

**American Democracy Legal Fund  
455 Massachusetts Avenue, NW  
Washington, DC 20001**

February 4, 2019

Omar Ashmawy  
Chief Counsel and Staff Director  
Office of Congressional Ethics  
U.S. House of Representatives  
P.O. Box 895  
Washington, D.C. 20515

**Re: Request for Investigation of Representative Ralph Abraham (LA-05)**

Dear Mr. Ashmawy:

I write to request that the Office of Congressional Ethics ("OCE") investigate Representative Ralph Abraham's misuse of his official U.S. House of Representatives webpage for campaign purposes in blatant disregard of the House Ethics Rules.

**Factual Background**

Representative Ralph Abraham is running to be Governor of Louisiana.<sup>1</sup> As a member of the U.S. House of Representatives, Representative Abraham and his congressional office maintain a webpage on the [www.house.gov](http://www.house.gov) web domain.<sup>2</sup> Since Representative Abraham announced his run for Governor on December 6, 2018, his congressional website has posted twenty news articles covering his campaign for Governor, in direct violation of House Ethics Rules.

In Exhibit A (attached), you will find screenshots of and links to each occasion on which Representative Abraham's official government website featured a news article regarding his candidacy for Governor. These screenshots were taken using the Internet Archive: Wayback Machine.<sup>3</sup>

The articles Representative Abraham published on his taxpayer-funded congressional website were highly political. For example, these articles featured headlines such as "Abraham on poll: 'I'm the one who can take (Gov. Edwards) down,'" "Challenging an incumbent governor isn't for the risk-averse," and "Abraham enters governor's race: 'I intend to win.'" At least one of these articles was posted on Representative Abraham's official congressional website for over 25 days. This shameless self-promotion at taxpayers' expense to further a political campaign wholly

<sup>1</sup> See Friends of Dr. Ralph Abraham, Form 200, Statement of Organization (filed Jan. 26, 2019), <http://www.ethics.la.gov/CampaignFinanceSearch/ShowForm.aspx?ReportID=74085>.

<sup>2</sup> See United States Congressman Ralph Abraham, M.D., <https://abraham.house.gov/> (last visited Jan. 30, 2019).

<sup>3</sup> See <https://archive.org/web/> (last visited Jan. 30, 2019).

unrelated to his duties as a U.S. Congressmen is unethical and is a clear and blatant violation of House Ethics Rules.

### Legal Analysis

House rules prohibit the use of official House resources for campaign or political purposes.<sup>4</sup> This prohibition reflects “the basic principle that government funds should not be spent to help incumbents gain reelection.”<sup>5</sup> To that end, the House Ethics Manual explicitly explains that Members’ official websites, which are paid for with taxpayer dollars, “[m]ay not include personal, political, or campaign information.”<sup>6</sup> This prohibition applies to campaigns for any elected office, whether federal, state, or local.<sup>7</sup> And in case that prohibition was not sufficiently clear, the Members’ Congressional Handbook further explains that the content of a Member’s official website “[m]ay not include personal (outside of incidental references), political party (except for political party affiliations), or campaign information.”<sup>8</sup> Here, Representative Abraham posted twenty updates about his campaign for state-level office, thereby violating these rules and misappropriating congressional resources twenty different times.

Furthermore, Members are prohibited from using government equipment and congressional staff time for campaign or political purposes.<sup>9</sup> Upkeep of an official congressional website is a task congressional staff normally perform during the regular course of their work. If congressional staff performed these twenty website updates during the course of their work for Representative Abraham’s congressional office, and on government-provided computers, their actions would be a further violation of these rules.

Given the blatant and repeated nature of Representative Abraham’s actions, I urge OCE to commence an immediate investigation into his conduct. I understand that 18 U.S.C. § 1001 applies to the information I am providing. To the best of my knowledge and ability all evidence submitted was not obtained in violation of any law, rule, or regulation.

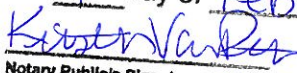
Sincerely,



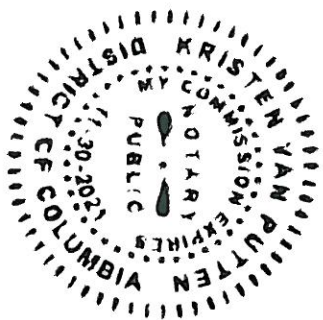
Brad Woodhouse  
(202) 251-5669  
woodhousebrad1@gmail.com

District of Columbia: SS

Sworn to and subscribed before me on  
the 4 day of Feb, 2019



Notary Public's Signature  
My Commission Expires 11-30-2021



<sup>4</sup> H. Comm. on Standards of Official Conduct, House Ethics Manual 121 (2008).  
<sup>5</sup> *Id.* at 123 (citing *Common Cause v. Bolger*, 574 F. Supp. 672, 683 (D.D.C. 1982), *aff'd*, 461 U.S. 911 (1983)).  
<sup>6</sup> *Id.* at 131 (emphasis in original).  
<sup>7</sup> *Id.* at 124.  
<sup>8</sup> H. Comm. Admin., Members’ Congressional Handbook 25 (2018).  
<sup>9</sup> House Ethics Manual 123.