

July 22, 2024

Corey Amundson
Chief, Public Integrity Section
Department of Justice, Criminal Division
1301 New York Avenue, 10th Floor
Washington, DC 20005

Re: Request for Investigation into Senate Candidate Steve Garvey

Dear Mr. Amundson:

I am writing to request that the Department of Justice immediately investigate Mr. Steve Garvey, a candidate to represent California in the United States Senate, for apparent violations of federal law through his failure to make the disclosures required by the Ethics in Government Act of 1978 (the “*Act*”) on his personal financial disclosure report (“*PFD*”).

The Act was designed to “preserve and promote the integrity of public officials and institutions.”¹ Mr. Garvey has failed to comply with the Act’s requirements. A review of Mr. Garvey’s income, assets, and positions reveal numerous errors and omissions on his PFD, raising questions about the veracity of his entire disclosure.

California voters must have the opportunity to review *complete and accurate* reports to assess Mr. Garvey’s fitness for elected office.

I respectfully request that you immediately investigate this matter and take appropriate corrective action as soon as possible.

I. Factual Background

Mr. Garvey is currently running to represent California in the United States Senate.² As required by the Act, Mr. Garvey filed a PFD in connection with his Senate campaign on February 4, 2024 (the “*2024 PFD*”).³

On Part 1 of his PFD, Mr. Garvey answered “No” to the question “[d]id any individual or organization pay you or your spouse more than \$200, or donate any amount to a charity on your or your spouse’s behalf, for an article, speech, or appearance?”⁴ Yet, it has been reported that Mr. Garvey gave at least seven meet-and-greets and speeches in 2023 that were not campaign

¹ Ethics in Government Act, Pub. L. No. 95-521, 92 Stat. 1824, 1824 (1978).

² Steve Garvey, Statement of Candidacy, FEC Form 2 (filed Oct. 10, 2023), <https://docquery.fec.gov/pdf/462/202310109597436462/202310109597436462.pdf>.

³ Steve Garvey, Financial Disclosure Report (filed February 4, 2024), <https://efdsearch.senate.gov/search/view/annual/880f3eef-3eba-4bef-b7be-47665da3cbfb/> (hereinafter, “2024 Garvey PFD”).

⁴ 2024 Garvey PFD.

events.⁵ Three of the event organizers confirmed that they paid Mr. Garvey for his appearance, and the other four organizers either did not respond to a news reporter’s request or declined to comment.⁶ According to the news report, Mr. Garvey made appearances at multiple casinos and conferences for compensation.⁷ At least one event organizer confirmed that he paid Mr. Garvey \$5,000 for an appearance at a memorabilia shop.⁸

On Part 2 of his PFD, Mr. Garvey reported \$121,874 in earned income from various sources in 2023 through February 2, 2024.⁹ A list of this income is below:

Line	Who Was Paid	Type	Who Paid	Amount Paid
1	Self	Salary	GEP Talent Burbank, CA	\$486
2	Self	Salary	Fox Television New York, NY	\$5,000
3	Self	Self-Employment Income	The Topps Company New York, NY	\$22,688
4	Self	Self-Employment Income	IGP DXTRA, Inc. Omaha, NE	\$93,700

Mr. Garvey did not include any income from the website “Cameo” on his 2024 PFD. Cameo is a website where individuals pay celebrities to create a personalized video message for a fee.¹⁰ According to a review of Mr. Garvey’s Cameo profile, at least 32 users left reviews in 2023 for Mr. Garvey’s video messages.¹¹ Mr. Garvey sold his video messages for \$149 per video.¹²

On Part 3 of his PFD, Mr. Garvey did not report any personal savings accounts for himself or his wife.¹³ Mr. Garvey also did not report any assets for his wife.¹⁴ A list of Mr. Garvey’s reported assets is below:

⁵ Alex Schultz, *I Tried to Fact-Check the Resume of this MLB Star Turned Senate Candidate*, SLATE (May 29, 2024), <https://slate.com/news-and-politics/2024/05/steve-garvey-senate-california-schiff-baseball-porter-lee.html>.

⁶ *Id.*

⁷ *Id.*

⁸ *Id.*

⁹ 2024 Garvey PFD.

¹⁰ Cameo, About (last accessed June 27, 2024), <https://www.cameo.com/about>.

¹¹ See Cameo, Steve Garvey (last accessed June 27, 2024), <https://www.cameo.com/steveygarvey6>.

¹² Lois Beckett, *Could you win a US Senate primary without really trying? This ageing LA Dodger did it*, THE GUARDIAN (Mar. 7, 2024), <https://www.theguardian.com/us-news/2024/mar/07/steve-garvey-dodgers-baseball-california-us-senate>.

¹³ 2024 Garvey PFD.

