December 04, 2025

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

Re: Request for Investigation into Representative Young Kim

Dear Mr. Ashmawy:

I am writing to request that the Office of Congressional Conduct ("OCC") immediately investigate Representative Young Kim for violating the Ethics in Government Act of 1978 (the "Act") by failing to file complete and accurate financial disclosure statements.¹

As a Member of the House of Representatives, it is *essential* that Rep. Kim report the information required under the Act so that the public is granted full disclosure of her financial interests, including the identity of organizations that pay for Rep. Kim's travel around the world. Without this information, the public is shielded from knowing whether Rep. Kim may have certain conflicts of interest. As demonstrated below, Rep. Kim blatantly omitted reportable information in multiple filings. Specifically, Rep. Kim failed to disclose nearly \$50,000 of privately-sponsored travel on her 2022, 2023, and 2024 personal financial disclosure statements in violation of the Act.

I respectfully request that you immediately investigate this matter.

I. Factual Background

Rep. Kim was first elected to Congress in 2020.² Since 2018 when she first ran for Congress, and every year since, Rep. Kim has filed personal financial disclosure statements ("**PFDs**") which she has certified to be "true, complete, and correct to the best of [her] knowledge and belief." In total, Rep. Kim filed three PFDs as a candidate and five PFDs as a Member.⁴ Additionally, Rep. Kim appears to have made amendments to her candidate reports on multiple occasions.⁵

When Rep. Kim was sworn into Congress in 2021, she was required to complete a comprehensive ethics training from the Committee on Ethics.⁶ She is also required to attend an

¹ 5 U.S.C.A §§ 13101-13111.

² New York Times, "California Election Results: 39th Congressional District," https://www.nytimes.com/interactive/2020/11/03/us/elections/results-california-house-district-39.html.

³ See e.g., U.S. House of Representatives, Young Kim – Financial Disclosure Report (filed Feb. 15, 2018), available at https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2018/10019908.pdf.

⁴ See Financial Disclosure Reports, Clerk of the United States House of Representatives, available at https://disclosures-clerk.house.gov/FinancialDisclosure.

⁵ *Id*.

⁶ House Rule 11, clause 3(a)(6)(B)(i).

annual training from the Committee on Ethics.⁷ House Rules require Members to file a certification by January 31 each year stating they completed the annual training.⁸ Those trainings *include information about Members' financial disclosure obligations*.⁹ Further, the Committee on Ethics publishes detailed guidance each year explaining the reporting requirements in an Instruction Guide.¹⁰ The Committee even offers to review Members' PFDs prior to submission and provides financial disclosure clinics to filers in the leadup to the filing deadline.¹¹

As you know, Members of Congress and their staff are permitted to accept certain travel paid for by private sources when it is connected to their official duties, provided they receive approval from the Committee on Ethics.¹² Rep. Kim has been a frequent acceptor of these trips over the years. Among those trips were:

- A February 2022 trip, for which the American Israel Education Foundation paid over \$25,000 for Rep. Kim and her husband to travel from Los Angeles to Israel.¹³
- A March 2022 trip, for which the Republican MainStreet Partnership paid over \$1,100 for Rep. Kim to travel from Washington, D.C. to San Antonio, Texas.¹⁴
- A December 2023 trip, for which the Gates Global Policy Center paid an estimated \$1,310 for Rep. Kim to travel from Washington, D.C. to Williamsburg, Virginia. 15
- A March 2024 trip, for which The Korea Society and the U.S. Association of Former Members of Congress paid over \$19,000 for Rep. Kim and her husband to travel from Los Angeles to Seoul and Busan, South Korea.¹⁶

⁹ See e.g., Office of Congressional Ethics, OCE Referral Regarding Rep. John Rutherford Exhibits at 37-39, 74-77, 115-117, 191-194, available at

https://conduct.house.gov/sites/evo-subsites/oce.house.gov/files/documents/OCE%20Rev.%20No.%2021-7423%20 Exhibits reduced%20file%20size.pdf.

https://ethics.house.gov/wp-content/uploads/2025/04/2024-Final-Instruction-Guide-4-15-2025.pdf (hereinafter "House Ethics Instruction Guide") (last accessed Sept. 19, 2025).

https://ethics.house.gov/manual/officially-connected-travel-paid-for-by-a-private-source-ethics-committee-travel-regulations/.

⁷ House Rule 11, clause 3(a)(6)(B)(ii).

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¹⁰ U.S. House of Representatives Committee on Ethics, Instruction Guide – Financial Disclosure Statements and Periodic Transaction Reports (2025), available at

¹¹ Committee on Ethics, Memorandum for all Members, Officers, and Employees regarding Upcoming Financial Disclosure Clinics & Training (Apr. 12, 2024), available at https://ethics.house.gov/wp-content/uploads/2024/06/PTRPinksheet_current.pdf.

