



October 2, 2017

The Honorable Johnny Isakson, Chair  
The Honorable Christopher A. Coons, Vice Chair  
Select Committee on Ethics  
United States Senate  
Room 220 Senate Hart Office Building  
Washington, D.C. 20530

Re: Request for Investigation of U.S. Senate Candidate Roy Moore

Dear Chairman Isakson and Vice Chairman Coons:

The Campaign Legal Center (“CLC”) respectfully requests an immediate investigation into whether U.S. Senate candidate Roy Moore failed to declare honoraria earned, liabilities owed, and compensation received on his financial disclosure statement, in violation of federal law and Senate rules.

Moore, the Republican nominee for U.S. Senate in Alabama, filed his Senate financial disclosure report with this office on June 26, 2017, and certified that “the statements I have made on this form are true, complete and correct to the best of my knowledge and belief.”<sup>1</sup> The instructions state that the reporting period for honoraria, income, assets and liabilities is the preceding calendar year and the current calendar year, up to the date of filing the report; in Moore’s case, this means the relevant reporting period is January 1, 2016 through June 27, 2017.<sup>2</sup>

Two months before Moore filed his Senate financial disclosure report, he filed a Statement of Economic Interests with the Alabama Ethics Commission similarly reflecting honoraria, income, assets and liabilities for calendar year 2016.<sup>3</sup>

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<sup>1</sup> Mr. Roy S. Moore, Senate Candidate Financial Disclosure Form, June 26, 2017 (“Senate Financial Disclosure Report”). Any person who knowingly and willfully falsifies or fails to disclose information required on this report is subject to civil penalties of up to \$50,000 and possible criminal sanctions. 5 U.S.C. app. § 104(a) and 18 U.S.C. § 1001.

<sup>2</sup> See Public Financial Disclosure Report for the United States Senate eDF Instructions (“Instructions”) at p.5, [https://www.ethics.senate.gov/public/index.cfm/files/serve?File\\_id=D8A43EB3-CF5B-479A-81F6-0C9CE4E2F03F](https://www.ethics.senate.gov/public/index.cfm/files/serve?File_id=D8A43EB3-CF5B-479A-81F6-0C9CE4E2F03F) (accessed Sept. 29, 2017).

<sup>3</sup> Mr. Roy S. Moore, Statement of Economic Interests, Alabama Ethics Commission, (“Alabama Statement of Economic Interest”), April 26, 2017, [http://ethics.alabama.gov/search/SOEI\\_Form.aspx?ssSOEI\\_ID=407816](http://ethics.alabama.gov/search/SOEI_Form.aspx?ssSOEI_ID=407816).

Comparing these reports, filed just two months apart, indicates that Moore has filed a false report with this committee.

In Part 1 of the Senate financial disclosure report, Moore answered “no” to the question of whether any individual or organization paid him or his spouse more than \$200 in honoraria for an article, speech, or appearance in 2016 and 2017.<sup>4</sup> However, in his Alabama Statement of Economic Interests, Moore stated that, in 2016 alone, he earned between \$50,000 and \$150,000 in honorariums for “speaking.”<sup>5</sup>

In Part 7 of the Senate financial disclosure report, liabilities, Moore answered “no” to the question of whether he, his spouse, or dependent child had any liability exceeding \$10,000 at any time during 2016 and 2017.<sup>6</sup> But Moore’s Alabama Statement of Economic Interests, which similarly applies to Moore, his spouse, and dependent children, states that as of December 31, 2016, he owed between \$150,000 and \$250,000 to one credit union or savings & loan association, and less than \$25,000 to two banks or credit card companies.<sup>7</sup>

In Part 10 of the Senate financial disclosure report, “compensation,” Moore was obligated to include all sources of compensation exceeding \$5,000 for work performed in 2015, 2016, and 2017, and a description of the nature of the services provided.<sup>8</sup> However, Moore declared that he did not earn any compensation during this period.<sup>9</sup>

Additionally, according to published reports, during 2017 Moore spoke at at least one fundraisers in Colorado “to help pay for his legal defense” after his suspension from the Alabama Supreme Court,<sup>10</sup> as well as other speaking engagements that may have included honoraria payments.<sup>11</sup> None of the proceeds

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<sup>4</sup> Senate Financial Disclosure Report, Part 1 at p.1. The instructions state that candidates must disclose the name and address of the source of honoraria income, as well as the date and description of the activity that generated the Honoria payment. *See* Instructions at 11.

<sup>5</sup> Alabama Statement of Economic Interests, Part 5 (“Other Income Information”) at p.2.

<sup>6</sup> Senate Financial Disclosure Report, Part 7 at p.3; *see also* Instructions at 22-23 (stating that the reporting obligation applies to liabilities exceeding \$10,000 “*at any time during the reporting period*” [emphasis in original]).

<sup>7</sup> Alabama Statement of Economic Interests, Part 7 (“Indebtedness Information”) at p.3. It is not clear whether these loans reflect a mortgage for Moore’s personal residence, which would not have to be disclosed on the Senate Financial Disclosure Report. However, the Alabama form includes a separate line for debt owed to “mortgage firms,” which Moore left blank, suggesting the debt is not for a mortgage. *Id.*

<sup>8</sup> *See* Instructions at 6.

<sup>9</sup> Senate Financial Disclosure Report, Part 10 at p.4.

<sup>10</sup> *See* Joey Bunch, *Suspended Alabama Judge Roy Moore Talks God and Schools at Colorado Capitol*, COLORADO SPRINGS GAZETTE (Apr. 8, 2017), <http://gazette.com/alabamas-judge-roy-moore-talks-god-and-schools-at-colorado-capitol/article/1600634>.

<sup>11</sup> *See, e.g.* Foundation for Moral Law, *From the Desk of Kayla Moore*, The Freedom Report: Official Newsletter of the Foundation for Moral Law (Mar. 28, 2017), <http://us10.campaign-archive1.com/?u=b72e11e92141d4d6306c8aa3e&id=e70f827de1> (noting that “Chief Justice Roy Moore, Alabama, will be speaking at Liberty University, Lynchburg, Virginia on March



raised for Moore's legal defense fund, or any honoraria he may have received for other speaking engagements, were reported on his Senate financial disclosure report.

Moore cannot claim that he was unaware of his income, assets or liabilities, given that he filed a substantially similar report with the Alabama Ethics Commission just two months before filing the Senate report. What's more, Moore is an attorney and was the Chief Justice of the Alabama Supreme Court until April of this year, so cannot claim that he was unable to grasp the basic legal responsibilities of filing a complete and accurate report.

CLC respectfully requests that the Select Committee on Ethics immediately commence an investigation to discover what information Moore has failed to disclose about his income, liabilities, and potential conflicts of interest.

Respectfully submitted,



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29, 2017"); Foundation for Moral Law, *Foundation for Moral Law First Quarter 2017 Report*, The Freedom Report: Official Newsletter of the Foundation for Moral Law (May 10, 2017), <http://us10.campaign-archive1.com/?u=b72e11e92141d4d6306c8aa3e&id=65589484cd> (noting seven speeches by Moore or his wife in the first quarter of 2017).