¹⁴ *Id.*

Line	Asset	Type	Owner	Value	Income Type	Income
1	Major League Baseball Players Pension Plan	Retirement Plans Defined Benefit Pension Plan	Self	Unascertainable	Expected Investment Fund	\$50,001-\$100,000
2	Major League Baseball Group Trust	Retirement Plans Defined Benefit Pension Plan	Self	Unascertainable	Expected Investment Fund	\$5,001-\$15,000
3	AFTRA Retirement Fund	Retirement Plans Defined Benefit Pension Plan	Self	Unascertainable	Expected Investment Fund	\$5,001-\$15,000
4	Principal Life Insurance <i>Provider:</i> Principal	Life Insurance Whole	Self	Unascertainable	Other, (Payout from life insurance policy)	Other \$5,530

It was previously reported that Mr. Garvey was a “brand ambassador” for Kadenwood, Inc. and, as part of his brand ambassadorship, he was an investor in the company.¹⁵ Mr. Garvey’s investment in Kadenwood, Inc. was not included on Part 3 of his PFD.

On Part 8 of his PFD, Mr. Garvey answered “No” to the question “Did you hold any reportable outside positions during the reporting period?”¹⁶ Yet, Mr. Garvey appeared to hold several positions in 2023 and 2024.

- In 2024, Mr. Garvey was a “brand ambassador” for Kadenwood, Inc.¹⁷
- In 2023, Mr. Garvey’s website referenced “his position as President of Garvey Management Group.”¹⁸
- In 2023, Mr. Garvey was listed as a member of UCLA Neurosurgery Board of Advisors.¹⁹

¹⁵ Stephanie Watson, *Level Select CBD Oil Review: Tried And Tested*, FORBES (Apr. 30, 2024), <https://www.forbes.com/health/cbd/level-select-cbd-review/> (“Level Select works with a number of celebrity athlete ambassadors, including Steve Garvey [...]. ‘None of our athletes or ambassadors are paid cash by us. They’re all invested in the company (meaning they receive a share of the company profits),’ says Dickens.”).

¹⁶ 2024 Garvey PFD.

¹⁷ Stephanie Watson, *Level Select CBD Oil Review: Tried And Tested*, FORBES (Apr. 30, 2024), <https://www.forbes.com/health/cbd/level-select-cbd-review/>.

¹⁸ Steve Garvey, Steve’s Biography (Aug. 4, 2023), <https://web.archive.org/web/20230804010236/https://www.stevegarvey.com/biography.html>.

¹⁹ UCLA Health, Visionary Ball 2023 (June 10, 2024), <https://web.archive.org/web/20240610212655/https://www.uclahealth.org/departments/neurosurgery/about-us/visionary-ball>.

- In 2024, Mr. Garvey was listed as a Member of Major League Baseball’s Baseball Assistance Team.²⁰
- In 2024, Mr. Garvey was listed as the Chairman of the Board of Directors of Fans for the Cure.²¹

II. Legal Background

The Act requires Federal candidates to file annual personal financial disclosure statements.²² The personal financial disclosure statements must include (1) all earned income in excess of \$200 received during the preceding calendar year and current calendar year through the date of filing;²³ (2) all assets and unearned income sources with a fair market value in excess of \$1,000 at the close of the reporting period or from which the filer or their spouse received unearned income in excess of \$200;²⁴ (3) any position held on or before the date of filing during the calendar year of filing, and for individuals reporting for the first time, during the two-year period preceding that calendar year;²⁵ and (4) all personal savings accounts aggregating in excess of \$5,000.²⁶

The U.S. Senate Select Committee on Ethics Instructions (the “*Senate Instructions*”) remind filers of these requirements.²⁷

III. Legal Analysis

Mr. Garvey failed to comply with the requirements imposed by the Act and the Senate Instructions on his personal financial disclosure statement. Mr. Garvey’s actions are not only a potential violation of the Act, but Mr. Garvey’s incomplete disclosure has deprived voters of the information they need to assess whether Mr. Garvey may have financial interests that pose any potential conflict of interest.

- i. *Mr. Garvey failed to disclose any honoraria payments, even though Mr. Garvey received payments for appearances in 2023*

Mr. Garvey answered “No” on Part 1 to the question whether any entity paid him or his spouse more than \$200 for any article, speech, or appearance.²⁸ Yet, news reporting confirmed at least three organizations paying Mr. Garvey for speeches in 2023 – including one appearance where

²⁰ MLB, B.A.T. Board and Operations (June 10, 2024), <https://web.archive.org/web/20240610224842/https://www.mlb.com/baseball-assistance-team/bat-resources>.

²¹ Fans for the Cure, Steve Garvey (June 10, 2024), <https://web.archive.org/web/20240610230927/https://fansfortheure.org/about-us/steve-garvey/>.

²² 5 U.S.C. § 13103(c), (f)(9).

²³ *Id.* § 13104(a)(1).

²⁴ *Id.*

²⁵ *Id.* § 13104(a)(6).

²⁶ *Id.* § 13104(a)(3).

²⁷ U.S. Senate Select Committee on Ethics, Financial Disclosure Instructions and Report for Calendar Year 2023 (Issued March 2024), https://www.ethics.senate.gov/public/_cache/files/270d3e6d-8430-477a-a942-bfb7be7ac219/2023-financial-disclosure-instructions.pdf [hereinafter “2023 Senate Instructions”]

²⁸ 2024 Garvey PFD.

