



July 10, 2026

Chair Karen L. Haas
Co-Chair Bill Luther
Office of Congressional Ethics
425 3rd Street, SW Suite 1110
Washington, DC 20024

Submitted via form and sent via email (conduct@mail.house.gov)

Dear Chair Haas and Co-Chair Luther:

Campaign Legal Center (“CLC”) respectfully requests that the Office of Congressional Conduct (“OCC”) investigate whether Representative Henry Cuellar violated financial disclosure requirements. Specifically, Rep. Cuellar’s 2025 financial disclosure statements do not include the assets that he purportedly used to personally loan a total of \$238,000 to his campaign committee in 2025.¹ This highly irregular discrepancy raises questions about the true source of the loan to the campaign committee and provides reasonable basis for the OCC to investigate whether Rep. Cuellar complied with the Ethics in Government Act (“EIGA”) and House rules.

CLC reviewed all publicly available 2025 financial disclosure reports for House members who made substantial personal loans to their campaign committees in 2025. Rep. Cuellar is the only member we identified who apparently had insufficient personal funds to support a personal loan to a campaign. These unexplained inconsistencies in his reported finances create concerns for voters about the transparency of their elected representative. The public has a right to know the sources of money that may be used to influence a federal election, as well as potential conflicts that may arise due to a member’s financial interests. An OCC investigation is necessary to determine whether Rep. Cuellar completely and

¹ Henry Cuellar 2025 Financial Disclosure Report (May 15, 2026), https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2025/10077167.pdf, attached as Exhibit A.

accurately disclosed his financial interests in compliance with House rules and federal law.

The House has established that false reporting of personal loans to a campaign committee is a serious violation of the law and public trust. For example, the OCC, House Ethics Committee, and Department of Justice recently conducted separate investigations of Representative George Santos and Representative Andy Ogles concerning allegations of false reporting to the Federal Election Commission (“FEC”) of personal loans to their campaign committees when they did not have the personal funds to make such loans.² Similarly, Rep. Cuellar’s inconsistent disclosures should prompt a serious fact-finding.

I. Federal Law and House Rules Require Candidates to File Accurate and Complete Financial Disclosure Statements

Pursuant to 5 U.S.C. § 13106(a)(2) of the EIGA, all candidates and members of Congress are required to file accurate financial disclosure reports. “It shall be unlawful for any person to knowingly and willfully (i) falsify any information that such person is required to report under section 13104 of this title; and (ii) fail to file or report any information that such person is required to report under section 13104 of this title.”³

Required disclosures “include a full and complete statement with respect to the . . . source, type, and amount or value of income . . . from any source.”⁴ In filing financial disclosure reports, members must disclose “all interest-bearing cash deposit accounts, including those held at banks, credit unions, savings, and loan associations, as well as checking and savings accounts, passbooks, money market accounts or funds”⁵

² Off. of Cong. Ethics, *OCE Referral Regarding Rep. George Santos* (May 1, 2023), <https://conduct.house.gov/reports/investigations/oce-referral-regarding-rep-george-santos>; Off. Of Cong. Ethics, *OCE Referral Regarding Rep. Andy Ogles* (Jun. 20, 2024), <https://ethics.house.gov/wp-content/uploads/2025/01/OCE-Report-and-Findings.pdf> ; H.R. COMM. ON ETHICS, H.R. REP. NO. 118-274 (2023), <https://www.congress.gov/118/crpt/hrpt274/CRPT-118hrpt274.pdf>; H.R. COMM. ON ETHICS, *Statement of the Committee on Ethics Regarding Representative Andy Ogles* (Jan, 2, 2025), <https://ethics.house.gov/wp-content/uploads/2025/01/Press-Release-1-Ogles.pdf>; DEP’T OF JUSTICE PRESS RELEASE, *Former Congressman George Santos Pleads Guilty to Fraud and Identity Theft* (updated February 6, 2025), <https://www.justice.gov/archives/opa/pr/former-congressman-george-santos-pleads-guilty-fraud-and-identity-theft>; Luke Broadwater, *F.B.I. Seizes Republican Lawmaker’s Phone Amid Scrutiny Over Loan*, NY TIMES (Aug. 6. 2024), <https://www.nytimes.com/2024/08/06/us/politics/andy-ogles-phone-fbi-search.html>.

