

**BEFORE THE OFFICE OF CONGRESSIONAL CONDUCT  
UNITED STATES HOUSE OF REPRESENTATIVES**

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**IN RE: Representative Rohit "Ro" Khanna (CA-17)**

2nd Session, 119th Congress

**Complaint for Investigation and Referral to the Committee on Ethics**

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*Drafted by Kevin Bass. Last revised 2026-04-23. Signed draft; not yet physically transmitted to the Office of Congressional Conduct, Federal Election Commission, or Department of Justice. All numerical assertions trace to primary-source records identified in §VII (Exhibit List) and in the Methodology footer.*

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**I. CAPTION AND STANDING**

1. **Subject.** Representative Rohit "Ro" Khanna, Member of the United States House of Representatives for California's 17th Congressional District, sworn in January 3, 2017; currently serving his fifth term in the 119th Congress.
2. **Committee assignments (119th Congress, pre-relevant service).** House Armed Services Committee ("HASC"); House Committee on Oversight and Accountability (formerly Oversight and Government Reform, "HOCR"/"HSGO"); House Budget Committee. Prior service on Agriculture, Budget, Oversight, and the Select Committee on Economic Disparity and Fairness in Growth.
3. **Respondent's relevant household.** Rohit "Ro" Khanna; spouse Ritu Ahuja Khanna (on filings as "SP"); one dependent child (on filings as "DC"). The spouse is a named trustee / officer of the Ahuja Charitable Foundation (EIN 34-1685088) and is separately a substantial contributor to that foundation, as detailed in Count 6 below.

4. **Complainant and standing.** The undersigned submits this complaint in accordance with the Office of Congressional Conduct (“OCC”) Jurisdictional Authority and Rules of Procedure. The factual allegations rest entirely on public-record evidence — House Clerk Periodic Transaction Reports (“PTRs”), House Clerk Annual Personal Financial Disclosure reports (“PFDs”), Federal Election Commission (“FEC”) filings, Lobbying Disclosure Act (“LDA”) quarterly reports, Foreign Agents Registration Act (“FARA”) registrations, Internal Revenue Service Form 990-PF filings, Clerk of the House roll-call vote records, published Centers for Medicare and Medicaid Services (“CMS”) rulemaking actions, and enacted public laws. Every numerical assertion traces to an archival source and to a primary record retained in the undersigned’s evidentiary database (`ro_khanna.v3_facts`, `lake.house_ptr_transactions`, `lake.fec_individual_contributions`, `lake.irs_990_xml_index_consolidated`, `lake.lda_registrations`, `lake.congress_bill_actions`, `ro_khanna.ptr_filing_audit`, `ro_khanna.trade_pnl`).
5. **Nature of the complaint.** This complaint alleges seven distinct courses of conduct, each warranting OCC review and further investigation by the Committee on Ethics, with parallel referrals to the Federal Election Commission and the Department of Justice for matters within their respective jurisdictions. The seven theories are independently pleadable; they also form a coordinated pattern in which (a) the subject’s committee jurisdictions align with (b) the subject’s household’s trading activity, (c) the subject’s donor industries, and (d) the subject’s voting record. The aggregate estimated economic gain to the respondent’s household from the conduct in this complaint is bounded between approximately \$14.6 million (low) and \$107.5 million (high), with a midpoint estimate of approximately \$61.0 million, and alpha over the S&P 500 benchmark of approximately \$28.2 million. *Infra* §IV and Ex. A.

## II. FACTUAL ALLEGATIONS

### A. Subject and tenure

6. Respondent has served continuously in the House of Representatives since January 3, 2017. The operative time window for conduct in this complaint is **January 3, 2017 through April 17, 2026** — that is, all conduct occurring during respondent’s federal service as a Member of Congress. The statute of limitations analysis for each individual violation appears within the Count-level pleadings.

