



Senator Tim Scott
Chairman

Jennifer DeCasper
Executive Director

December 1, 2025

The Honorable James Lankford, Chair
The Honorable Christopher Coons, Vice Chair
Senate Select Committee on Ethics
220 Hart Senate Office Building
Washington, DC 20510

Re: Request for Investigation into Senate Candidate Todd Achilles for Failing to File Personal Financial Disclosure Form

Dear Chairman Lankford and Vice Chairman Coons:

Complainant respectfully requests that the Senate Select Committee on Ethics investigate Todd Achilles, a candidate for the United States Senate from Idaho, for failing to file a Personal Financial Disclosure Report within thirty (30) days of becoming a candidate, in violation of Title I of the Ethics in Government Act of 1978, as amended, 5 U.S.C. § 13101 *et seq.*

Title I of the Ethics in Government Act requires that, “[w]ithin 30 days of becoming a candidate . . . for nomination or election to the office of . . . Member of Congress, or on or before May 15 of that calendar year, whichever is later” any candidate for federal office “other than an incumbent . . . Member of Congress shall file a [Financial Disclosure Report].”¹ A “candidate” is defined by statute as an individual who seeks nomination to federal office by making expenditures or receiving contributions exceeding \$5,000.²

The Ethics in Government 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 a Financial Disclosure Report.³ Importantly, the Act makes clear that the Senate Ethics Committee “shall refer to the Attorney General the name of any individual which [your] committee has reasonable cause to believe has willfully failed to file a report[.]”⁴ In addition, the Act imposes a mandatory civil penalty on any candidate who files a report more than 30 days after the statutory deadline.⁵

Achilles filed a Statement of Candidacy with the Federal Election Commission on June 27, 2025.⁶ His principal campaign committee, Todd Achilles for Idaho, filed a Statement of

¹ 5 U.S.C. § 13103(c).

² 52 U.S.C. § 30101(2).

³ 5 U.S.C. § 13106(a)(1).

⁴ *Id.* § 13106(b).

⁵ *Id.* § 13106(d).

⁶ Fed. Election Comm’n, FEC Form 2 Statement of Candidacy (June 27, 2025), <https://docquery.fec.gov/cgi-bin/forms/S6ID00146/1897394/>.



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Organization with the Commission on the same day.⁷ Achilles later publicly announced his Senate campaign in an interview with the Idaho Capital Sun on July 1, 2025.⁸ Therefore, by his own admission and campaign activity, Achilles became a federal candidate no later than June 27, 2025.

The Ethics in Government Act requires that, “[w]ithin 30 days of becoming a candidate,” any “individual other than an incumbent . . . Member of Congress shall file a [Financial Disclosure Report].” In certain circumstances, candidates may request an extension of up to 90 days.⁹ However, extension requests must be submitted on or before the applicable filing deadline.

Accordingly, federal law required Achilles to file a Financial Disclosure Report, or timely request an extension, by July 28, 2025, to provide the public an accurate assessment of his current financial status. As of December 1, 2025, **157 days after** filing a Statement of Candidacy with the Federal Election Commission, Achilles has failed to file any report or request an extension and thus appears to have breached his obligation under the law.

Each day Achilles fails to file his Personal Financial Disclosure Report is another day that Idahoans are left in the dark about the financial interests relevant to Achilles’ campaign. Idahoans deserve to know whether Achilles has conflicts of interest or financial entanglements relevant to his candidacy. By allowing Achilles to shirk his legal obligation and avoid disclosing his financial interests, Achilles has a competitive advantage over other candidates who comply with federal law.

Accordingly, the Senate Select Committee on Ethics should investigate Achilles’ failure to file a Personal Financial Disclosure. If he has indeed failed to file the required disclosure forms within 30 days of declaring his candidacy, then he should be fined and sanctioned appropriately. Moreover, your committee should investigate whether there is “reason to believe” that Achilles 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,

Andrew Pardue
Deputy General Counsel, NRSC
425 2nd Street NE
Washington DC 20002

⁷ Fed. Election Comm’n, FEC Form 1 Statement of Organization (June 27, 2025), <https://docquery.fec.gov/cgi-bin/forms/C00909309/1897395/>.

⁸ Laura Guido, *Idaho Lawmaker Steps Down From Legislature to Run for U.S. Senate Seat as Independent Candidate*, Idaho Capital Sun (July 1, 2025), <https://idahocapitalsun.com/2025/07/01/idaho-lawmaker-steps-down-from-legislature-to-run-for-u-s-senate-seat-as-independent-candidate/>.

⁹ 5 U.S.C. § 13103(g)(1).