



April 24, 2025

U.S. Office of Congressional Conduct
425 3rd Street, SW Suite 1110
Washington, DC 20024

Sent via email (oce@mail.house.gov)

Dear Office of Congressional Conduct:

Campaign Legal Center (“CLC”) respectfully requests that the Office of Congressional Conduct (“OCC”) investigate whether 19 representatives violated House rules prohibiting the acceptance of campaign contributions linked to official actions. Specifically, Elon Musk donated \$6,600¹ to 18 lawmakers and \$5,800² to one lawmaker in connection with their official actions limiting the power of and impeaching federal judges. Sixteen of these lawmakers received contributions within one business day of taking official action.

In the weeks leading up to the official actions and connected donations, Musk made repeated public calls to Congress to impeach federal judges. As demonstrated in the chart below, the timing and recipients of these contributions,³ as well as Musk’s public statements, strongly suggest that these political donations were given to reward or incentivize lawmakers’ official actions.

Voters trust their representatives to use their power in the public’s best interest, not in the interests of wealthy campaign donors. Lawmakers threaten this

¹ \$6,600 was the maximum individual hard dollar campaign contribution allowed (totaling primary and general allowed amount) by federal law until the maximum was increased earlier this year. See FEC, Contribution limits for 2023-24 (Feb. 2023), https://www.fec.gov/resources/cms-content/documents/contribution_limits_chart_2023-2024.pdf.

² \$5,800 was the maximum individual hard dollar campaign contribution allowed by federal law (totaling primary and general allowed amount) during the 2021-22 election cycle. See FEC, Contribution limits for 2021-22 (Jan. 2021), https://www.fec.gov/resources/cms-content/documents/contribution_limits_chart_2021-2022.pdf.

³ See Appendix for citations to Musk’s 2025 contributions to House members.

public trust when they accept campaign contributions that a donor links to an official act. Unless the contributions are returned, this conduct at the very least appears corrupt, and it suggests that lawmakers are willing to perform official actions for the right price. OCC should investigate whether these members have violated House rules or federal law by accepting campaign contributions linked to official actions.

I. House Rules Prohibit Members of Congress from Accepting Campaign Contributions A Donor Links to Any Official Action

The House gift rule prohibits members from accepting any gift, including contributions, that a donor links to official acts:

“[A] Member or employee may not accept any contribution that the donor links to any official action that the Member or employee has taken, or is being asked to take. In this respect, a campaign or political contribution is treated like any other gift, and acceptance of a contribution in these circumstances may implicate a provision of the federal gift statute (5 U.S.C. § 7353) or the criminal statutes on bribery and illegal gratuities.”⁴

While members may accept lawfully-made campaign contributions, “no campaign contribution that is linked to an official action is ever acceptable.”⁵ These restrictions apply to such gifts regardless of whether the member is engaging in a quid pro quo or being offered a reward for official actions.⁶

An otherwise lawful campaign contribution becomes impermissible when there is a link between the contribution and an identifiable official act, including if the contribution was given “for or because of any official act performed.”⁷ Gifts given as expressions of goodwill or appreciation not tied to a specific official action are permissible.⁸

An “official action” is “any decision or action on any question, matter, cause, suit, proceeding or controversy, which may at any time be pending, or which may by law be brought before any public official, in such official’s official capacity, or in such official’s place of trust or profit.”⁹ Federal law requires that an official act involve a formal exercise of governmental power.¹⁰ Introducing and sponsoring

⁴ *House Ethics Manual*, 117th Cong., 159 (2022), <https://ethics.house.gov/wp-content/uploads/2023/12/Dec-2022-House-Ethics-Manual-website-version.pdf>.

⁵ *Id.*

⁶ *Id.* at 31.

⁷ *United States v. Sun-Diamond Growers of California*, 526 U.S. 398, 400 (1999) (quoting 18 U.S.C. § 201(c)(1)(A)).

⁸ *House Ethics Manual*, *supra* note 4, at 32.

