

**UNITED STATES OF AMERICA
MERIT SYSTEMS PROTECTION BOARD**

SPECIAL COUNSEL,)	
)	
Petitioner,)	DOCKET NUMBER:
)	
v.)	
)	DATE: December 18, 2025
CHRISTOPHER PASCAL)	
and)	
CHESAPEAKE SHERIFF'S OFFICE,)	
Chesapeake, Virginia,)	
)	
Respondents.)	

COMPLAINT FOR DISCIPLINARY ACTION

Petitioner U.S. Office of Special Counsel (OSC) brings this Complaint for Disciplinary Action (Complaint) for violating the Hatch Act, 5 U.S.C. §§ 1501-1508, against Respondent Undersheriff Christopher Pascal (Pascal) pursuant to 5 U.S.C. §§ 1212(a)(5), 1216(a)(2), 1216(c), 1502(a)(1), 1502(a)(2), 1504, and 5 C.F.R. § 151.121. The U.S. Merit Systems Protection Board (Board) has authority to adjudicate this action pursuant to 5 U.S.C. §§ 1204(a)(1), 1504, 1505, and 1506.

The Hatch Act restricts the political activity of state and local officers or employees “whose principal employment is in connection with an activity which is financed in whole or in part by loans or grants made by the United States or a Federal agency.” 5 U.S.C. § 1501(4). Section 1502(a)(1) of Title 5 of the *United States Code* prohibits a state or local officer or

employee from “us[ing] his official authority or influence for the purpose of interfering with or affecting the result of an election or a nomination for office.” Pursuant to 5 C.F.R. § 151.101(f), “election” includes a primary, special, and general election. Section 1502(a)(2) of Title 5 of the *United States Code* prohibits a state or local officer or employee from “directly or indirectly coerc[ing], attempt[ing] to coerce, command[ing], or advis[ing] a State or local officer or employee to pay, lend, or contribute anything of value to a party, committee, organization, agency, or person for political purposes,” including contributions of “time and effort.” *Special Counsel v. Gallagher*, 44 M.S.P.R. 57, 85 (1989). “[I]t is inherently coercive for a supervisor to ask an employee to contribute to a political cause, absent exculpatory circumstances.” *Special Counsel v. Purnell*, 37 M.S.P.R. 184, 195 (1988), *aff’d sub nom., Fela v. Merit Sys. Prot. Bd.*, 730 F. Supp. 779 (N.D. Ohio 1989).

The Hatch Act prohibits covered supervisory state and local government employees from creating in their workplaces a culture of fear and intimidation regarding political contributions. In *Special Counsel v. Gallagher*, the Board found multiple Hatch Act violations where senior agency officials engaged in “rampant” solicitation “of funds or time and effort” from subordinate employees. 44 M.S.P.R. at 82. These included a supervisor “dropp[ing] on [a subordinate’s] desk a series of 10 tickets” to a political fundraiser and asking the subordinate to sell the tickets, which the subordinate did only because she “was afraid not to,” *id.* at 87, and another supervisor asking a subordinate to volunteer for a political campaign, which the subordinate felt she could not decline, *id.* at 85.

As alleged herein, while serving as Chief Deputy and Undersheriff of the City of Chesapeake, Virginia, Pascal oversaw a coercive workplace environment similar to that in

Gallagher. The singular aim of the coercion was to ensure that incumbent Sheriff David Rosado (Rosado) was elected sheriff in 2025. For over a year, Pascal pressured subordinate Chesapeake Sheriff's Office (CSO) employees to support Rosado's campaign through contributions of time, money, and effort. Among other things, Pascal: confronted subordinate employees in the workplace about whether they intended to contribute to Rosado's campaign; questioned subordinate employees about why they were not posting more frequently on their personal social media accounts about Rosado's campaign; requested that subordinate employees volunteer for Rosado's campaign on weekends, weekdays, and evenings, even if it meant the employees would need to use personal leave; organized subordinate employees to staff Rosado campaign events; and expected subordinate employees to sell or personally pay for fundraising tickets. In so doing, Pascal violated the Hatch Act by abusing his power as the second in command of CSO to coerce many CSO employees into engaging in political activity in support of Rosado's campaign.

