



FACT

FOUNDATION FOR
ACCOUNTABILITY
AND CIVIC TRUST

March 1, 2021

Omar Ashmawy
Chief Counsel
Office of Congressional Ethics
U.S. House of Representatives
P.O. Box 895
Washington, DC 20515-0895
Email: oce@mail.house.gov

Re: Ethics Complaint re Rep. Susan Wild (PA)

Dear Mr. Ashmawy,

The Foundation for Accountability and Civic Trust (FACT) is a nonprofit organization dedicated to promoting accountability, ethics, and transparency in government and civic arenas. We achieve this mission by hanging a lantern over public officials who put their own interest over the interests of the public good. We request the Office of Congressional Ethics investigate Representative Susan Wild for violating House ethics rules that forbid Members from using official taxpayer-funded resources for political purposes.¹

The Susan Wild campaign website includes multiple direct links to her official Member website.² For instance, an issue subpage on Wild's campaign website (located at <https://wildforcongress.com/news/us-rep-susan-wild-upcoming-election-covid-19-response-and-movement-police-reform>) links directly to her official website (located at: <https://wild.house.gov/media/press-releases/rep-wild-statement-heroes-act>). There are numerous instances of Wild's campaign linking to the taxpayer funded website as shown in Exhibit A.

House ethics rules require strict separation between campaign and official acts: a Member is prohibited from using official resources for campaign purposes³ and a Member is prohibited

¹ House Ethics Manual, at 123. This ethics rule enforces federal law. 31 U.S.C. sec. 1301(a) ("appropriations shall be applied only to the objects for which the appropriations were made except as otherwise provided by law").

² See Exhibit A.

³ House Ethics Manual, at 123. Additionally, several other ethical considerations also are embodied in the rule, for instance: "The laws and rules referenced in this section reflect 'the basic principle that government funds should not be spent to help incumbents gain reelection.'" House Ethics Manual, at 123 (*citing Common Cause v. Bolger*, 574 F. Supp. 672, 683 (D.D.C. 1982), *aff'd*, 461 U.S. 911 (1983)). A Member's official website and social media accounts are prohibited from including any personal, political, or campaign information, links to campaign-related websites, and "grassroots lobbying or solicit[ing] support for a Member's position." Comm. on House Admin., U.S. House of Reps., Member's Congressional Handbook, at 31.

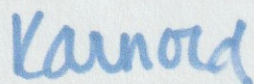
from using campaign funds for official purposes.⁴ With respect to campaign websites, the ethics rules specifically state:

“Member campaign websites . . . may not include a link to the Member’s House website; and The Member’s House website may not be advertised on his or her campaign website or in materials issued by the campaign.”⁵

Wild has committed a clear violation by linking to her official congressional website on her campaign website. As a Member of the House, Wild is required to abide by **all** ethics rules and the House Ethics Manual.⁶ The foundational principal that Members cannot use their official position or resources for private or political gain is embodied throughout and in numerous specific rules.⁷ Moreover, in this case, the ethics rule is very clear and specific: Members are forbidden from using their campaign websites to link to their official taxpayer funded website. It is troubling when our Members cannot even follow the most basic and straightforward ethics rules. The Office of Congressional Ethics is responsible for ensuring each Representative fulfills the public trust inherent to the office and complies with the House’s ethical standards. Therefore, we urge the Board to immediately investigate and stop Representative Wild’s ongoing ethics violations related to her campaign website.

To the best of my knowledge and ability, all evidence submitted was not obtained in violation of any law, rule, or regulation. Further, I am aware that the False Statements Act, 18 U.S.C. § 1001, applies to information submitted to the Office of Congressional Ethics.

Sincerely,



Kendra Arnold
Executive Director, Foundation for Accountability & Civic Trust

⁴ Campaign funds may not be used for official expenses, including “communications” such as official website and official audio and video recordings and materials. House Ethics Manual, at 177-78.