⁹ *Id.* at n. 18; 18 U.S.C. § 201(a)(3).

¹⁰ *McDonnell v. United States*, 579 U.S. 550, 568 (2016).

legislation and resolutions are considered official actions: “voting is a legislator’s quintessential ‘official act,’” and “agreeing to intervene with one’s colleagues to secure their support for legislation involves an ‘official act.’”¹¹

The House Ethics Manual provides the following example of an impermissible gift linked to an official action (introducing and managing a bill through passage):

“A Member introduces legislation and manages the bill through passage solely because she believes it will benefit the country. A lawyer also favors the legislation because it will benefit his clients. The lawyer sends the Member a book valued at less than \$50 with a note that expresses appreciation for the Member’s work on the bill. The Member may not accept the book from the lawyer and must return it to the lawyer.”¹²

Where a member receives an impermissible gift, they must take appropriate action to return the gift.¹³

II. Elon Musk’s Contributions to 19 Members Appear to be Linked to Their Official Actions Relating to Federal Judges

The recipients and timing of Musk’s contributions, along with his public statements, strongly suggest the contributions were linked to official actions. Between March 18, 2025, and March 25, 2025, Musk contributed to the primary campaign committees of 19 members. Of these members, 16 took official action related to federal judges within one business day of receiving the contributions from Musk; the other three did so within a week of receiving their contribution.

Members of Congress Who Received Contributions from Elon Musk

Member of Congress	Contribution Date¹⁴	Official Action	Date of Official Action
Lauren Boebert	Mar. 19	Cosponsored Articles of Impeachment against Judge Boasberg ¹⁵	Mar. 21

¹¹ United States v. Carpenter, 961 F.2d 824, 827 (9th Cir. 1992).

¹² *House Ethics Manual*, *supra* note 4, at 32-33.

¹³ *Id.* at 34.

¹⁴ See Appendix.

¹⁵ H.R. Res. 229, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/house-resolution/229/cosponsors>.

Member of Congress	Contribution Date¹⁴	Official Action	Date of Official Action
Eric Burlison	Mar. 24	Cosponsored Articles of Impeachment against Judge McConnell ¹⁶	Mar. 24
		Cosponsored Articles of Impeachment against Judge Engelmayer ¹⁷	Mar. 25
		Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 21
Buddy Carter	Mar. 24	Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 18
Andrew Clyde	Mar. 19	Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 18
		Cosponsored Articles of Impeachment against Judge Engelmayer	Mar. 4
		Introduced Articles of Impeachment against Judge McConnell	Mar. 24
Mike Collins	Mar. 24	Cosponsored Articles of Impeachment against Judge Engelmayer	Mar. 25
		Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 18
Eli Crane	Mar. 19	Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 18
		Cosponsored Articles of Impeachment against Judge McConnell	Mar. 24

¹⁶ H.R. Res. 241, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/house-resolution/241/cosponsors>.

¹⁷ H.R. Res. 145, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/house-resolution/145/cosponsors>.

Member of Congress	Contribution Date¹⁴	Official Action	Date of Official Action
Warren Davidson	Mar. 24	Cosponsored Articles of Impeachment against Judge Chuang ¹⁸	Mar. 24
		Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 21
Brandon Gill	Mar. 19	Introduced Articles of Impeachment against Judge Boasberg	Mar. 18
		Cosponsored Articles of Impeachment against Judge McConnell	Mar. 24
Abraham Hamadeh	Mar. 24	Cosponsored of Articles of Impeachment against Judge Boasberg	Mar. 21
Mark Harris	Mar. 24	Cosponsored Articles of Impeachment against Judge Engelmayer	Mar. 25
		Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 21
		Cosponsored No Rogue Rulings Act of 2025 ¹⁹	Mar. 21
Anna Paulina Luna	Mar. 24	Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 21
		Cosponsored No Rogue Rulings Act of 2025	Mar. 21
John McGuire	Mar. 25	Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 24
		Cosponsored No Rogue Rulings Act of 2025	Mar. 24
Mary Miller	Mar. 25	Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 24

¹⁸ H.R. Res. 246, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/house-resolution/246/cosponsors>.