I. STATEMENT OF SUPPORTING FACTS

1. At all times relevant to this Complaint, the City of Chesapeake Sheriff's Office (CSO) employed Pascal.

2. The CSO is a law enforcement agency whose functions include operating the Chesapeake Correctional Center, investigating illegal activity by inmates, transporting inmates, providing city court security, serving warrants and protective orders, and apprehending fugitives.

3. Since November 1, 2024, and continuing through the date of this Complaint, Pascal has held the position of Undersheriff of the City of Chesapeake, Virginia.

4. Since November 1, 2024, and continuing through the date of this Complaint, Rosado has held the position of Sheriff of the City of Chesapeake, Virginia.

5. The position of undersheriff is the second-highest ranking position in the CSO and reports to the sheriff.

6. As undersheriff, Pascal is responsible for all CSO operations.

7. Pascal held the position of chief deputy in 2023 until November 1, 2024.

8. Rosado held the position of undersheriff in 2023 until November 1, 2024.

9. CSO is organized and operated in a hierarchical, semi-military manner with all CSO employees subordinate to the sheriff.

10. The undersheriff is subordinate only to the sheriff with all other CSO employees subordinate to the undersheriff.

11. The CSO Command Staff is comprised of the sheriff, the undersheriff, the chief deputy sheriff, majors, and captains.

12. The Command Staff oversees various lower ranking CSO employees, including deputies, senior deputies, master deputies, sergeants, lieutenants, and civilian staff.

13. At all times relevant to this Complaint, Pascal assisted Rosado with his duties.

14. When Rosado was undersheriff, Pascal was the chief deputy, and when Rosado became sheriff, Pascal became undersheriff.

15. In 2024 and 2025, the CSO engaged in activities financed in whole or in part by federal funds. The federal funding mechanisms include, but are not limited to, the following:

- a. Grants from the U.S. Department of Justice for Victim Witness Programs;
- b. Funding for joint law enforcement operations with U.S. Immigration and Customs Enforcement, Homeland Security Investigations;
- c. Funding for joint law enforcement operations with the U.S. Marshals Service;
- d. Funding for joint law enforcement operations with the U.S. Drug Enforcement Administration; and
- e. Funding from the U.S. Departments of Justice and of the Treasury for equitable sharing payments resulting from the CSO's assistance with federal law enforcement operations.

16. At all times relevant to this Complaint, Pascal, as undersheriff and chief deputy, exercised oversight of these federally financed activities.

A. Rosado was a candidate in the 2025 election for Chesapeake Sheriff.

17. Beginning at least as early as June 23, 2023, and continuing through November 4, 2025, Rosado was a candidate for the office of Chesapeake Sheriff.

18. Rosado first ran in the Republican primary election for Chesapeake Sheriff.

19. Rosado's opponent, Wallace Chadwick III, won the Republican primary election, held on June 17, 2025.

20. After losing the Republican primary election, Rosado began a write-in campaign for Chesapeake Sheriff in the general election, held November 4, 2025.

21. After the primary election, the Chesapeake Democratic Committee endorsed Rosado for sheriff.

22. On or before June 23, 2023, Rosado registered a candidate campaign committee, “Friends of Dave Rosado,” with the Virginia State Board of Elections.

23. Rosado used “Friends of Dave Rosado” to support his candidacy in both the Republican primary election and the general election.

B. Pascal used two events marketed as staff appreciation events to promote Rosado’s campaign to CSO staff.

24. During January and February of 2025, CSO staff in the Public Information Office (PIO) sent multiple emails from their official CSO email accounts to all CSO employees’ official CSO email accounts notifying them about two staff appreciation events, some of which stated, in part, “Sheriff Rosado and his Command Staff appreciate your hard work and want to celebrate each of you for your continued dedication to the Chesapeake Sheriff’s Office” and other words to that effect.

