



Senator Tim Scott
Chairman

Jennifer DeCasper
Executive Director

February 24, 2026

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 Christy Davis 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 Christy Davis, a candidate for the United States Senate from Kansas, 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

Davis filed a Statement of Candidacy with the Federal Election Commission on August 5, 2025.⁶ Her principal campaign committee, Christy Davis for Kansas 2026, 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 (Aug. 5, 2025), <https://docquery.fec.gov/cgi-bin/forms/S6KS00247/1910289/>.

Organization with the Commission on August 13, 2025.⁷ On August 18, 2025, Davis publicly announced her Senate candidacy in a podcast interview.⁸ Therefore, by her own admission and campaign activity, Davis became a federal candidate no later than August 5, 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].”⁹ In certain circumstances, candidates may request an extension of up to 90 days.¹⁰ However, extension requests must be submitted on or before the applicable filing deadline.

Accordingly, federal law required Davis to file a Financial Disclosure Report, or timely request an extension, by September 4, 2025, to provide the public an accurate assessment of her current financial status. As of February 24, 2026, **203 days after** filing a Statement of Candidacy with the Federal Election Commission, Davis has failed to file any report or request an extension and thus appears to have breached her obligation under the law.

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

Accordingly, the Senate Select Committee on Ethics should investigate Davis’s failure to file a Personal Financial Disclosure. If she has indeed failed to file the required disclosure forms within 30 days of declaring her candidacy, then she should be fined and sanctioned appropriately. Moreover, your committee should investigate whether there is “reason to believe” that Davis 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 (Aug. 13, 2025), <https://docquery.fec.gov/cgi-bin/forms/C00915934/1911050/>.

⁸ Tim Carpenter, *Democratic U.S. Senate Candidate Eager to Broaden Kansas Voice in D.C. Politics*, Kansas Reflector (Aug. 18, 2025), <https://kansasreflector.com/2025/08/18/democratic-u-s-senate-candidate-eager-to-broaden-kansas-voice-in-d-c-politics/>.

⁹ 5 U.S.C. § 13103(c).

¹⁰ *Id.* § 13103(g)(1).