¹⁹ H.R. 1526, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/house-bill/1526/cosponsors>.

Member of Congress	Contribution Date¹⁴	Official Action	Date of Official Action
Andy Ogles	Mar. 19	Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 26
		Introduced Articles of Impeachment against Judge Chuang	Mar. 24
Michael Rulli	Mar. 25	Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 24
Marlin Stutzman	Mar. 24	Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 21
Marjorie Taylor Greene	Mar. 24	Cosponsored Articles of Impeachment against Judge McConnell	Mar. 24
		Cosponsored Articles of Impeachment against Judge Ali ²⁰	Mar. 24
		Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 21
		Cosponsored Articles of Impeachment against Judge Bates ²¹	Mar. 24
		Cosponsored Articles of Impeachment against Judge Engelmayer ²²	Mar. 21
		Cosponsored Articles of Impeachment against Judge Engelmayer	Mar. 25
Keith Self	Mar. 24	Cosponsored No Rogue Rulings Act of 2025	Mar. 24
		Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 21

²⁰ H.R. Res.174, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/house-resolution/174/cosponsors>

²¹ H.R. Res.157, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/house-resolution/157/cosponsors>.

²² H.R. Res.143, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/house-resolution/143/cosponsors>.

Member of Congress	Contribution Date ¹⁴	Official Action	Date of Official Action
Tony Wied	Mar. 24	Cosponsored Articles of Impeachment against Judge Boasberg	Mar. 21

Musk made these contributions within days of making public statements adamantly encouraging members of Congress to support the impeachment of federal judges, both through the introduction of articles of impeachment and through legislation that would facilitate impeachment proceedings. These statements are evidence that Musk’s intention with his campaign contributions was to reward those who took specific actions to advance his priorities.

On March 16, Musk reposted a statement from Rep. Gill announcing that he planned to file articles of impeachment against Judge Boasberg. Musk posted the announcement with the added comment, “Necessary.”²³ On March 19, Rep. Ogles posted a response to Chief Justice John Roberts’ comments condemning impeachment as a response to disagreement concerning judicial decisions, saying, “Respectfully, Mr. Chief Justice, both James Madison and Thomas Jefferson disagree with you. So does the Constitution. We are going to keep the impeachments coming.”²⁴ Musk reposted Rep. Ogles’ comment with the added text: “For more than two centuries, there has never [been] such extreme abuse of the legal system by activists pretending to be judges. Impeach them [federal judges].”²⁵

Also on March 19, Musk reposted a tweet from Charlie Kirk, a media personality, that was critical of a district court judge’s decision. Musk added: “This is a judicial coup. We need 60 senators to impeach the judges and restore rule of the people.”²⁶ On March 20, Musk posted a tweet critical of Judge James Boasberg, saying, “He’s a radical activist cosplaying as a judge.”²⁷ On March 20, Musk’s America PAC publicized an offer to give \$100 to registered voters in Wisconsin who signed a petition “in opposition to activist judges.”²⁸ These statements show that

²³ Elon Musk (@elonmusk), X (Mar. 16, 2025, 4:56 AM), <https://x.com/elonmusk/status/1901195900568928406>.

²⁴ Rep. Andy Ogles (@repogles), X (Mar. 18, 2025, 1:56 PM), <https://x.com/RepOgles/status/1902056498370425197>.

²⁵ Elon Musk (@elonmusk), X (Mar. 19, 2025, 10:39 AM), <https://x.com/elonmusk/status/1902369234442686852>.

²⁶ Elon Musk (@elonmusk), X (Mar. 19, 2025, 10:14 AM), <https://x.com/elonmusk/status/1902363014340165743>.

²⁷ Elon Musk (@elonmusk), X (Mar. 20, 2025, 1:42 PM), <https://x.com/elonmusk/status/1902777732749992335>. “Cosplay” is a reference to the practice of dressing up as a character from a work of fiction.