25. Sometime prior to the staff appreciation events, Rosado and Pascal were advised that they could not use CSO funds to pay for the events because there would be campaign signs at the events.

26. On or about February 26, 2025, Rosado, Pascal, and the CSO Command Staff hosted the first of two “Sheriff Rosado’s Employee Appreciation Night” events (also referred to as “Chesapeake Sheriff’s Office Staff Appreciation Night”) (hereinafter “Staff Appreciation Part One”) at Greenbrier Farms in Chesapeake, Virginia.

27. CSO employees attended Staff Appreciation Part One, and despite the event not being advertised as a Rosado campaign event, multiple CSO Command Staff, including Rosado and Pascal, wore Rosado campaign hats at the event.

28. At Pascal's direction, CSO employees organized, set up, and operated the event, and brought and displayed Rosado campaign signs.

29. CSO Command Staff also served food to CSO staff at Staff Appreciation Part One.

30. Rosado gave verbal remarks at Staff Appreciation Part One, in which he encouraged CSO employees to support his candidacy, or words to that effect.

31. Rosado made campaign signs available for CSO employees to take home from Staff Appreciation Part One.

32. A February 27, 2025 post to the CSO's official Facebook account stated about the event, "What a great time! Sheriff Dave Rosado and our Command Staff put together the Chesapeake Sheriff's Office Staff Appreciation Night. Employees from various sections enjoyed music, good food, and good fellowship. Sheriff Rosado and the Command Staff appreciate the hard work and wanted to celebrate each employee for their continued dedication to the Chesapeake Sheriff's Office."

33. Rosado's "Friends of Dave Rosado" candidate committee reported cash expenditures on February 24 and February 26, 2025, for items or services related to what were described in the disclosure forms as a campaign volunteers appreciation dinner and a campaign volunteers appreciation event.

34. However, the campaign volunteers appreciation event described in the preceding paragraph was in fact Staff Appreciation Part One.

35. On or about March 19, 2025, Rosado, Pascal, and the CSO Command Staff hosted the second of two "Sheriff Rosado's Employee Appreciation Night" events (hereinafter "Staff Appreciation Part Two") at Greenbrier Farms in Chesapeake, Virginia.

36. Similarly, CSO employees attended Staff Appreciation Part Two, and despite the event not being advertised as a Rosado campaign event, multiple CSO Command Staff, including Rosado and Pascal, wore Rosado campaign hats at the event.

37. At Pascal's direction, CSO employees organized, set up, and operated the event, and brought and displayed Rosado campaign signs.

38. CSO Command Staff also served food to CSO staff at Staff Appreciation Part Two.

39. Rosado gave verbal remarks at Staff Appreciation Part Two, in which he encouraged CSO employees to support his candidacy, or words to that effect.

40. Rosado made campaign signs available for CSO employees to take home from Staff Appreciation Part Two.

41. A March 20, 2025 post to the CSO's official Facebook account stated about the event, "Another fantastic time was had at the Chesapeake Sheriff's Office Staff Appreciation Night Part II. Employees from various sections came together to enjoy music, delicious food, and great camaraderie. Sheriff Rosado and the Command Staff wanted to celebrate each employee for their work ethic, dedication, and unwavering commitment to the Chesapeake Sheriff's Office."

42. Again, Rosado's "Friends of Dave Rosado" candidate committee reported cash expenditures on March 4, March 18, and March 19, 2025, for items or services related to what was described in the disclosure forms as a campaign volunteers appreciation event.

43. However, the campaign volunteers appreciation event described in the preceding paragraph was in fact Staff Appreciation Part Two.

44. The CSO Newsletter for the first quarter of 2025 – covering January through March – included the “Sheriff’s Message” from Rosado in which he wrote, “our Employee Appreciation events gave us the opportunity to recognize the outstanding dedication and hard work you bring to this department. Each of you plays a crucial role in our success, and it’s important to take the time to celebrate that.”

