

October 24, 2024

Chairman Paul Vinovich  
Co-Chairman Mike Barnes  
Office of Congressional Ethics  
U.S. House of Representatives  
P.O. Box 895  
Washington, D.C. 20515

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

**Re: Rep. Michelle Steel's Violation of Federal Ethics Law**

Dear Chairman Vinovich and Co-Chairman Barnes:

We write to notify you of a violation of federal law, the Rules of the House of Representatives, and standards of conduct by Representative Michelle Steel. In short, Rep. Steel recently attended an event, seemingly in an “official” capacity, where she engaged in partisan political activities, and she also bragged that she conducts constituent casework services to residents outside of her district on a partisan basis. We respectfully request that the Office of Congressional Ethics investigate this matter.

#### **Background**

Rep. Steel is a Republican Member of Congress who represents California's Forty-Fifth Congressional District. On October 17, 2024, she attended and spoke at a ceremonial street naming event in the City of Huntington Beach, which is located outside of her district in Congressional District Forty-Seven, which is currently represented by Democratic Representative Katie Porter. Rep. Steel delivered a speech to celebrate a street being named after Ed Laird, a local resident who is known for making political donations to Republicans and conservative causes.<sup>1</sup> During her speech, Rep. Steel presented Mr. Laird with what appeared to be an official certificate of Congressional recognition.<sup>2</sup>

Rep. Steel also stated that she would continue to provide congressional casework for residents in the Forty-Seventh District until the Republican candidate running in that district, Scott Baugh, is elected. Specifically, Rep. Steel stated: “I love this District [California's Forty-

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<sup>1</sup> Jill Replogle, “Ed Laird Lane: A major OC political donor gets a street name,” LAist (October 17, 2024), *available at* <https://laist.com/brief/news/politics/ed-laird-lane-huntington-beach>.

<sup>2</sup> Video footage of the event has been posted to the social media site, X. *See* LOLOCGOP (@LOLOCGOP), X (Oct. 19, 2024, 4:08 PM), *at* <https://x.com/LOLOCGOP/status/1847776913487503375>.

Seventh Congressional District]. As much as I love my new district and used to represent here, don't forget that, I still do the work in this district and my new district because you don't have the right congressman here.”<sup>3</sup> She then added, “If you have any problem with the federal government, let me know. I'm still doing your work. And you know what? I'm gonna still do[] the work until Scott Baugh gets elected.”<sup>4</sup>

### **Rep. Steel Has Violated the Prohibition On Mixing Official And Political Activities**

Federal law provides that appropriated funds may only be used for the purpose for which they were appropriated – and they, therefore, cannot be used for partisan political purposes.<sup>5</sup> House rules also prohibit Members from maintaining “unofficial office accounts” – i.e., from using private funds to support official activities.<sup>6</sup> The result is that Members are prohibited Members from mixing official and political activities.

The Committee on Ethics has recognized that certain types of constituent events may, at a Member's option, be conducted either as official or campaign events. However, “[o]nce the Member makes [her] determination [on whether an activity is to be official or political], [s]he is bound by it. A single event cannot, for purposes of the House rules, be treated as both political and official.”<sup>7</sup> When the Member attends an event to conduct official business, the Member is prohibited from using campaign funds (or any other private funds) to advertise or to conduct the meeting.<sup>8</sup> Conversely, if a Member designates an event (or any other activity) as political by using campaign funds for it, no official resources may then be used. “This means that congressional staff should not make arrangements for such an event, invitations to it may not go out under the frank, and the congressional telephone number may not be designated for RSVPs.”<sup>9</sup>

Based on the video footage of the event, it appears as if Rep. Steel was attending the street naming ceremony in an official capacity, as she used the occasion to present a certificate of recognition that seemed to have contained the official Congressional seal. Presumably, the event

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<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> 31 U.S.C. § 1301(a); Committee on Ethics, House Ethics Manual, 135 (Dec. 2022); *see also* Committee on House Administration, Members' Congressional Handbook, 5 (April 30, 2024) (“The MRA may not be used to pay for ... campaign expenses.”)

<sup>6</sup> House R. XXIV, cl.1.

<sup>7</sup> Committee on Standards of Official Conduct, Advisory Opinion No. 6, Acceptance of In-Kind Services for Official Purposes (May 9, 1977), reprinted in House Ethics Manual at 383.

<sup>8</sup> House Ethics Manual at 187.

<sup>9</sup> *Id.* at 187-88.

was therefore also scheduled and staffed by official, taxpayer-funded staff. However, she impermissibly used the occasion to engage in partisan political activities, campaigning for a Republican candidate for a congressional seat that includes Huntington Beach. Even if she was attending the event in an unofficial capacity, she still violated the law and standards of conduct by using official resources (an official certificate bearing the Congressional seal that was presumably printed by House staff using House resources) in connection with the event. Either way, she has violated the law, the Rules and standards of conduct by improperly mixing official and political activities.

**Rep. Steel Has Violated Federal Law By Devoting Her Office Resources To Casework For Individuals Who Live Outside Her District, and on a Partisan Basis**

Members receive a Representational Allowance to support the conduct of official and representational duties to the district from which elected. Federal law requires that the Members' Representational Allowance must "support the conduct of the official and representational duties of a Member of the House of Representatives with respect to the district from which the Member is elected."<sup>10</sup> Therefore, Members cannot devote official resources to casework for individuals outside of their district.<sup>11</sup>

Furthermore, the Committee on Ethics has advised that "[b]ecause a Member's obligations are to all constituents equally, considerations such as political support, party affiliation, or campaign contributions should not affect either the decision of a Member to provide assistance or the quality of help that is given."<sup>12</sup>

Here, Rep. Steel broke both standards. First, by announcing that she conducts casework for residents of California's Forty-Seventh District and promising to continue to do so until a Republican candidate is elected to represent that district, Rep. Steel is expressly violating federal law and misusing federal funds appropriated to her office that is intended to help the residents of California's Forty-Fifth District. Second, by her own admission, her decision to do so is purely partisan – as she indicated, she was performing these services for residents of the Forty-Seventh District because it is currently represented by a Democrat who is "not the right congressman." She indicated that she would continue to do so until Scott Baugh, a

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<sup>10</sup> 2 U.S.C. § 57b (emphasis added).

<sup>11</sup> House Ethics Manual at 317.


<sup>12</sup> *Id.* at 316.

Republican, is elected in the district. Offering or withholding constituent services based on partisan considerations also violates the law, House rules, and standards of conduct.

**Conclusion**

Based on information presented about the October 17, 2024 event, there is more than a reasonable basis to conclude that Rep. Steel violated Federal law and House Rules. We respectfully request that the Office of Congressional Ethics investigate this matter further.

Sincerely,

A handwritten signature in black ink that reads "Tiffany Muller". The signature is written in a cursive style with a large initial "T" and "M".

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