²⁸ Theodore Schleifer, *Musk Offers \$100 to Wisconsin Voters, Bringing Back a Controversial Tactic*, N.Y. Times (Mar. 20, 2025), <https://www.nytimes.com/2025/03/20/us/politics/elon-musk-wisconsin-petition.html>.

Musk was intent on impeaching federal judges, and his campaign contributions to those that took the actions he wanted were linked to those actions.

III. There is Reasonable Basis for OCC to Open a Preliminary Review

Pursuant to Rule 7 of the OCC Rules for the Conduct of Investigations, “[t]he Board shall authorize a preliminary review of any allegation(s) when it determines there is a *reasonable basis* to believe the allegation(s) based on all the information then known to the Board.”²⁹ The OCC applies this low legal standard of proof to initiate preliminary reviews, then applies the higher standards of “probable cause” and “substantial reason to believe” to initiate second-phase reviews and referrals to the Committee on Ethics. “A *reasonable basis* to believe the allegation(s) exists when there is a reasonable and articulable basis for believing the allegation(s).”³⁰

Musk’s statements clearly show that he supports impeaching federal judges who make rulings he disapproves of and wants to limit their power; but more importantly, he engaged in an active campaign to ensure members of Congress pursued the actions he desired. His campaign contributions appear to be linked to members’ official actions and were either a reward or an incentive for lawmakers who complied. For these reasons, there is reasonable basis for OCC to open a preliminary review to determine whether Musk’s contributions were in fact impermissible gifts under House rules.

IV. Conclusion

Members of Congress are required to return gifts that were improperly given because they were linked to an official action. Musk’s contributions to the primary campaign committees of House members appear to have been linked to those lawmakers’ official actions related to limiting the power of and impeaching federal judges.

For the foregoing reasons, CLC requests that the OCC Board authorize a preliminary review of this matter. We acknowledge that 18 U.S.C. § 1001 applies to the information provided.

Respectfully submitted,

_____/s/_____
Delaney Marsco
Director, Ethics

²⁹ Off. of Cong. Ethics, Rules for the Conduct of Investigations Rule 7(A), available at [OCE Rules for the Conduct of Investigation FINAL ADOPTED DEC 2022.pdf](#).

³⁰ *Id.*

_____/s/_____
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_____/s/_____
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Appendix

Contributions from Elon Musk to House Members in 2025

\$6,600 to Lauren Boebert on Mar. 19, 2025. Lauren Boebert for Congress, 2025 April Quarterly Report, FEC Form 3X at 13, 51 (Apr. 15, 2025),
<https://docquery.fec.gov/pdf/171/202504159756050171/202504159756050171.pdf>.

\$6,600 to Eric Burlison on Mar. 24, 2025. Eric Burlison for Congress, 2025 April Quarterly Report, FEC Form 3X at 95 (Apr. 15, 2025),
<https://docquery.fec.gov/pdf/203/202504159755640203/202504159755640203.pdf>.

\$6,600 to Buddy Carter on Mar. 24, 2025. Buddy Carter for Congress, 2025 April Quarterly Report, FEC Form 3X at 30 (Apr. 15, 2025),
<https://docquery.fec.gov/pdf/940/202504159755542940/202504159755542940.pdf>.

\$6,600 to Andrew Clyde on Mar. 19, 2025. Clyde for Congress, Inc., 2025 April Quarterly Report, FEC Form 3X at 9-10 (Apr. 15, 2025),
<https://docquery.fec.gov/pdf/961/202504159755357961/202504159755357961.pdf>.

\$6,600 to Mike Collins on Mar. 24, 2025. Collins for Congress, 2025 April Quarterly Report, FEC Form 3X at 470-471 (Apr. 15, 2025),
<https://docquery.fec.gov/pdf/899/202504159755650899/202504159755650899.pdf>.