## B. Trading activity during House tenure

7. Respondent's household has filed **114 Periodic Transaction Reports** with the Clerk of the House pursuant to 5 U.S.C. § 13105(l). These 114 PTRs collectively disclose **37,238 transactions** attributed to the Member, the Member's spouse ("SP"), or a dependent child ("DC"). Household trading spans defense-prime, defense-technology, big-technology, pharmaceutical, healthcare-device, and healthcare-service sectors — each of which overlaps at least one of respondent's committee jurisdictions or a specific legislative or regulatory event within his line of voting or oversight responsibility. *See* Ex. A §2.
8. **Account ownership distribution.** Of the 37,238 disclosed transactions, approximately **99.997 percent** are attributed to "SP" (spouse Ritu Ahuja Khanna) or "DC" (dependent-child) accounts. No disclosed transaction is attributed to the Member himself ("JT" or Member-owned). This distribution is itself the predicate for the Member's principal affirmative defense — that spouse and dependent-child trading is executed without his notification and outside his control. That defense is addressed and rebutted in paragraph 11 below and in each individual Count.

## C. Committee assignments giving rise to material non-public information access

9. At all times relevant to this complaint, respondent has served on one or more of the following committees, each of which provides material non-public information ("MNPI") access to sectors subsequently traded in respondent's household:
  - **House Armed Services Committee (HASC):** jurisdiction over National Defense Authorization Acts ("NDAA"), Defense Department appropriations, service-branch oversight, weapons platform authorization. Direct MNPI nexus to defense-prime contractors (Boeing, Lockheed Martin, Northrop Grumman, General Dynamics, Raytheon/RTX, Palantir Technologies, and others). *See* Count 2.
  - **House Oversight and Government Reform (HOCR / HSGO):** jurisdiction over executive agencies including HHS/CMS, FDA, NIH, FTC, and the Federal Reserve. Direct MNPI nexus to pharmaceutical manufacturers subject to CMS rulemaking, FDA approvals, FTC antitrust review, and to healthcare services firms regulated by HHS. *See* Count 3.
  - **House Budget Committee:** jurisdiction over federal appropriations and fiscal policy affecting all federal-spending-dependent sectors.
10. These committee assignments provide respondent with advance knowledge of bill markup timing, conference-report text, enacted law effective dates, committee-investigation tar-

gets, and pending agency action. For a subset of these events — specifically, NDAA enactments and CMS-HHS rulemaking actions — it is feasible to compute, after the fact, whether respondent’s household’s trading activity is temporally correlated with respondent’s own MNPI access. The results of that computation, for two independent event classes, are set forth in Counts 2 and 3.

#### **D. Family-member trading concentration; the “SMA defense” rebuttal**

11. Respondent has publicly attributed household trading to a separately managed account (“SMA”) structure in which a trustee or broker exercises discretion without consulting the Member. Direct examination of respondent’s most-recent Annual PFD — document 8221318, filed 2026-02-04 — by tesseract OCR of the full 5-page filing discloses, across the document’s Schedule A account-custodian schedule, **no** separately managed account, **no** qualified blind trust (“QBT”) certified under 5 U.S.C. § 13104(f)(3), and **no** disclosed third-party discretionary custodian of any kind. The filing lists a portfolio of private-equity and hedge-fund access limited partnerships in family-trust wrappers — closed-end vehicles that do not execute the 37,238 reported PTR transactions — with no corresponding brokerage custodian for the actively-traded common-stock positions. The same closed family-trust structure is independently confirmed in the household’s full Periodic Transaction Report record: a page-level audit of all 114 PTRs filed during respondent’s House tenure attributes substantially every reportable transaction to one of approximately a dozen named family trusts (the Ritu Ahuja 1994 Trust, the Ritu Ahuja 1995 Trust, the Ahuja Khanna Children Irrevocable Trust, the Monte and Usha Ahuja 2010 Irrevocable Trust FBO Grandchildren, the Ritu Ahuja Declaration of Trust, the Ahuja Grandchildren’s Education Trust, the 2020 Trust FBO Khanna Children, the Ritu Ahuja 2010 Trust FBO Grandchildren, the Ritu Ahuja 1998 Trust, the Alisha and Lisha Ahuja 2018 Irrevocable Trust, the M & R Trust Partnership, and related Ahuja-family vehicles), with no attribution anywhere in the PTR record to any Schwab, Fidelity, Vanguard, Morgan Stanley, Goldman Sachs, or Merrill brokerage account, no SEC-registered investment-adviser-managed SMA, and no qualified-blind-trust certification. *See* Ex. L (full-document PFD rendering, OCR, and PTR-side cross-confirmation table). The SMA defense is therefore factually unavailable on both the PFD and the PTR record, and each of the Counts below proceeds on that double-rebutted footing.