C. Pascal was involved in using CSO employees to assist with and/or sell tickets to Rosado’s numerous campaign fundraisers and kickoff events.

45. On March 16, 2024, Rosado held a campaign fundraiser called “Dave Rosado for Sheriff Presents: St. Paddy’s Day Hops Festival” (hereinafter “2024 Hops Festival”) at the Khedive Temple in Chesapeake, Virginia.

46. Pascal used CSO employees to organize, set up, and operate the 2024 Hops Festival, including selling tickets, displaying campaign signs, checking identification, picking up trash, operating the food station and drink stations, and cleaning up.

47. Between approximately mid-February and March 16, 2024, Pascal expected CSO supervisors to sell an allocated number of tickets for the 2024 Hops Festival fundraiser.

48. Pascal was involved in a tiered scheme wherein the number of 2024 Hops Festival fundraiser tickets that each CSO supervisor was allocated to sell was based upon each supervisor’s rank.

49. Lieutenants, captains, majors, the chief deputy, and the undersheriff were each asked or expected to sell ten (10) 2024 Hops Festival fundraiser tickets, and sergeants were each asked or expected to sell five (5) tickets.

50. Each 2024 Hops Festival fundraiser ticket cost \$35.00.

51. Supervisors were expected to contribute the total amount of the face value of each of their respective allotment of tickets for the 2024 Hops Festival fundraiser with proceeds going to Rosado's campaign.

52. The majority of CSO supervisors who were asked or expected to sell tickets for the 2024 Hops Festival fundraiser contributed to Rosado's campaign the total amount of the face value of each supervisor's respective allotment of tickets.

53. Some CSO supervisors were unable to sell their respective allotment of 2024 Hops Festival fundraiser tickets and therefore personally contributed to Rosado's campaign an amount equivalent to the face value of their unsold tickets.

54. To assist Rosado's campaign with tracking the sale of fundraising tickets, a CSO employee tracked on a spreadsheet the amount of money contributed by each CSO supervisor who was allocated 2024 Hops Festival fundraiser tickets to sell.

55. The CSO employee also tracked the number of unsold tickets returned by each CSO supervisor.

56. On June 3, 2024, Rosado held another campaign fundraiser called the "Sheriff's Shootout Golf Tournament" at the Greenbrier Country Club in Chesapeake, Virginia (hereinafter "2024 Golf Tournament").

57. One month prior, on May 1, 2024, a CSO PIO employee emailed from their official CSO email account to all CSO employees' official email accounts a newsletter which advertised the 2024 Golf Tournament as "Undersheriff Rosado's Golf Tournament" and indicated that this event was "a CSO event."

58. Pascal was involved in using CSO employees to organize, set up, and operate the 2024 Golf Tournament, including displaying campaign signs, distributing ice, and collecting trash.

59. CSO employees contributed money to Rosado's campaign by paying to play in the 2024 Golf Tournament, which cost \$800 per foursome.

60. CSO employees also contributed money to Rosado's campaign by purchasing sponsorships to the 2024 Golf Tournament; it cost \$200 to sponsor a golf green, which included a sign with the sponsor's name displayed next to the relevant green, or \$100 to sponsor a tee box, which included a sign with the sponsor's name displayed next to the relevant tee box.

61. On January 2, 2025, Rosado held his first campaign event of 2025, which was titled "Campaign Kickoff and Fundraiser" (hereinafter "January 2025 Campaign Kickoff and Fundraiser").

62. Pascal was involved in using CSO employees to organize, set up, and operate the January 2025 Campaign Kickoff and Fundraiser, including displaying campaign signs at the event, and setting up food and drinks.

63. Pascal also asked CSO employees to bring him monetary contributions for the January 2025 Campaign Kickoff and Fundraiser.

64. On March 15, 2025, Rosado held another campaign fundraiser called "Sheriff Dave Rosado Presents: St. Paddy's Day Hops Festival" (hereinafter "2025 Hops Festival") at the Khedive Temple in Chesapeake, Virginia.