\$5,800 to Eli Crane on Mar. 19, 2025. Eli Crane for Congress, 2025 April Quarterly Report, FEC Form 3X at 5123 – 5124 (Apr. 14, 2025),
<https://docquery.fec.gov/pdf/520/202504149755304520/202504149755304520.pdf>.

\$6,600 to Warren Davidson on Mar. 24, 2025. Davidson for Congress, 2025 April Quarterly Report, FEC Form 3X at 8 (Apr. 14, 2025),
<https://docquery.fec.gov/pdf/910/202504149755328910/202504149755328910.pdf>.

\$6,600 to Brandon Gill on Mar. 19, 2025. Brandon Gill for Texas, 2025 April Quarterly Report, FEC Form 3X at 32-33 (Apr. 15, 2025),
<https://docquery.fec.gov/pdf/910/202504159755807910/202504159755807910.pdf>.

\$6,600 to Abraham Hamadeh on Mar. 24, 2025. Abe for Arizona, 2025 April Quarterly Report, FEC Form 3X at 64 (Apr. 15, 2025),
<https://docquery.fec.gov/pdf/950/202504159755648950/202504159755648950.pdf>.

\$6,600 to Mark Harris on Mar. 24, 2025. Mark Harris for Congress, 2025 April Quarterly Report, FEC Form 3X at 14 (Apr. 11, 2025),
<https://docquery.fec.gov/pdf/813/202504119755209813/202504119755209813.pdf>.

\$6,600 to Anna Paulina Luna on Mar. 24, 2025. Anna Paulina Luna for Congress, 2025 April Quarterly Report, FEC Form 3X at 67, 105 (Apr. 15, 2025),
<https://docquery.fec.gov/pdf/932/202504159755595932/202504159755595932.pdf>.

\$6,600 to John McGuire on Mar. 25, 2025. McGuire for Virginia, 2025 April Quarterly Report, FEC Form 3X at 14 (Apr. 15, 2025),
<https://docquery.fec.gov/pdf/759/202504159755352759/202504159755352759.pdf>.

\$6,600 to Mary Miller on Mar. 25, 2025. Mary Miller for Congress, 2025 April Quarterly Report, FEC Form 3X at 47 (Apr. 15, 2025),
<https://docquery.fec.gov/pdf/989/202504159755953989/202504159755953989.pdf>.

\$6,600 to Andy Ogles on Mar. 19, 2025. Andy Ogles for Congress, 2025 April Quarterly Report, FEC Form 3X at 8-9 (Apr. 15, 2025),
<https://docquery.fec.gov/pdf/898/202504159755396898/202504159755396898.pdf>.

\$6,600 to Michael Rulli on Mar. 25, 2025. Rulli for Ohio, 2025 April Quarterly Report, FEC Form 3X at 18-19 (Apr. 15, 2025),
<https://docquery.fec.gov/pdf/713/202504159755370713/202504159755370713.pdf>.

\$6,600 to Marlin Stutzman on Mar. 24, 2025. Stutzman for Congress, 2025 April Quarterly Report, FEC Form 3X at 24-25 (Apr. 10, 2025),
<https://docquery.fec.gov/pdf/855/202504159755352855/202504159755352855.pdf>.

\$6,600 to Marjorie Taylor Greene on Mar. 24, 2025. Greene for Congress Inc., 2025 April Quarterly Report, FEC Form 3X at 809-811 (Apr. 15, 2025),
<https://docquery.fec.gov/pdf/104/202504159755545104/202504159755545104.pdf>.

\$6,600 to Keith Self on Mar. 24, 2025. Self for Congress, 2025 April Quarterly Report, FEC Form 3X at 12-13 (Apr. 10, 2025),
<https://docquery.fec.gov/pdf/205/202504109755202205/202504109755202205.pdf>.

\$6,600 to Tony Wied on Mar. 24, 2025. Tony Wied for Congress, 2025 April Quarterly Report, FEC Form 3X at 60-61 (Apr. 15, 2025),
<https://docquery.fec.gov/pdf/480/202504159755657480/202504159755657480.pdf>.