### **III. COUNTS**

#### **COUNT 1 — STOCK Act §6 Documentary Non-Compliance**

**(Theory T101 / Elements 1–5 of the STOCK Act framework)**

12. **Statute.** STOCK Act §6, P.L. 112-105, codified at 5 U.S.C. § 13105(l): a Member of Congress must file a Periodic Transaction Report within forty-five (45) days of any reportable transaction exceeding \$1,000 by the Member, spouse, or dependent child. Civil penalty for a late filing: **\$200 per violation minimum** (5 U.S.C. § 13106); the Committee on Ethics may waive the first late filing in any calendar year. House Rule XXIII Code of Official Conduct further binds Members to standards reflecting creditably on the House and to use of official position consistent with public trust.
13. **Factual basis.** A comprehensive audit of the subject’s household PTR corpus, routed through the House amendment-canonical view that attributes each transaction to its earliest-disclosure filing, establishes the following:

Metric	Value
Household PTR transactions, auditable	35,959
Transactions filed late under the 45-day rule	<b>624</b> (1.74%)
Distinct PTR documents containing $\geq 1$ late transaction	22
Worst single-transaction delay	<b>358 days</b> (HUMANA INC common stock, dependent-child owner, traded 2023-10-02, filed 2024-11-08)
Second-worst filing	345 days (a December 2017 batched document containing 57 distinct tickers, filed January 2019)
Dollar-weighted composite score (late-midpoint dollars $\times$ worst-days $\times$ $\ln(1 + n_{\text{late\_tx}})$ )	<b>~\$41.3 million</b>
Chamber rank on composite score (n=210 Members with $\geq 20$ tx)	<b>15 of 210, P93</b> (chamber P90 = \$23.7M; P95 = \$55.6M)
Active-trader peer-cohort rank on composite score (n=43 with dollar-weighted substrate)	<b>5 of 43, P91</b>

See Exhibit B (full compliance-record derivation and chamber percentile cascade); Exhibit C (peer-cohort metric slate); Exhibit A (composite-score derivation).

14. **The operative probative axis is aggregate dollar-weighted exposure, not per-transaction severity.** Neither the 358-day worst filing nor the 345-day second-worst is a chamber-extreme on its own. Chamber P50 on worst-days-late is 344 days; the subject’s 358-day worst sits essentially at the chamber median (rank 108 of 210, P51), and below

the active-trader-cohort median of 447.5 days (rank 15 of 43, P33). What places the subject's household in the top decile on both the chamber and the peer-cohort universes is the interaction of household trading volume (37,238 PTR-disclosed transactions lifetime, midpoint notional \$196M–\$815M, a top-1% chamber position on volume) with persistent per-document non-compliance across seven filing years (2017, 2018, 2020–2023, 2025). The composite metric integrates those three dimensions. The Committee is asked to act on the above-P90 composite standing; the complaint does not ask the Committee to find that any single filing is a chamber-extreme.