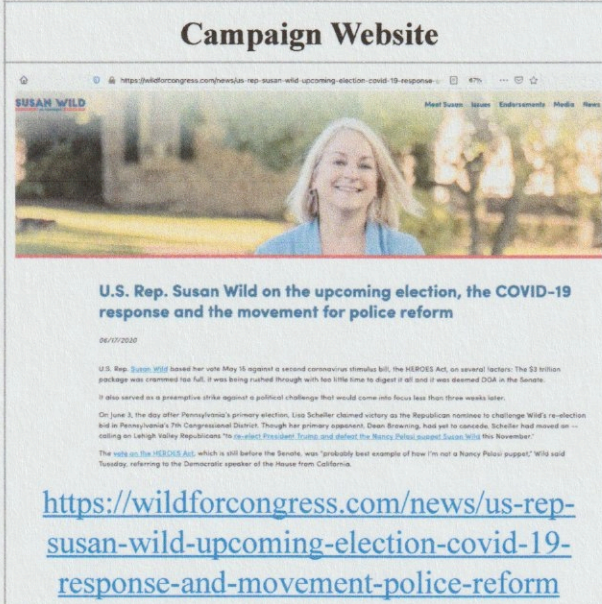
⁵ House Ethics Manual, at 131 (emphasis added).

⁶ The conduct of Members of the House is governed by number of different sources, including criminal law, the Code of Official Conduct, and the Code of Ethics for Government Service, which are incorporated into the House Ethics Manual. House Ethics Manual, Comm. on Standards of Official Conduct, U.S. House or Reps., at 2-4 (2008 ed.), available at https://ethics.house.gov/sites/ethics.house.gov/files/documents/2008_House_Ethics_Manual.pdf. In addition, Members must “conduct themselves at all times in a manner that reflects creditably on the House” and adhere to the spirit as well as the letter of the ethics rules. House Ethics Manual, at 1, 12 (citing House Rule 23, Cl. 1), 16 (citing House Rule 23, Cl. 2), 186.

⁷ See House Ethics Manual, at 1 (Members cannot use their office for private gain), 123-24 (Members cannot use official resources for any campaign for political purpose).

Exhibit A: The campaign website shown on the right column links to the official taxpayer funded website shown on the left column.

Campaign Website



U.S. Rep. Susan Wild on the upcoming election, the COVID-19 response and the movement for police reform

06/17/2020

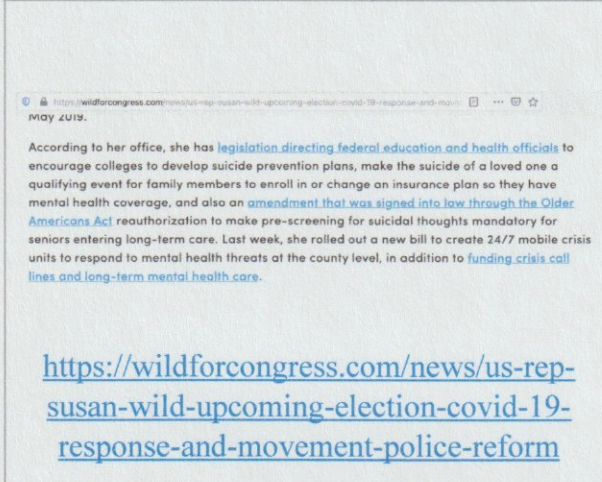
U.S. Rep. Susan Wild issued her vote May 16 against a second coronavirus stimulus bill, the HEROES Act, on several factors: The \$2 trillion package was compressed too fast, it was being rushed through with too little time to digest it all and it was deemed OAA in the Senate.

It also served as a prescriptive strike against a political challenge that would come into focus less than three weeks later.