65. Pascal was involved in using CSO employees to organize, set up, and operate the 2025 Hops Festival, including selling tickets, displaying campaign signs, checking identification, picking up trash, operating the food station and drink stations, and cleaning up.

66. Between approximately mid-February and March 15, 2025, Pascal expected CSO supervisors to sell an allocated number of tickets for the 2025 Hops Festival fundraiser.

67. Here again, Pascal was involved in a tiered scheme wherein the number of 2025 Hops Festival fundraiser tickets that each CSO supervisor was allocated to sell was based upon each supervisor's rank.

68. Lieutenants, captains, majors, the chief deputy, and the undersheriff were each asked or expected to sell ten (10) 2025 Hops Festival fundraiser tickets, and sergeants were each asked or expected to sell five (5) tickets.

69. Each 2025 Hops Festival fundraiser ticket cost \$35.00.

70. Supervisors were expected to contribute the total amount of the face value of each of their respective allotment of tickets for the 2025 Hops Festival fundraiser with proceeds going to Rosado's campaign.

71. The majority of CSO supervisors who were asked or expected to sell tickets for the 2025 Hops Festival fundraiser contributed to Rosado's campaign the total amount of the face value of each supervisor's respective allotment of tickets.

72. Some CSO supervisors were unable to sell their respective allotment of 2025 Hops Festival fundraiser tickets and therefore personally contributed to Rosado's campaign an amount equivalent to the face value of their unsold tickets.

73. As with the 2024 Hops Festival described above, to assist Rosado's campaign with tracking the sale of fundraising tickets, a CSO employee tracked on a spreadsheet the amount of money contributed by each CSO supervisor who was allocated 2025 Hops Festival fundraiser tickets to sell.

74. The CSO employee also tracked the number of unsold tickets returned by each CSO supervisor.

75. On June 4, 2025, Rosado held another campaign fundraiser called the "Sheriff's Shootout Golf Tournament" at the Greenbrier Country Club in Chesapeake, Virginia (hereinafter "2025 Golf Tournament").

76. Pascal was involved in using CSO employees to organize, set up, and operate the 2025 Golf Tournament, including displaying campaign signs, distributing ice, and collecting trash.

77. CSO employees contributed money to Rosado's campaign by paying to play in the 2025 Golf Tournament, which cost \$800 per foursome.

78. CSO employees also contributed money to Rosado's campaign by purchasing sponsorships to the 2025 Golf Tournament; it cost \$250 to sponsor a golf green, which included a sign with the sponsor's name displayed next to the relevant green, or \$100 to sponsor a tee box, which included a sign with the sponsor's name displayed next to the relevant tee box.

79. Pascal asked CSO employees to seek sponsors for the 2025 Golf Tournament, such as providing door prizes, sponsoring golf holes, and sponsoring golf greens.

D. Pascal helped Rosado use at least one CSO event to campaign for sheriff.

80. On October 1, 2025, the CSO hosted “The Great American Food Fest” (hereinafter “2025 Food Fest”) for the stated charitable purpose of raising money to fund charity programs and senior groups.

81. Pascal assisted Rosado in using this charitable event to support his campaign for Chesapeake Sheriff where, for example, campaign signs were displayed.

82. Pascal was involved in using CSO employees to organize, set up, and operate the 2025 Food Fest, including by selling tickets, displaying campaign signs, cooking food, distributing ice, collecting trash, working at gate admissions, providing security, and cleaning up.

83. Pascal ensured that only CSO employees who supported Rosado’s campaign were able to volunteer at the event. For example, Pascal prevented a willing volunteer from participating because he did not support Rosado’s candidacy.

E. CSO employees served as Rosado’s campaign treasurer and Pascal solicited CSO employees for monetary contributions to Rosado’s campaign.

