



August 22, 2025

Representatives Nathaniel Moran and Sylvia R. Garcia
U.S. House of Representatives
Committee on Ethics
1015 Longworth House Office Building
Washington, DC 20515

(sent via email Ethics.Comments@mail.house.gov)

Dear Representatives Moran and Garcia:

Campaign Legal Center (“CLC”) writes in response to the U.S. House Committee on Ethics’ (“Committee”) request for public comment. Specifically, the Committee appointed a bipartisan working group that is seeking “recommendations to improve, clarify, and modernize the Committee’s guidance regarding campaign activity by House members, officers, and employees.” CLC believes that modernizing the transparency of its prior applications and enforcement of campaign activity guidance would be most instructive for members of Congress.

Widespread compliance with ethics laws and rules requires not only guidance for how to comply, but also awareness that non-compliance results in consequences. The Committee’s written guidance in the House Ethics

Manual is generally clear and detailed for most issues involving campaign activity. The current problem, however, is that there is no simple method for House members or anyone else to know how the Committee has enforced the campaign activity guidance it provides. Increasing visibility of the Committee's application of their guidance in actual cases would greatly support its efforts to deter non-compliance.

The Committee's enforcement actions from 1967 to 2025 are published on its website as "Committee Reports," listed chronologically with a title that includes the name of the member involved. The nearly 60 years of reports include findings on alleged campaign activity violations, but this information cannot be found without opening and reading each report. As a result, the Committee's application of its campaign activity rules and guidance is not truly transparent because it is not readily accessible.

House members, officers, and employees depend on reports of enforcement actions to better understand whether the facts in their individual circumstances are likely a violation of the guidance. CLC recommends that the Committee consider the low cost, but highly beneficial, step of providing a database on its website that increases transparency by listing all members of Congress who have been the subject of an action on a landing page and hyperlinking the investigations. The list should be searchable by name and sortable by name, date, the state the member of Congress or staff member represents, the nature of violation, and committee

action. This system would allow anyone, including Committee staff, who searches for the Committee's legal determinations on campaign activity violations to easily sort, find, and review relevant matters.

CLC is a nonpartisan, nonprofit organization dedicated to protecting and strengthening democracy across all levels of government. CLC works to enforce and reform ethics laws to ensure that our democracy is trustworthy, accountable, and responsive. Thank you for the opportunity to comment on this important topic. We are available for any additional questions that you may have.

Respectfully submitted,

_____/s/_____
Kedric L. Payne
General Counsel, Vice President, and
Sr. Director, Ethics

_____/s/_____
Delaney Marsco
Director, Ethics