On June 3, the day after Pennsylvania's primary election, Lou Scheller claimed victory as the Republican nominee to challenge Wild's re-election bid in Pennsylvania's 7th Congressional District. Though her primary opponent, Dean Browning, had yet to concede, Scheller had moved on -- calling on Lehigh Valley Republicans "to re-elect President Trump and defeat the Nancy Pelosi puppet Susan Wild this November."

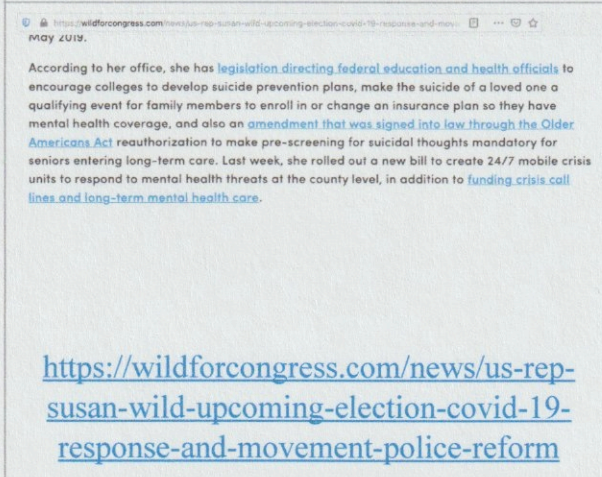
The vote on the HEROES Act, which is still before the Senate, was "probably best example of how I'm not a Nancy Pelosi puppet," Wild said Tuesday, referring to the Democratic speaker of the House from California.

<https://wildforcongress.com/news/us-rep-susan-wild-upcoming-election-covid-19-response-and-movement-police-reform>



According to her office, she has [legislation directing federal education and health officials to encourage colleges to develop suicide prevention plans, make the suicide of a loved one a qualifying event for family members to enroll in or change an insurance plan so they have mental health coverage, and also an amendment that was signed into law through the Older Americans Act reauthorization to make pre-screening for suicidal thoughts mandatory for seniors entering long-term care.](#) Last week, she rolled out a new bill to create 24/7 mobile crisis units to respond to mental health threats at the county level, in addition to [funding crisis call lines and long-term mental health care.](#)

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Official Member Website



REP. WILD STATEMENT ON HEROES ACT

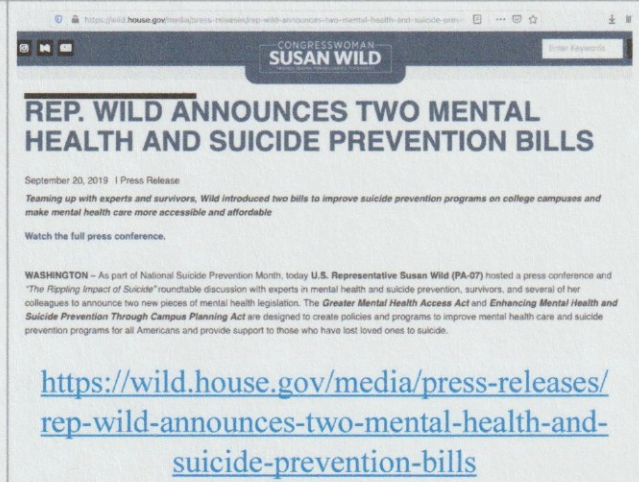
May 16, 2020 | Press Release

WASHINGTON – Today U.S. Representative Susan Wild (PA-07) reissued the following statement regarding the House vote on the *Health and Economic Recovery Omnibus Emergency Solutions (HEROES) Act*.

"From the beginning of this crisis, I have worked with my colleagues—Democrats and Republicans alike—to provide vital funding for hospitals and frontline workers, increase small business loans, and deliver direct economic relief to millions of hardworking Americans. I am proud of the bipartisan support these measures received. The HEROES Act, however, appears to lack that same expansive bipartisan support of past Coronavirus relief packages.