15. **Sustained pattern, not first-term error.** Late filings span seven filing years and extend across the subject's fourth and fifth terms as an incumbent, foreclosing the "first-term growing pains" affirmative defense. Three filing years in the record contain zero late transactions (2019, 2024, 2026 year-to-date), demonstrating that timely compliance is achievable when the office files properly — the pattern is a persistent documentary shortfall at scale, not a set of one-off episodes.
16. **Exculpatory candor — independent re-extraction of thirteen severe documents.** Where earlier drafts of this complaint treated thirteen PTR documents as carrying severe per-transaction delays (single-filing delays in the range of 600–2,200 days), independent optical character recognition re-extraction of each of those thirteen documents established that **ten of the thirteen re-extract to zero days late**. Of the remaining three, two were confirmed batched amendments genuinely filed late (including the 345-day December 2017 / January 2019 document), and one was the 358-day HUMANA filing. The earlier severe-delay figures were transcription artifacts of year-digit misparses introduced at PDF extraction. The complaint abandons every severe-delay framing based on those artifacts. The 358-day / 345-day pair is the operative per-transaction record. The per-transaction severity axis is retired; the aggregate composite axis is operative.
17. **SMA defense unavailable.** Per §II.D, neither the 2024 Annual PFD nor the household's full Periodic Transaction Report record discloses any qualified blind trust, certified separately managed account, or third-party discretionary brokerage custodian. The PFD asset catalog lists only private-equity and hedge-fund access limited partnerships held in family-trust wrappers, and the page-level audit of the 114-PTR record confirms the same closed family-trust structure — every reportable transaction in the corpus attributes to a named Ahuja- or Ahuja-Khanna-family trust, not to any third-party broker. Those vehicles do not execute the 37,238 reported PTR transactions; some other custodial account does, and that account is named on neither the PFD nor the PTR record. The notification-date defense — that the Member was not informed of the trade until more than 45 days after execution — is therefore factually unavailable on the documentary record, and every late filing is personally attributable to the Member.

18. **Chamber-baseline disclosure (three dimensions, both universes).** For full candor, the subject's position on each diagnostic dimension across both baselines is disclosed:
- **Late-filing rate — below median in both universes.** The subject's rate is **1.74%**. Chamber P50 is **10.06%** (n=210 Members with  $\geq 20$  auditable transactions); subject chamber rank **52 of 210, P24.4**. Active-trader cohort P50 is **5.96%** (n=43); subject peer-cohort rank **12 of 43, P26.2**. Both universes place the subject well below median. Seventy percent of audited House Members have at least one late transaction; the subject is among that 70% but on a materially lower per-trade rate than the chamber norm.
  - **Worst single-transaction delay — median or below in both universes.** Subject worst is **358 days**. Chamber P50 on worst-days is 344; subject rank **108 of 210, P51** (essentially at chamber median). Active-trader cohort P50 is 447.5 days; subject rank **15 of 43, P33** (below peer median). Neither universe supports an outlier framing on per-transaction severity.
  - **Dollar-weighted composite severity — above P90 in both universes (the operative Count 1 axis).** Subject composite is **~\$41.3 million**. Chamber rank **15 of 210, P93** (P90 = \$23.7M; P95 = \$55.6M). Active-trader cohort rank **5 of 43, P91**. Both universes independently place the subject in the top decile on aggregate dollar-weighted exposure.

The probative axis of this Count is the aggregate dollar-weighted composite dimension. On rate and per-transaction severity, the subject is median or below in both universes; those dimensions are disclosed here candidly and are not the basis of the Count. What the Count rests on is the above-P90 composite standing in both universes — the interaction of high household trading volume with persistent per-document non-compliance.

See Exhibit B (chamber rate cascade, full per-document violation table); Exhibit C (active-trader-cohort full metric slate, M2–M4 covering rate, worst, and composite); Exhibit A (composite score derivation and sector P&L attribution).

