for our objection are as follows.

1. The proposed development is located in an exposed section of landscape designated as an area of High Senic Amenity (HSAA) in the County Development Plan, which could result in serious injury to the visual amenity both from land and sea, and it would alter the character of the area and detract from it.
2. Houses permitted in areas zoned High Scenic Amenity are restricted to those under family need. This is obviously not the case in this application as Chris Dodd already owns a (holiday) house on adjoining lands and his domicile is in the U.S.A. (Development Control Policy).
3. The proposed development cannot comply with the requirement of the County Development Plan with regard to Public Road Frontage as defined in Table 7A (1) of the County Development Plan.
4. Section 7.2.2 of the Development Plan excludes "Piecemeal and disorderly development of backlands". This site matches the definition of "Backlands" in the Plan.
5. To permit this house would create a precedent for indiscriminate development of holiday houses, on Inishnee, with disastrous effects on a relatively unspoilt environment.

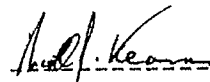
Continued over...

Continuation Sheet/...

6. We note that the applicant proposes to obtain his water supply across my clients land. While this is not strictly a matter for the Planning Authority to consider, my clients have not given consent for this encroachment or easement.
7. On matters of procedure, the required tests for soil suitability (S.R.6: 1991) septic tanks have not been submitted. Neither have any details of the "Proprietary Effluent Treatment System been submitted. As a result, we cannot examine the application in respect of this aspect.

Please inform us of any submission of further information or a decision by the Planning Authority.

Yours sincerely,

  
-----  
Niall J. Kearns.

## **EXHIBIT 6**

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## How politics works: Senator Christopher Dodd and his cosy Irish cottage

Posted By: [Toby Harnden](#) at Feb 24, 2009 at 05:44:00 [General]  
Posted In: [Foreign Correspondents](#)

Tags: [Barack Obama](#), [Bill Clinton](#), [Christopher Dodd](#), [COTTAGE](#), [Edward R. Downe Jr](#), [Galway](#) [View More](#)

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## How politics works: Senator Christopher Dodd and his cosy Irish cottage

Posted By: [Toby Harnden](#) at Feb 24, 2009 at 05:44:00 [[General](#)]

Posted in: [Foreign Correspondents](#)

An intriguing item [here](#) from the dogged Kevin Rennie of the Hartford Courant that highlights a classic example of why ordinary citizens become cynical about politicians and the way business in Washington is conducted.

Silver-haired [Senator Christopher Dodd](#), chairman of the Senate Banking Committee, has already been getting a lot of heat for his two 2003 [VIP mortgage loans from Countrywide](#), one of the major actors in triggering the current financial crisis.

Seeking Senate re-election in 2010, the 2008 presidential candidate (he dropped out on the first day of voting after finishing seventh in Iowa, where he had moved with his family as a way of courting voters) is now in a bit of a sticky spot with another accommodation- his "cottage" on the lovely Irish island of Inishnee.



Some digging from Rennie (a lawyer and former Connecticut state legislator) reveals that as well as there being a cloud over Dodd's properties in Connecticut and Washington DC, considerable murkiness surrounds the financial arrangements for the purchase of his "cottage".

As Rennie outlines, Dodd became part owner of the 10-acre Galway property in 1994 along with Missouri businessman William Kessinger, whom Dodd knew through investor Edward R. Downe Jnr, who had pleaded guilty the previous year to insider trading charges. The mortgage was listed as "between \$100,001 and \$250,000". Downe was a witness to Kessinger's purchase.

In 2001, Dodd circumvented the US Justice Department to help get his pal Downe a full pardon on President Bill Clinton's last day in office. The following year, Dodd bought off Kessinger's two-thirds share of the "cottage" for, Dodd said, \$127,000.



Ever since then, Dodd has continued to list the value of the property as "between \$100,001 and \$250,000".

Check out the picture of Dodd's "cottage" (provided to me by Rennie), where he spends summers and which is looked after during the rest of the year by a caretaker. It's not exactly the humble tumbledown abode with a leaky thatched roof, a fireplace with peat thrown on it and donkey tethered outside that the Senator might like you to envisage.