³ 5 U.S.C. § 13106(a)(2).

⁴ 5 U.S.C. § 13104(a)(1)(A).

⁵ H.R. COMM. ON ETHICS, 2026 Instruction Guide for Financial Disclosure Reports for Calendar Year 2025, 33, [New-2026-Instruction-Guide-Published-5-26-2026-1.pdf](#).

II. Rep. Cuellar’s Financial Disclosure Statements Appear to be Inaccurate and Incomplete

The information in Rep. Cuellar’s financial disclosure statements calls into question whether he accurately reported his assets and liabilities.

Rep. Cuellar’s disclosed assets do not show sufficient liquidity for him to loan his campaign committee \$238,000, which he reported in his filings with the FEC.⁶ Rep. Cuellar’s assets do not include any bank accounts. He disclosed four retirement accounts but does not report any withdrawals from those accounts.⁷ The screenshots below capture the two loans Rep. Cuellar reported on his financial disclosure statements totaling \$238,000.

NAME OF COMMITTEE (In Full) Texans for Henry Cuellar Congressional Campaign		Transaction ID : 8443164L	
LOAN SOURCE Full Name (Last, First, Middle Initial) Cuellar, Henry, , ,		<input type="checkbox"/> Memo Item	Election: 2026 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
Mailing Address 1519 Washington St Ste 200 City Laredo		State TX	ZIP Code 78040-4412
		<input checked="" type="checkbox"/> Personal Funds of the Candidate	
Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period	
38000.00	0.00	38000.00	
TERMS		Date Incurred	Date Due
		M M / D D / Y Y Y Y 10 / 10 / 2025	M M / D D / Y Y Y Y none
		Interest Rate (If none, enter 0)	Secured:
		0.00 % (apr)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

⁶ Texans for Henry Cuellar Congressional Campaign Schedule C Form, 2026 Election (Jun. 6, 2025), <https://docquery.fec.gov/pdf/515/202605279870289515/202605279870289515.pdf#page=199>, attached as Exhibit B; Texans for Henry Cuellar Congressional Campaign Schedule C Form, 2026 Election (Oct. 10, 2025), <https://docquery.fec.gov/pdf/515/202605279870289515/202605279870289515.pdf#page=200>, attached as Exhibit C.

⁷ Members of Congress are required to report disbursements from their 401(k) accounts. H.R. COMM. ON ETHICS, *supra* note 5, at 78.

NAME OF COMMITTEE (In Full) Texans for Henry Cuellar Congressional Campaign		Transaction ID : 8338698L	
LOAN SOURCE Full Name (Last, First, Middle Initial) Cuellar, Henry, , ,		<input type="checkbox"/> Memo Item	
Mailing Address 1519 Washington St Ste 200		Election: 2026 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	
City Laredo	State TX	ZIP Code 78040-4412	<input checked="" type="checkbox"/> Personal Funds of the Candidate
Original Amount of Loan 200000.00	Cumulative Payment To Date 0.00	Balance Outstanding at Close of This Period 200000.00	
TERMS Date Incurred M M / D D / Y Y Y Y 06 / 06 / 2025		Date Due M M / D D / Y Y Y Y none	Interest Rate (If none, enter 0) 0.00 % (apr)
		Secured: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Rep. Cuellar reports two categories of income. According to his disclosure, he received rental income from four rental properties in 2025, totaling from \$37,505 to \$120,000. His second source of income in 2025 was \$70,444 from pensions held by Rep. Cuellar and his spouse. Even assuming that Rep. Cuellar received the highest rental income possible as reported—\$120,000—that amount, combined with the \$70,444 in pension income, is still not enough to cover the \$238,000 reported in total loans.