Mr. Garvey was paid \$5,000.²⁹ The Act and Senate Instructions require filers to report the name and addresses of all organizations that paid Mr. Garvey or his wife over \$200 for an appearance.³⁰

Mr. Garvey failed to comply with these explicit requirements.

- ii. *Mr. Garvey failed to report earned income from “Cameo,” in likely violation of the Act*

Mr. Garvey only listed four sources of earned income on Part 2 of his PFD.³¹ Mr. Garvey is required to report the source of all earned income aggregating \$200 or more from any one source.³² Mr. Garvey did not disclose any payments from the website “Cameo,” even though Mr. Garvey’s Cameo profile strongly suggests he received significantly more than \$200 from the website in 2023.³³ Indeed, if only the individuals who left a review paid for a Cameo from Mr. Garvey, Mr. Garvey should have reported \$4,768 in earned income from Cameo.

- iii. *Mr. Garvey claimed he had no reportable positions, even though public reporting suggests Mr. Garvey held numerous reportable positions*

Mr. Garvey claimed that he had no reportable positions.³⁴ The Senate Instructions confirm that Mr. Garvey should have reported all compensated and uncompensated positions from 2022, 2023, through the date of filing.³⁵

But a quick internet search reveals at least five positions Mr. Garvey should have reported, which further questions the accuracy of his PFD. Mr. Garvey failed to report positions with Kadenwood, Inc.,³⁶ Garvey Management Group,³⁷ the UCLA Neurosurgery Board of Advisors,³⁸ Major League Baseball’s Baseball Assistance Team,³⁹ and Fans for the Cure.⁴⁰

²⁹ Alex Schultz, *I Tried to Fact-Check the Resume of this MLB Star Turned Senate Candidate*, SLATE (May 29, 2024), <https://slate.com/news-and-politics/2024/05/steve-garvey-senate-california-schiff-baseball-porter-lee.html>.

³⁰ See 2023 Senate Instructions at 17-18.

³¹ 2024 Garvey PFD.

³² 2023 Senate Instructions at 18.

³³ See Cameo, Steve Garvey (last accessed June 27, 2024), <https://www.cameo.com/stevegarvey6>; Lois Beckett, *Could you win a US Senate primary without really trying? This ageing LA Dodger did it*, THE GUARDIAN (Mar. 7, 2024), <https://www.theguardian.com/us-news/2024/mar/07/steve-garvey-dodgers-baseball-california-us-senate>.

³⁴ 2024 Garvey PFD.

³⁵ 2023 Senate Instructions at 12, 38.

³⁶ Stephanie Watson, *Level Select CBD Oil Review: Tried And Tested*, FORBES (Apr. 30, 2024), <https://www.forbes.com/health/cbd/level-select-cbd-review/>.

³⁷ Steve Garvey, Steve’s Biography (Aug. 4, 2023), <https://web.archive.org/web/20230804010236/https://www.stevegarvey.com/biography.html>.

³⁸ UCLA Health, Visionary Ball 2023 (June 10, 2024), <https://web.archive.org/web/20240610212655/https://www.uclahealth.org/departments/neurosurgery/about-us/visionary-ball>.

³⁹ MLB, B.A.T. Board and Operations (June 10, 2024), <https://web.archive.org/web/20240610224842/https://www.mlb.com/baseball-assistance-team/bat-resources>.

⁴⁰ Fans for the Cure, Steve Garvey (June 10, 2024), <https://web.archive.org/web/20240610230927/https://fansforthecure.org/about-us/steve-garvey/>.

- iv. *Mr. Garvey did not report any assets from his spouse or any bank accounts, raising doubts over the completeness of his disclosure*

Mr. Garvey failed to include any assets owned by his spouse, even though he is required to report all assets with a fair market value exceeding \$1,000 at the close of the reporting period or from which the filer or their spouse received unearned income in excess of \$200 during the reporting period.⁴¹

Mr. Garvey failed to report *any* bank or other personal savings accounts for either himself or his spouse, which is explicitly required by the Act and Senate Instructions, if they hold more than \$5,000.⁴² Mr. Garvey also failed to disclose at least one investment of an indeterminable amount that he does have an interest in, based on public reports.⁴³

Given the other omissions and discrepancies on Mr. Garvey's PFD, an investigation is required for the public to verify whether Mr. Garvey or his wife have omitted additional assets or investment income from his 2024 PFD.

IV. Request for Action

I respectfully request that you commence an immediate investigation into this matter. Prompt action is necessary to ensure that Mr. Garvey complies with federal law and that the public is granted full disclosure of Mr. Garvey's finances as a candidate for the United States Senate.

In accordance with 18 U.S.C. § 1001, I affirm that, to the best of my knowledge and ability, all evidence submitted was not obtained in violation of any law, rule, or regulation.

Sincerely,



End Citizens United
Tiffany Muller
PO Box 66005
Washington, DC 20035

⁴¹ 2023 Senate Instructions at 20.

⁴² *Id.* at 21.

⁴³ See Stephanie Watson, *Level Select CBD Oil Review: Tried And Tested*, FORBES (Apr. 30, 2024), <https://www.forbes.com/health/cbd/level-select-cbd-review/>.