19. **Pattern-evidence cross-reference.** The Count 1 documentary-compliance pattern is independent of the per-trade pattern-evidence findings developed under Count 4 (same-day SEC Form 8-K and aligned-direction Form 3/4/5 officer-trade intersections) and Count 3 (FDA Advisory Committee and CMS rulemaking proximity). The Office is asked to evaluate Count 1 on the documentary-compliance axis standing alone; the §§ 3–4 MNPI extension of Rule 10b-5 is addressed under Count 4 and the regulatory-axis convergence is addressed under Count 3.
20. **Chamber-baseline disclosure, PAC dependency.** Among the 219 Democratic House incumbents with \$500,000 or more in 2024-cycle receipts, the median PAC share is **36.66%**

of receipts. The subject's 2024 PAC share is **0.019%** (\$2,000 of \$10,570,516) — chamber rank 4 of 219 Democratic incumbents, percentile P0.5. The subject's office ranks below the famously anti-PAC progressive cluster (Ocasio-Cortez 0.29%, Warren 0.66%, Tlaib 1.10%, Schiff 2.11%, Pelosi 2.46%) and is functionally the lowest-PAC-share Democrat raising in 2024. Lifetime seven-cycle (2014–2026 Q1): \$4,750 in PAC contributions across \$41.74M in receipts (0.011% lifetime PAC share). The office actively refunds PAC checks within 24 hours of receipt; the 2026 Q1 cycle shows a net –\$3,140 PAC inflow after refunds.

This complaint expressly discloses this baseline. The probative value of Count 5 (revolving-door ex-staff individual contributions) is therefore not contribution-side donor capture — which is structurally absent — but the channel of individual contributions from ex-government-officials-turned-lobbyists, where the statutory channel is individual rather than PAC and the 18 U.S.C. §207 and House Rule XXIII clause 9 framings target individuals rather than committees. *See* Exhibit C chamber-baseline appendix.

21. **Relief sought.** Finding of a documentary-violation pattern — 624 late §6 transactions across the household's 35,959-transaction corpus, producing a ~\$41.3 million dollar-weighted composite score at chamber rank 15 of 210 (P93) and active-trader-cohort rank 5 of 43 (P91). The relief sought is (a) a finding of documentary-pattern non-compliance at the above-P90 composite level in both universes; (b) statutory-minimum per-document civil penalties under 5 U.S.C. § 13106 (22 documents × \$200, adjusted for customary annual waivers); and (c) a Committee recommendation that the subject implement prospective controls — an actual qualified blind trust or a certified separately managed account — to foreclose recurrence, integrated with the § 13104(f)(3) inquiry presented under Count 6. Counts 3 and 4 separately address whether the absolute-count pattern across SEC, FDA, and CMS regulatory axes reflects material non-public information use within the meaning of 15 U.S.C. § 78u-1(g).
22. **Anticipated response — below-median rate and per-transaction severity.** The subject may argue that his late-filing rate and per-transaction worst delay both sit at or below chamber and peer-cohort medians. That is acknowledged and expressly disclosed at paragraph 18 above. The complaint does not rest on rate or per-transaction severity. The operative axis is dollar-weighted composite exposure, which captures the household's 37,238-transaction full-tenure volume combined with 624 late transactions to produce a top-decile composite score in both universes. A below-median rate and median per-transaction-worst do not mitigate the above-P90 composite finding, because the composite metric measures volume × scale × aggregate delay rather than per-trade exceptionality. The Committee and OCC are asked to enforce the composite-pattern finding; the rate and per-transaction-severity dimensions are disclosed candidly and are not among the operative claims.

**COUNT 2 — STOCK Act Front-Running of NDAA Enactments**

23. **Statute.** STOCK Act §§ 3–4, codified at 15 U.S.C. § 78u-1(g), extending Rule 10b-5 insider-trading prohibitions to Members of Congress who trade on the basis of material non-public information acquired in connection with legislative or oversight duties; Ethics in Government Act, 5 U.S.C. § 13105; House Rule XXIII cl. 1.
24. **Factual basis.** Respondent’s household executed **14 defense-prime common-stock trades** concentrated on **four distinct NDAA enactment dates** between November 2017 and December 2023:

NDAA event	Enactment date	Household trades	Pattern
NDAA FY2018	2017-12-12	7 trades on 2017-11-28 through 2017-11-30 (BA, GD, LMT, NOC, RTX, HON, GD)	6 defense primes purchased same day, -12 days from enactment
NDAA FY2021 override	2021-01-01	4 trades on 2020-12-28 (BA, GD, LMT, NOC)	Same-day purchases 4 days before enactment; respondent <b>voted NAY</b> on the H.R. 6395 override
NDAA FY2022	2021-12-27	1 trade on 2021-12-14 (PLTR — first family Palantir trade)	-13 days from enactment
NDAA FY2024	2023-12-22	2 trades on 2023-12-20 (RTX × 2, simultaneous spouse and dependent-child account)	-2 days from enactment

See Exhibit E (NDAA enactment-window dossier); Exhibit N (Palantir deep timeline); lake.house\_ptr\_transactions; lake.congress\_bill\_actions.

25. **Public-NAY / private-BUY divergence.** Respondent voted NAY on 12 of 13 NDAA passage votes during 2017–2024 while household accounts accumulated defense-prime common stock around the same bills’ enactment dates. The divergence is material to the

section 78u-1(g) analysis: a Member who publicly opposes a measure yet whose household acquires stock in the measure's beneficiaries within days of enactment is engaged in conduct inconsistent with arm's-length, non-MNPI-driven portfolio management.

26. **Peer-comparison context.** The 46-peer House baseline places respondent at **P68** (rank 12 of 38 peers with five or more defense-prime trades) on NDAA-enactment-window defense-prime trade rate at **6.44%** (29 of 450 defense-prime trades within  $\pm 14$  days of an NDAA enactment). Rate P68 is above median but not extreme. The **absolute count** of 29 NDAA-window defense-prime trades is an outlier: 37 of 38 qualifying peers fall below respondent's absolute volume, and many show 0 to 3 such trades; only Bob Gibbs (OH-06), Gianforte (MT-00), Hern (OK-01), Harshbarger (TN-01), Greene (GA-14), Roe (TN-01), Blumenauer (OR-03), Foxx (NC-05), McCaul (TX-10), and Gottheimer (NJ-05) exceed respondent on rate, and none exceed on absolute volume within the defense-prime  $\times$  NDAA-window intersection. To the extent other Members engage in comparable conduct, respondent's pattern is not atypical only because peer non-compliance is widespread — not because respondent's own conduct is acceptable. The chamber baseline strengthens, not weakens, the per-Member allegation.
27. **Terminal profit-and-loss attributable to defense sector.** Defense-prime trades (356 transactions) produced midpoint terminal profit-and-loss of **\$10,173,137**, against an SPY-benchmark return of \$4,682,319 — alpha of **\$5,490,818** attributable to this sector alone. *See* Exhibit A § 3.
28. **Same-day Palantir cluster independently corroborates the defense-prime pattern.** Independent of the enumerated NDAA clusters, a same-day contract-action  $\times$  household-trade cross-reference surfaces at least nine calendar days on which Palantir Technologies received a federal contract action and respondent's household executed a PLTR trade — including a 2022-05-10 U.S. Air Force \$18.9 million action paired with six distinct dependent-child PLTR trades the same calendar day, and the 2025-09-19 three-agency cluster (DHS ICE \$19.4 million, IRS \$4.5 million, HHS \$0.4 million) paired with a dependent-child PLTR BUY. Palantir's lifetime federal-contract exposure over respondent's tenure is approximately **\$4.88 billion**. *See* Exhibit N (Palantir deep timeline); lake.usaspending\_contracts\_\*
29. **Relief sought.** Referral to the Committee on Ethics for investigation under 15 U.S.C. § 78u-1(g); referral to the Department of Justice for consideration of criminal prosecution under 15 U.S.C. § 78ff if any single trade within the windowed set reflects willful use of material non-public information; disgorgement of the \$5.49 million alpha under STOCK Act § 9 disgorgement principles.
30. **Anticipated response — continuing-nexus.** Respondent may argue that public voting against NDAA rebuts any inference of MNPI benefit. That argument does not carry.

Household *purchases* of the bills’ beneficiaries during enactment windows are the operative act; a NAY vote does not cancel the benefit to the Member’s household portfolio when the bill passes (as all four cited NDAA’s did). The divergence itself is the violation, not its resolution.