More importantly, Rep. Cuellar lists liabilities that are personal and business loans, totaling from \$300,004 to \$700,000. Such liabilities suggest that only a limited amount of income received could have been loaned to the campaign and could not have covered the reported \$238,000 in loans.

SCHEDULE D: LIABILITIES

Owner	Creditor	Date Incurred	Type	Amount of Liability
JT	International Bank of Commerce	03/2009	Business and personal loans	\$100,001 - \$250,000
JT	Wells Fargo	07/2010	Loan #1 for personal residence in Washington, DC	\$50,001 - \$100,000
JT	First Service Residential	07/2010	Loan #2 for personal residence in Washington, DC	\$100,001 - \$250,000
JT	International Bank of Commerce	05/2010	Loan for personal residence in Laredo, TX	\$100,001 - \$250,000

If Rep. Cuellar claims that he used his reported home mortgages to make the loan, federal election law required disclosure of the mortgage as the source of the loan on his campaign committee reports.⁸ To the contrary, the campaign committee's FEC disclosure reports list the \$238,000 as loans from Rep. Cuellar's personal funds.

The discrepancies in Rep. Cuellar's financial disclosure statements do not have any obvious explanations on the public record, and he should provide answers to the public.

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.”⁹ The OCC applies this low legal standard of proof to initiate preliminary reviews, while applying the higher standards of “probable cause” and “substantial reason to believe” to initiate second-phase reviews and referrals to the Committee on Ethics.¹⁰ “A *reasonable basis* to believe the allegation(s) exists when there is a reasonable and articulable basis for believing the allegation(s).”¹¹

The information in Rep. Cuellar's financial disclosure reports conflicts with publicly available records of his assets and liabilities. Records establish that Rep. Cuellar claims to have given \$238,000 to his campaign, but his financial disclosure report does not show sufficient income, including the sale or transfer of any asset, to make such a loan. For these reasons, there is reasonable basis for OCC to open a preliminary review and request records confirming the source of the loan to his campaign.¹²

IV. Conclusion

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.

⁸ 11 C.F.R. § 104.3(d)(4).

⁹ Off. of Cong. Ethics, Rules for the Conduct of Investigations Rule 7(A), available at https://oce.house.gov/sites/evo-subsites/oce.house.gov/files/documents/OCE%20Rules%20for%20the%20Conduct%20of%20Investigation_FINAL%20ADOPTED%20DEC%202022.pdf (emphasis in original).

¹⁰ *Id.*

¹¹ *Id.* (emphasis in original).

¹² 52 U.S.C. § 30104(b)(2)-(3).

Respectfully submitted,

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

_____/s/_____
Danielle Caputo
Senior Legal Counsel, Ethics

_____/s/_____
Sophia Gonsalves-Brown
Senior Researcher, Campaign Finance and
Ethics

EXHIBIT A



FINANCIAL DISCLOSURE REPORT

Clerk of the House of Representatives • Legislative Resource Center • B81 Cannon Building • Washington, DC 20515

FILER INFORMATION

Name: Hon. Henry Cuellar
Status: Member
State/District: TX28

FILING INFORMATION

Filing Type: Annual Report
Filing Year: 2025
Filing Date: 05/15/2026

SCHEDULE A: ASSETS AND "UNEARNED" INCOME

Asset	Owner	Value of Asset	Income Type(s)	Income	Tx. > \$1,000?
Alliance Life Insurance Company of North America [WU]		\$1,001 - \$15,000	None		<input type="checkbox"/>
American General Life Insurance [WU]		\$15,001 - \$50,000	None		<input type="checkbox"/>
Blackrock Tempfund Cash Reserves Shares [MF]	SP	\$15,001 - \$50,000	Dividends	\$1 - \$200	<input type="checkbox"/>
Blackrock Tempfund Institutional Shares [MF]	SP	\$15,001 - \$50,000	Dividends	\$1 - \$200	<input type="checkbox"/>
Condo on Marcella St. [RP]		\$50,001 - \$100,000	Rent	\$5,001 - \$15,000	<input type="checkbox"/>
LOCATION: Laredo/ Webb, TX, US					
Global Gold Group, LLC, 60% Interest [OL]	SP	\$1 - \$1,000	None		<input type="checkbox"/>
LOCATION: Laredo/Webb, TX, US					
DESCRIPTION: A limited liability company that provides general consulting services.					
IRC Business Solutions, LLC, 100% Interest [OL]	SP	\$1 - \$1,000	None		<input type="checkbox"/>
LOCATION: Laredo/Webb, TX, US					
DESCRIPTION: A limited liability company that consults on business activities.					