The nearby village of Roundstone is a celebrity hangout. When he's there, the Sunday Times reported in 2007, he's likely to "rub shoulders with [RTE's] Pat Kenny, Bill Whelan of Riverdance, Lochlann Quinn, the former AIB chairman, and the singer Brian Kennedy".

Given the Irish property boom, a conservative estimate would be that the house would be worth approaching \$1 million, and very possibly much more than that.

So why hasn't Dodd declared a more realistic true value of the property? No doubt he didn't want to highlight the fact that he had a third splendid pile, to go along with his residences in DC and Connecticut, as he sought the presidency (remember how all those homes harmed John McCain?). Maybe he knew it would mean further scrutiny of his connection with the pardoned crook Downe.

Now that President Barack Obama - whom Dodd enthusiastically endorsed for president over Hillary Clinton - has declared a new era of ethical government in Washington, his former Senate colleague will order a fresh, long overdue reappraisal of its value. Or perhaps the Senate Ethics Committee will look into the matter.

Call me cynical, but I wouldn't advise you to hold your breath.

## **EXHIBIT 7**

courant.com/news/politics/hc-dodd0310.artmar10,0,4641659.story

# Courant.com

**GOP assails dodd**

## GOP Chairman Criticizes Dodd Real Estate Deal

By DAVE ALTIMARI and MATTHEW KAUFFMAN

The Hartford Courant

March 10, 2009

A Washington, D.C., condominium deal between Sen. Christopher J. Dodd and a Wall Street executive whom Dodd later recommended for a presidential pardon has the state Republican Party chairman comparing the embattled senator to former Gov. John G. Rowland.

"The parallels are frighteningly similar to Rowland — the cheap rental condo in Washington, D.C., the lakeside cottage with the sweetheart mortgage deal," state GOP Chairman Christopher Healy said Monday.

But an aide to Dodd says it's a cheap shot by Republicans looking to divert attention from the party's failings.

"It seems that launching these petty attacks is a lot easier for the Republicans than explaining their support for George Bush's failed policies or offering any real solutions to the serious problems facing the people of this state," said spokesman Bryan DeAngelis.

The latest questions about Dodd, first raised in Sunday's Courant by columnist Kevin Rennie, concern his relationship with Edward R. Downe Jr., a man convicted of tax and security fraud in the 1990s, only to get a pardon from President Bill Clinton in Jan. 2001. That pardon was boosted by a letter from Dodd, who wrote: "Over the years, Ed has expressed to me, his family and his friends his deep remorse for his actions."

In 1986, Dodd and Downe purchased a condominium together in Washington's affluent Sheridan-Kalorama neighborhood. Land records show that the purchase price was \$159,800, but do not indicate what portion Dodd paid.

More than three years later, Downe and his then-wife, Charlotte, transferred the condominium to Dodd alone, records show. Conveyance tax records indicate that the cost to Dodd to buy out Downe's share was about \$98,000, although it is unclear from the land records exactly what the senator paid.



In 1992, Downe was arrested and pleaded guilty to insider-trading allegations and agreed to pay the government \$11 million. He was pardoned in 2001 in the final hours of Clinton's presidency after Dodd wrote the letter in support of his friend. The pardon application did not go through the normal vetting process by the Department of Justice.

"It is obvious that the Connecticut Republican Party — or at least what's left of it — has been successful in inciting a lot of press coverage about a handful of real estate transactions that have been reported on by the press for decades," DeAngelis said. "These transactions are completely transparent, routine, and noncontroversial. In fact, the Senate Ethics Committee explicitly approved the Washington purchase nearly a quarter century ago."

Kessinger provided two-thirds of the money for the purchase. Eight years later, when Dodd bought him out for \$122,000, Kessinger made a profit of only \$15,000, despite the fact that real estate prices in Ireland had exploded in that time, Rennie reported.

"There's a body of activity here that raises questions about Dodd that so far he hasn't really given reasonable answers to," Healy said.