"Moreover, I am concerned about supporting a \$3 billion bill that in my view does not do enough to provide direct and immediate assistance to struggling families and that will almost surely not proceed to a vote in the Senate or to any realistic negotiations with our colleagues across the aisle. And, after consulting with workers and labor leaders across my community, I am alarmed by provisions in this legislation that could result in cuts to pensions and benefits that workers have earned. Now is the time to bring our nation together around solutions that will improve the lives of Americans who are hurting, not engage in partisan gamesmanship, and that's why I will vote against this legislation.

<https://wild.house.gov/media/press-releases/rep-wild-statement-heroes-act>



REP. WILD ANNOUNCES TWO MENTAL HEALTH AND SUICIDE PREVENTION BILLS

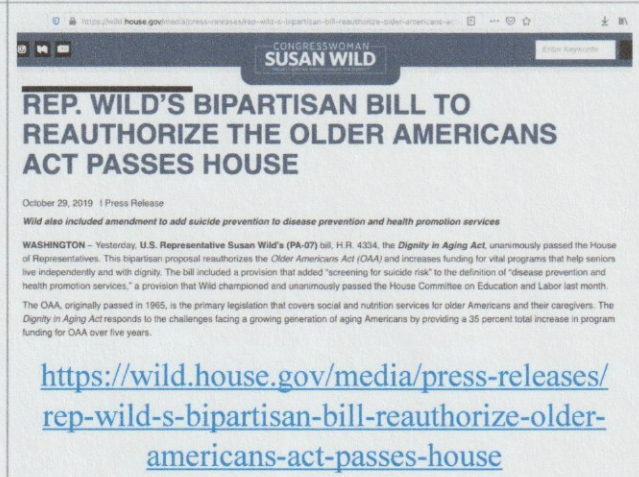
September 20, 2019 | Press Release

Teaming up with experts and survivors, Wild introduced two bills to improve suicide prevention programs on college campuses and make mental health care more accessible and affordable.

Watch the full press conference.

WASHINGTON – As part of National Suicide Prevention Month, today U.S. Representative Susan Wild (PA-07) hosted a press conference and "The Rippling Impact of Suicide" roundtable discussion with experts in mental health and suicide prevention, survivors, and several of her colleagues to announce two new pieces of mental health legislation: The *Greater Mental Health Access Act* and *Enhancing Mental Health and Suicide Prevention Through Campus Planning Act* are designed to create policies and programs to improve mental health care and suicide prevention programs for all Americans and provide support to those who have lost loved ones to suicide.

<https://wild.house.gov/media/press-releases/rep-wild-announces-two-mental-health-and-suicide-prevention-bills>



REP. WILD'S BIPARTISAN BILL TO REAUTHORIZE THE OLDER AMERICANS ACT PASSES HOUSE

October 29, 2019 | Press Release

Wild also included amendment to add suicide prevention to disease prevention and health promotion services

WASHINGTON – Yesterday, U.S. Representative Susan Wild's (PA-07) bill, H.R. 4334, the *Dignity in Aging Act*, unanimously passed the House of Representatives. The bipartisan proposal reauthorizes the Older Americans Act (OAA) and increases funding for vital programs that help seniors live independently and with dignity. The bill included a provision that added "screening for suicide risk" to the definition of "disease prevention and health promotion services," a provision that Wild championed and unanimously passed the House Committee on Education and Labor last month.

The OAA, originally passed in 1965, is the primary legislation that covers social and nutrition services for older Americans and their caregivers. The *Dignity in Aging Act* responds to the challenges facing a growing generation of aging Americans by providing a 35 percent total increase in program funding for OAA over five years.

<https://wild.house.gov/media/press-releases/rep-wild-s-bipartisan-bill-reauthorize-older-americans-act-passes-house>

https://wildforcongress.com/news/us-rep-susan-wild-upcoming-election-covid-19-response-and-mov-
MAY 2019.