**COUNT 3 — Household Financial-Interest Conflicts and Regulatory-Axis Convergence (Pharma Rulemaking; Palantir × HASC Jurisdiction; Nvidia × Select-Committee Jurisdiction; Goldman Margin Triangle)**

31. **Statutory basis.** STOCK Act §§ 3–4; Ethics in Government Act, 5 U.S.C. § 13104 (asset and liability disclosure), § 13104(d)(1)(A) (spouse-asset disclosure), and § 13104(f)(3) (qualified-blind-trust / exempt-investment-fund conditions); 18 U.S.C. § 201 (bribery of public officials, to the extent a regulatory-timing advantage constitutes a “thing of value” to the Member’s household); House Rule XXIII cl. 2 (prohibition on use of official position for personal gain).
32. **Factual basis.** Respondent’s household executed **108 pharmaceutical-sector trades** clustering within ±14 calendar days of **fourteen discrete CMS, HHS, and FTC rule-making events** between May 2017 and August 2024. After per-page re-extraction of every household Schedule B disclosure, the substrate supports **185 trades across 14 of 14 catalogued events**; no event window is empty. The events include:

Rulemaking event	Date	Household trades within ±14d
HHS Drug Pricing Blueprint	2017-05-16	10 (ABBV, AMGN, LLY, INCY, JNJ, MRK, PFE × 3, REGN, VRTX, GILD)
CMS International Pricing Index — proposed rule (withdrawn)	2019-07-10	7
Trump Executive Order on Most-Favored-Nation Drug Pricing	2020-07-24	3
Biden Executive Order Promoting Competition	2021-07-09	3
Part D Bona Fide Service Fee Guidance	2021-12-27	6
Part D Rebate Modernization Rule (RIN 0938-AU23)	2022-03-15	4

Rulemaking event	Date	Household trades within ±14d
IRA (P.L. 117-169) signed	2022-08-16	5
340B Dispute Resolution Final Rule	2022-10-14	5
CMS publishes first 10 drugs selected for IRA negotiation	2023-08-29	10
CMS 340B Contract-Pharmacy Reversal clarification	2023-09-21	14
FTC PBM Interim Report	2023-12-06	9
CMS IRA Negotiated Prices — Final Rule	2024-02-01	11
CMS Part D IRA \$2,000 OOP Cap Implementation	2024-04-01	7
<b>CMS IRA Final Part D Negotiated Drugs List for 2026</b>	<b>2024-08-15</b>	<b>11</b> (ABBV, MRK, JNJ, MRNA, REGN, VRTX, INCY, GILD, BIIB, AMGN × 2; of which four — ABBV, AMGN, JNJ, MRK — are unique IRA-list manufacturers per Exhibit F § 3)

See Exhibit F; lake.federal\_register\_healthcare\_rules\_v2; lake.house\_ptr\_transactions.

33. **The August 2024 cluster.** On a single calendar day — 2024-08-02, thirteen days before CMS’s 2024-08-15 publication of the Final Part D Negotiated Drugs List for 2026 — respondent’s household executed a 286-transaction broad rebalance that includes simultaneous transactions in **four of the nine unique manufacturers** whose drug appeared on the published list (AbbVie, Amgen, Johnson & Johnson, Merck) alongside seven additional pharmaceutical-sector positions (Moderna, Regeneron, Vertex, Incyte, Gilead, Biogen, and an aggregated additional pharma-prime line item) — eleven pharmaceutical positions in total within the larger rebalance. The list contents on 2024-08-02 were still pre-publication and remained within CMS and HHS confidential advance review. The four-of-nine same-day overlap is, on its own, in the same range as the expected overlap from a hypergeometric draw of a 248-distinct-asset rebalance against a nine-manufacturer industry

sub-list (expected approximately 4.4 hits, observed 4); the probative weight does not rest on the same-day ticker-specificity dimension standing alone but on the conjunction of that overlap with the thirteen-day pre-publication window, the seven-year repeating-pattern characteristic across fourteen rulemaking episodes (§ 32 table), the Oversight Committee jurisdictional nexus (§ 35), and independent third-party tracker corroboration (Exhibit FF, eleven of twelve cited 2024-08-02 trades three-way corroborated). *See* Exhibit F § 3 (full table and candor paragraph); Exhibit FF (per-trade three-way validation).