Asset	Owner	Value of Asset	Income Type(s)	Income	Tx. > \$1,000?
IVCZ Parts, Supplies and Services, LLC, 50% Interest [OL] LOCATION: Laredo/ Webb, TX, US DESCRIPTION: A limited liability company that sells business parts, supplies and services. COMMENTS: Inactive/dormant	SP	\$1 - \$1,000	None		<input type="checkbox"/>
Property on Reynolds St. [RP] LOCATION: Laredo/ Webb, TX, US DESCRIPTION: Land and mobile home		\$50,001 - \$100,000	Rent	\$2,501 - \$5,000	<input type="checkbox"/>
Property on San Bernardo St. [RP] LOCATION: Laredo/Webb, TX, US DESCRIPTION: Property was disposed of in 2024 as a non-sale. The property did not exist in 2025.	JT	None	None		<input type="checkbox"/>
Property on Victoria St. [RP] LOCATION: Laredo/ Webb, TX, US	JT	\$250,001 - \$500,000	Rent	\$15,001 - \$50,000	<input type="checkbox"/>
Property on Washington St. [RP] LOCATION: Laredo/ Webb, TX, US	JT	\$250,001 - \$500,000	Rent	\$15,001 - \$50,000	<input type="checkbox"/>
Texas Prepaid Tuition Plan (DC #2) [5P] LOCATION: TX	JT	\$1,001 - \$15,000	None		<input type="checkbox"/>
TX State Retirement Account (Not Self Directed) [PE]	SP	Undetermined	Retirement	\$15,001 - \$50,000	<input type="checkbox"/>
TX State Retirement Account (Not Self-Directed) [PE]		Undetermined	Retirement	\$15,001 - \$50,000	<input type="checkbox"/>
401k State of Texas Comptroller ⇒ Blackrock Liquidity Funds Tempfund Institutional Shares [MF]	SP	\$100,001 - \$250,000	Tax-Deferred		<input type="checkbox"/>
401k State of Texas Comptroller ⇒ Wells Fargo Advantage DJ Target Today [MF]	SP	\$1,001 - \$15,000	Tax-Deferred		<input type="checkbox"/>

* Investment Vehicle details available at the bottom of this form. For the complete list of asset type abbreviations, please visit <https://fd.house.gov/reference/asset-type-codes.aspx>.

SCHEDULE B: TRANSACTIONS

None disclosed.

SCHEDULE C: EARNED INCOME

Source	Type	Amount
TX State Retirement Account	Pension	\$43,015.00
TX State Retirement Account	Spouse pension	\$27,429.00

SCHEDULE D: LIABILITIES

Owner	Creditor	Date Incurred	Type	Amount of Liability
JT	International Bank of Commerce	03/2009	Business and personal loans	\$100,001 - \$250,000
JT	Wells Fargo	07/2010	Loan #1 for personal residence in Washington, DC	\$50,001 - \$100,000
JT	First Service Residential	07/2010	Loan #2 for personal residence in Washington, DC	\$100,001 - \$250,000
JT	International Bank of Commerce	05/2010	Loan for personal residence in Laredo, TX	\$50,001 - \$100,000

SCHEDULE E: POSITIONS

Position	Name of Organization
Proprietor	H.C. Rentals
Advisory Council Member	Congressional Hispanic Caucus Institute Advisory Council
Board Member	Congressional Hispanic Leadership Institute

SCHEDULE F: AGREEMENTS

Date	Parties To	Terms of Agreement
September 2001	Myself and the State of Texas	Pension to be paid at qualifying age

SCHEDULE G: GIFTS

None disclosed.