84. Then-CSO employee [REDACTED] was the Treasurer of Friends of Dave Rosado until approximately October 6, 2025.

85. Since approximately October 6, 2025, CSO employee [REDACTED] has been the Treasurer of Friends of Dave Rosado.

86. In late 2024 and early 2025, Pascal asked CSO employees to make monetary contributions to Rosado’s campaign.

87. For example, in or around December 2024, Pascal confronted a member of the CSO Command Staff about whether that individual would make a monetary contribution of at least \$500 to Rosado’s campaign.

F. Pascal used CSO employees to campaign for Rosado around Chesapeake and at the polls.

88. On numerous occasions between January 2, 2025 and June 17, 2025 (the date of the Republican primary election), Pascal organized CSO employees to place Rosado campaign signs at various homes and locations throughout Chesapeake.

89. Between April 2025 and June 17, 2025 (the date of the Republican primary election), Pascal organized CSO employees to participate in numerous door-to-door canvassing efforts to campaign for Rosado, which included providing campaign literature to Chesapeake residents and speaking with Chesapeake residents about Rosado.

90. Between May 2, 2025 and June 14, 2025 – the early voting period prior to the Republican primary election for Chesapeake Sheriff – Pascal organized CSO employees to engage in campaign activity at Chesapeake polling sites in support of Rosado’s candidacy for Chesapeake Sheriff, which included providing campaign literature to Chesapeake voters as they entered the polling site and speaking with Chesapeake voters about Rosado.

91. Pascal was involved in having CSO employees participate in a campaign activity called the “midnight run” in the early hours of June 17, 2025 (the day of the Republican primary election), during which they placed or displayed Rosado campaign signs at multiple polling locations throughout Chesapeake.

92. Pascal organized CSO employees to engage in campaign activity at Chesapeake polling sites on June 17, 2025 (the day of the Republican primary election), in support of Rosado’s candidacy for Chesapeake Sheriff, which included providing campaign literature to Chesapeake voters as they entered the polling site and speaking with Chesapeake voters about Rosado.

93. Between the June 17, 2025 Republican primary election for Chesapeake Sheriff and the November 4, 2025 general election for Chesapeake Sheriff, Pascal organized CSO employees to place Rosado write-in campaign signs at various homes and locations throughout Chesapeake.

94. Between the June 17, 2025 Republican primary election for Chesapeake Sheriff and the November 4, 2025 general election for Chesapeake Sheriff, Pascal organized CSO employees to participate in door-to-door canvassing efforts to campaign for Rosado as a write-in candidate for Chesapeake Sheriff, which included providing campaign literature to Chesapeake residents and speaking with Chesapeake residents about Rosado.

95. On numerous occasions between September 19, 2025, and November 1, 2025 – the early voting period prior to the general election for Chesapeake Sheriff – Pascal organized CSO employees to engage in campaign activity at Chesapeake polling sites in support of Rosado’s write-in candidacy for Chesapeake Sheriff, which included providing campaign literature to Chesapeake voters as they entered the polling site and speaking with Chesapeake voters about Rosado.

96. Pascal organized CSO employees to engage in campaign activity at Chesapeake polling sites on November 4, 2025 – the day of the general election – in support of Rosado’s write-in candidacy for Chesapeake Sheriff, which included providing campaign literature to Chesapeake voters as they entered the polling site and speaking with Chesapeake voters about Rosado.

97. CSO employees had to use their own CSO annual leave to account for their time spent participating in neighborhood walks throughout Chesapeake canvassing door-to-door to campaign for Rosado during workdays.

98. CSO employees had to use their own CSO annual leave to account for their time spent participating in campaign activity at Chesapeake polling sites in support of Rosado's candidacy for Chesapeake Sheriff during workdays.

G. Pascal recruited CSO employees to support Rosado at Republican Party meetings.

99. On numerous occasions during 2024 and 2025, Pascal encouraged CSO employees to attend meetings of the Republican Party of Chesapeake to support Rosado's candidacy for Chesapeake Sheriff and garner support from the Republican Party for Rosado's nomination.

100. On numerous occasions during 2024 and 2025, with Pascal's knowledge, a CSO captain encouraged CSO employees to attend meetings of the Republican Party of Chesapeake to support Rosado's candidacy for Chesapeake Sheriff and garner support from the Republican Party for Rosado's nomination.

