December 8, 2020

The Honorable James Lankford, Chair The Honorable Christopher Coons, Vice Chair Select Committee on Ethics United States Senate Room 220 Senate Hart Office Building Washington, D.C. 20510

Re: Request for Investigation into Senate Candidate Jon Ossoff for Failing to File All Information Required on the Personal Financial Disclosure Form.

Dear Chairman Lankford and Vice Chairman Coons:

Complainant respectfully requests that the Senate Select Committee on Ethics investigate Jon Ossoff, a candidate for the United States Senate for Georgia, for knowingly failing to file all information required to report on the Public Financial Disclosure Report, in violation of Title I of the Ethics in Government Act of 1978, as amended, 5 U.S.C. app. § 104.

Title I of the Ethics in Government Act of 1978 requires candidates for the Senate to file a Senate Public Financial Disclosure Report for each calendar year they continue to be a candidate. The Ethics in Government Act requires that, "[i]t shall be unlawful for any person to knowingly and willfully falsify any information" and "fail to file or report any information that such" candidate "is required to report under section 102."

Further, the Act authorizes the Attorney General of the United States to seek a penalty of up to \$50,000 for knowingly and willfully failing to file information required to be reported on a Financial Disclosure Report.³ Importantly, the Act makes clear that your committee shall refer to the Attorney General "the name of any individual which [your] committee has reason to believe has willfully failed to file or report any information that such individual is required to report."⁴

Ossoff filed a Public Financial Disclosure Report covering the calendar year of 2019 on May 15, 2020. However, on July 10, 2020, Ossoff filed an amendment to the 2020 report. In Parts 10, 15, and 13, Ossoff disclosed that he earned compensation of more than \$5,000 from PCCW Media Limited and Al Jazeera, among a number of other additional companies. PCCW Media Limited has links to the Chinese Communist Party and Al Jazerra has links to terrorist organizations.

¹ Title I of the Ethics in Government Act of 1978, as amended, 5 U.S.C. app. § 101(c).

² Title I of the Ethics in Government Act of 1978, as amended, 5 U.S.C. app. § 104(a)(2)(A).

³ Title I of the Ethics in Government Act of 1978, as amended, 5 U.S.C. app. § 104(a)(1). See also, https://www.ethics.senate.gov/public/index.cfm/overview (Filing Penalties: Non-compliance penalty).

⁴ Title I of the Ethics in Government Act of 1978, as amended, 5 U.S.C. app. § 104(b).

⁵ See https://efdsearch.senate.gov/search/view/annual/456a521a-1b20-4def-b802-5568550059bb/.

⁶ See https://efdsearch.senate.gov/search/view/annual/40de30b2-0ac6-4a5e-8aa0-fba50d4dab0a/.

Select Committee on Ethics December 4, 2020 Page 2

The Georgia Senate Primary was held on June 9, 2020. This was prior to Ossoff filing the amended Public Financial Disclosure Report which showed he earned compensation from controversial companies. Because of this, Georgia voters were not given an accurate assessment of his financial situation. *After* the primary and *after* becoming the Democratic candidate for Senate, he quietly filed an amended Public Financial Disclosure on July 10, 2020.

Georgian voters were left in the dark about the financial interests relevant to Ossoff and they deserved to know whether Ossoff had conflicts of interest or financial entanglements relevant to his candidacy. Ossoff had an advantage over other primary candidates who filed complete disclosures. He willfully and knowingly failed to discuss his ties to controversial companies in order to gain an advantage over his opponents.

Accordingly, the Senate Select Committee on Ethics should investigate Ossoff's willful failure to file the required information on the Public Financial Disclosure. Moreover, your office should investigate whether there is "reason to believe" that Ossoff willfully failed to file the required report, and thus ask the Attorney General of the United States to impose up to \$50,000 in civil penalties.

Sincerely,

COMPLAINANT

Stewart Bragg