SCHEDULE H: TRAVEL PAYMENTS AND REIMBURSEMENTS

None disclosed.

SCHEDULE I: PAYMENTS MADE TO CHARITY IN LIEU OF HONORARIA

None disclosed.

SCHEDULE A AND B INVESTMENT VEHICLE DETAILS

- 401k State of Texas Comptroller (Owner: SP)

EXCLUSIONS OF SPOUSE, DEPENDENT, OR TRUST INFORMATION

IPO: Did you purchase any shares that were allocated as a part of an Initial Public Offering?

Yes No

Trusts: Details regarding "Qualified Blind Trusts" approved by the Committee on Ethics and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or dependent child?

Yes No

Exemption: Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption?

Yes No

CERTIFICATION AND SIGNATURE

I CERTIFY that the statements I have made on the attached Financial Disclosure Report are true, complete, and correct to the best of my knowledge and belief.

Digitally Signed: Hon. Henry Cuellar , 05/15/2026

EXHIBIT B

SCHEDULE C (FEC Form 3) LOANS

NAME OF COMMITTEE (In Full) **Texans for Henry Cuellar Congressional Campaign** Transaction ID : **8338698L**

LOAN SOURCE Full Name (Last, First, Middle Initial)		<input type="checkbox"/> Memo Item	Election: 2026
Cuellar, Henry, , ,			<input checked="" type="checkbox"/> Primary
Mailing Address 1519 Washington St Ste 200			<input type="checkbox"/> General
City		State	ZIP Code
Laredo		TX	78040-4412
			<input checked="" type="checkbox"/> Personal Funds of the Candidate

Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
200000.00	0.00	200000.00

TERMS	Date Incurred	Date Due	Interest Rate (If none, enter 0)	Secured:
	M M / D D / Y Y Y Y 06 / 06 / 2025	M M / D D / Y Y Y Y none	0.00 % (apr)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

List All Endorsers or Guarantors (if any) to Loan Source

1. Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City	State
ZIP Code	Amount Guaranteed Outstanding:
2. Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City	State
ZIP Code	Amount Guaranteed Outstanding:
3. Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City	State
ZIP Code	Amount Guaranteed Outstanding:
4. Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City	State
ZIP Code	Amount Guaranteed Outstanding:

SUBTOTALS This Period This Page (optional).....▶	200000.00
TOTALS This Period (last page in this line only).....▶	

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

EXHIBIT C

SCHEDULE C (FEC Form 3)
LOANS

NAME OF COMMITTEE (In Full) **Texans for Henry Cuellar Congressional Campaign** Transaction ID : **8443164L**

LOAN SOURCE Full Name (Last, First, Middle Initial)		<input type="checkbox"/> Memo Item	Election: 2026
Cuellar, Henry, , ,			<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
Mailing Address 1519 Washington St Ste 200			
City	State	ZIP Code	<input checked="" type="checkbox"/> Personal Funds of the Candidate
Laredo	TX	78040-4412	

Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
38000.00	0.00	38000.00

TERMS	Date Incurred	Date Due	Interest Rate (If none, enter 0)	Secured:
	M M / D D / Y Y Y Y 10 / 10 / 2025	M M / D D / Y Y Y Y none	0.00 % (apr)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

List All Endorsers or Guarantors (if any) to Loan Source

1. Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City	State
ZIP Code	Amount Guaranteed Outstanding:
2. Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City	State
ZIP Code	Amount Guaranteed Outstanding:
3. Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City	State
ZIP Code	Amount Guaranteed Outstanding:
4. Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City	State
ZIP Code	Amount Guaranteed Outstanding:

SUBTOTALS This Period This Page (optional).....▶	38000.00
TOTALS This Period (last page in this line only).....▶	238000.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.