¹² See Committee on Ethics, Officially-Connected Travel Paid for by a Private Source Ethics Committee Travel Regulations, available at

¹³ Young Kim, Member/Officer Post-Travel Disclosure Form (filed Feb. 28, 2022), available at https://disclosures-clerk.house.gov/gtimages/MT/2022/500024083.pdf.

¹⁴ Young Kim, Member/Officer Post-Travel Disclosure Form (filed March 11, 2022), available at https://disclosures-clerk.house.gov/gtimages/MT/2022/500024084.pdf.

¹⁵ Young Kim, Member/Officer Post-Travel Disclosure Form (filed December 21, 2023), available at https://disclosures-clerk.house.gov/gtimages/MT/2023/500027324.pdf.

¹⁶ Young Kim, Member/Officer Post-Travel Disclosure Form (filed April 22, 2024), available at https://disclosures-clerk.house.gov/gtimages/MT/2024/500028184.pdf.

• An April 2024 trip, for which The Governing Majority Education Fund paid over \$1,700 for Rep. Kim to travel to New York City.¹⁷

In total, these trips appear to be valued at nearly \$50,000. Despite the fact that each of the Committee on Ethics letters approving these trips reminded Rep. Kim to disclose her travel on her PFDs, Rep. Kim reported none of the above five trips on her annual PFDs. 18

II. Legal Background and Analysis

Rep. Kim has committed multiple violations of the Act by failing to disclose at least five privately-sponsored trips, valued at nearly \$50,000, on her PFDs.

The Act requires federal officeholders to file financial disclosure statements that report information about their assets and other financial interests. ¹⁹ This information includes, among other things, travel accepted by the filer that was paid for by private entities or foreign governments. ²⁰ The Act requires filers to disclose travel they accepted that was paid for by private sources or foreign governments if the cost of the travel exceeded the statutory threshold. ²¹ For PFDs filed in 2025 covering calendar year 2024 activity, the statutory threshold was \$480. ²² When disclosing reportable travel, filers are required to list the identity of the trip sponsor; the dates of the trip; the cities of departure, destination, and return; whether the filer was accompanied by a family member; and whether the filer was provided with food and lodging. ²³

Rep. Kim has failed to fulfill these basic requirements. Between 2022 and 2024, Rep. Kim accepted multiple privately-sponsored trips that were valued over the reporting threshold at the time – including the five trips listed above. Yet Rep. Kim did not disclose any of the five trips above on her PFDs. This is particularly egregious given that each of the letters issued by the Committee on Ethics approving her acceptance of the travel specifically reminded her to disclose these trips on her PFDs.

Furthermore, Rep. Kim cannot say she is unaware of this requirement. Rep. Kim properly disclosed that she traveled to Korea on trips sponsored by the Former Members of Congress Association on her PFDs covering calendar years 2021 and 2022.²⁴ Thus, Rep. Kim clearly

¹⁷ Young Kim, Member/Officer Post-Travel Disclosure Form (filed April 10, 2024), available at https://disclosures-clerk.house.gov/gtimages/MT/2024/500028032.pdf.

¹⁸ U.S. House of Representatives, Young Kim – 2022 Financial Disclosure Report (filed May 15, 2023), available at https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2022/10053963.pdf;

U.S. House of Representatives, Young Kim – 2023 Financial Disclosure Report (filed August 6, 2024), available at https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2023/10057252.pdf;

U.S. House of Representatives, Young Kim – 2024 Financial Disclosure Report (filed July 17, 2025), available at https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2024/10067055.pdf.

¹⁹ 5 U.S.C.A. §§ 13103(c), (f); see also House Ethics Instruction Guide at 2.

²⁰ See generally House Ethics Instruction Guide.

²¹ 5 U.S.C.A. § 13104(a)(2)(B).

²² House Ethics Instruction Guide at 67.

²³ House Ethics Instruction Guide at 69.

²⁴ U.S. House of Representatives, Young Kim – 2022 Financial Disclosure Report (filed May 15, 2023), available at https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2022/10053963.pdf;

understands that she is legally required to disclose trips sponsored by private entities—yet still chose not to disclose the five trips listed above.

This blatant omission is a clear violation of federal law and shows a disregard for the Act's important transparency goals that allow the public to know what groups have privately funded Rep. Kim's travel and whether Rep. Kim may have a conflict of interest when voting on matters related to these entities. Further, Rep. Kim's failure to follow these basic rules degrades the public's trust in the institution in which she serves.

III. Request for Action

For all the reasons above, I respectfully request that OCC immediately investigate this matter. Prompt action is necessary to ensure that Rep. Kim complies with federal law and that the public is granted full disclosure of her financial interests. 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,

Tiffany Muller

President, End Citizens United

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U.S. House of Representatives, Young Kim – 2023 Financial Disclosure Report (filed August 6, 2024), available at https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2023/10057252.pdf.