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<https://wildforcongress.com/news/us-rep-susan-wild-upcoming-election-covid-19-response-and-movement-police-reform>

Wild has been in Congress since immediately after the 2018 election, when she was sworn-in to finish the term of retired U.S. Rep. Charlie Dent, the moderate Republican who represented Lehigh Valley communities in Pennsylvania's old 15th Congressional District.

Working with the Republican administration, Wild said she has seen successes and frustration. On the positive side, she worked to get [protections against pharmaceutical monopolies included in the United States-Mexico-Canada Trade Agreement](#) hailed by Trump as one of his top achievements. She also had two [bills signed into law through the first coronavirus stimulus bill, the CARES Act](#), both to support seniors -- one regarding meal delivery and one regarding in-home care.

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https://wild.house.gov/media/press-releases/rep-wild-bustos-introduce-legislation-increase-mental-
CONGRESSWOMAN
SUSAN WILD
Enter keywords

REPS. WILD, BUSTOS INTRODUCE LEGISLATION TO INCREASE MENTAL HEALTH CRISIS CARE AT CRITICAL MOMENT

June 11, 2020 | Press Release

Crisis Care Improvement and Suicide Prevention Act of 2020 is endorsed by leading national organizations to help combat the impacts of COVID-19 on adult mental health

WASHINGTON – Yesterday, U.S. Representatives Susan Wild (PA-07) and Cheri Bustos (IL-17) introduced the *Crisis Care Improvement and Suicide Prevention Act of 2020*, legislation that would allow states to upgrade crisis care programs and strategies to meet increased demand in this critical moment. As the COVID-19 pandemic continues to exacerbate existing strains, like the opioid crisis, mental health needs in the United States have reached epidemic levels and have only heightened the need for comprehensive crisis services.

<https://wild.house.gov/media/press-releases/rep-wild-bustos-introduce-legislation-increase-mental-health-crisis-care>

https://wild.house.gov/media/press-releases/rep-wild-bustos-introduce-legislation-increase-mental-health-crisis-care
CONGRESSWOMAN
SUSAN WILD
Enter keywords

REP. WILD STATEMENT ON USMCA AGREEMENT

December 10, 2019 | Press Release

WASHINGTON – Today, U.S. Representative Susan Wild (PA-07) released the following statement after Speaker Nancy Pelosi and House Ways and Means Committee Chairman Richard Neal announced a deal with United States Trade Representative Robert Lighthizer on the United States-Mexico-Canada Trade Agreement:

"When I decided to run for this office, I promised to work across the aisle and represent all my constituents. I heard your calls for bipartisanship, which is why I worked so hard to secure a new North American Trade Agreement that protects our workers, our businesses, and our planet. A new deal requires good faith negotiations, and I am proud that we could put aside our political differences and come to an agreement.

<https://wild.house.gov/media/press-releases/rep-wild-statement-usmca-agreement>

https://wild.house.gov/media/press-releases/rep-wild-applauds-passage-historic-families-workers-first-
CONGRESSWOMAN
SUSAN WILD
Enter keywords

REP. WILD APPLAUDS PASSAGE OF HISTORIC FAMILIES & WORKERS-FIRST CORONAVIRUS LEGISLATION

March 27, 2020 | Press Release

Legislative package includes Wild's bill to combat hunger for older Americans

Watch Wild's full floor speech.

WASHINGTON – Today, U.S. Representative Susan Wild (PA-07) applauded passage of the *Coronavirus Aid, Relief, and Economic Security (CARES) Act*, historic families and workers-first legislation which will now go to the President's desk for signature. Included in this comprehensive response package is the *Combating Hunger for Older Americans During Coronavirus Crisis Act*. Wild's bipartisan legislation to prioritize and improve meal delivery and nutrition services for seniors during the coronavirus outbreak. **This marks the second time in one week that a bipartisan Wild bill is making its way to the President's desk.**

<https://wild.house.gov/media/press-releases/rep-wild-applauds-passage-historic-families-workers-first-coronavirus>