H. CSO employees were pressured to support Rosado's campaigns.

101. During 2024, Pascal displayed Rosado campaign hats in his CSO office.

102. During 2024, Pascal distributed Rosado campaign hats to individuals in the CSO parking lot.

103. During regular Command Staff meetings throughout 2024 and 2025, Pascal discussed CSO employees' social media activity and/or lack thereof with respect to Rosado's

campaigns and the election, such as CSO employees' social media comments related to the election and sharing of election-related content.

104. During 2025, Pascal encouraged CSO employees to engage in social media activity in support of Rosado's candidacy for Chesapeake Sheriff.

105. During 2025, Pascal criticized CSO employees who did not show adequate support or engage in adequate campaign activity or social media activity in support of Rosado's candidacy for Chesapeake Sheriff.

106. On at least one occasion in 2024, in a conversation with a CSO employee, Pascal criticized that employee's family member for supporting Rosado's opponent on social media.

107. CSO employees feared retaliation for not supporting, or not adequately supporting, Rosado's campaigns for Chesapeake Sheriff.

108. The constant pressure on CSO employees to support Rosado's candidacy and to engage in campaign activities on his behalf adversely impacted CSO staff morale as well as the personal lives and familial relationships of some who dedicated substantial personal time to supporting the campaign in addition to their regular official CSO responsibilities.

II. STATEMENT OF CHARGES

A. Count One: Violation of 5 U.S.C. § 1502(a)(1) and 5 C.F.R. § 151.121(a) – Pascal used his official authority or influence for the purpose of interfering with or affecting the result of an election or a nomination for office.

109. Paragraphs one through 108 are hereby incorporated by reference.

110. Pascal, at all times relevant to this Complaint, was responsible for all aspects of CSO operations.

111. The CSO received federal funding as described in paragraph 15 and subparagraphs (a) through (e).

112. Accordingly, Pascal had duties in connection with activities financed in whole or in part by federal loans or grants.

113. Therefore, Pascal was covered by the Hatch Act at all times relevant to this Complaint.

114. By engaging in the conduct described in paragraphs 24 through 108, Pascal repeatedly used his official authority and influence for the purpose of affecting the result of the election for Chesapeake Sheriff when he: used subordinate CSO employees to sell campaign fundraiser tickets, run campaign events, canvass for votes, and otherwise support Rosado's campaign; solicited campaign donations and other support from CSO employees; and used official CSO events, run by CSO employees, for campaign purposes.

THEREFORE, by engaging in the above-described conduct, Respondent Pascal violated 5 U.S.C. § 1502(a)(1) and 5 C.F.R. § 151.121(a).

B. Count Two: Violation of 5 U.S.C. § 1502(a)(2) and 5 C.F.R. § 151.121(b) – Pascal directly or indirectly coerced, attempted to coerce, commanded, or advised a state or local officer or employee to pay, lend, or contribute anything of value to a party, committee, organization, agency, or person for political purposes.

115. Paragraphs one through 108 and 110 through 113 are hereby incorporated by reference.

116. By engaging in the conduct described in paragraphs 24 through 108 – specifically with respect to using subordinate CSO employees’ money, time, and effort to run Rosado’s campaign – Pascal directly or indirectly coerced, attempted to coerce, commanded, or advised CSO employees to pay or contribute a thing or things of value for his campaigns for sheriff.

THEREFORE, by engaging in the above-described conduct, Respondent Pascal violated 5 U.S.C. § 1502(a)(1) and (2) and 5 C.F.R. § 151.121(a),(b).

WHEREFORE, Respondent Pascal violated 5 U.S.C. § 1502(a)(1) and (2) and 5 C.F.R. § 151.121(a),(b), OSC requests the Board find that Pascal violated the Hatch Act and determine that these violations warrant Pascal’s removal from his office or employment pursuant to 5 U.S.C. § 1505.

Respectfully submitted,

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