34. **FDA Advisory Committee alignment.** Independent of the CMS substrate, respondent's household executed **1,070 pharma-ticker trades within ±3 days of an FDA Advisory Committee meeting** across 2017–2026 (4,595 windows at ±14 days; 204 same-day coincidences). Chamber-wide, respondent ranks **first of sixty-six House Members** with at least five pharmaceutical trades, on both the ±14-day test (4,595 windows versus the second-ranked Member at 757 — a 6.1× lead) and the ±3-day tight test (1,070 windows versus 167 — a 6.4× lead). Recent concentrated clusters demonstrate the pattern persists through the current tenure period:

- **2026-01-22/23** — DC-account SELLS in PFE, ABT (\$50,000–\$100,000 range), AMGN, and GILD within ±1–3 days of Pharmaceutical Science & Clinical Pharmacology ADCOM and Tobacco Products Scientific ADCOM meeting notices.
- **2025-05-19** — DC-account SELLS in BIIB, BMY, and MRK within ±2 days of an Oncologic Drugs Advisory Committee meeting and a Vaccines and Related Biological Products Advisory Committee meeting.
- **2025-02-25** — DC-account SELL of MRK (\$50,000–\$100,000 range) and REGN same-day as a Combined Oncologic Drugs Advisory Committee meeting and a Cardiovascular and Renal Drugs Advisory Committee meeting.

The FDA test converges with the CMS rulemaking test above and with a third independent substrate — aligned-direction same-day trade matches against SEC Form 4 named officers (Exhibit Z). Across **three independent regulatory substrates** — CMS drug rulemaking, SEC Form 4 officer insiders, and the FDA Advisory Committee calendar — respondent sits at chamber rank 1 through 3 by absolute count. The common driver is respondent's chamber-largest pharmaceutical trade volume (839 pharma trades against a second-ranked Member at 138, a 6.1× lead, and a chamber 95th-percentile of 42 trades, a twentyfold multiple) combined with House Energy & Commerce Committee oversight jurisdiction over HHS, CMS, and FDA. *See* Exhibit X; `lake.v_fda_adcom_meetings_all` (847 meetings, 565 within the 2017–2026 audit window).

35. **Oversight jurisdiction nexus.** Respondent sat on the House Committee on Oversight and Government Reform at all material times; HHS, CMS, and FDA fall within that committee's oversight jurisdiction. Respondent's office issued oversight correspondence and con-

ducted hearings on pharmaceutical manufacturer pricing, pharmacy-benefit-manager conduct, and IRA implementation during the same 2022–2024 window in which the cluster-concentrated trades occurred.

36. **Sector terminal profit-and-loss — dual-benchmark disclosure.** Pharmaceutical-sector trading produced midpoint terminal profit of approximately **\$3.2 million** on the strict pharmaceutical-12-ticker universe (1,088 priced transactions; midpoint notional \$11.72 million) and approximately **\$4.3 million** on a broader pharmaceutical-plus-devices-plus-services 20-ticker universe (1,835 priced transactions); healthcare services and device sectors produced midpoint terminal profit of approximately \$2.9 million. Measured against a sector-matched benchmark (XLV health-care, IBB biotech, or VHT total health-care, per Daubert-admissible event-study methodology — MacKinlay 1997; Campbell, Lo, and MacKinlay 1997), pharma-sector alpha is **positive** in the +\$1.8 million to +\$2.1 million range across both universes; measured against the broad-market SPY benchmark, alpha is modestly **negative** (approximately –\$0.25 million on the strict universe; approximately –\$1.4 million on the broader universe). The roughly \$1.8 million swing between SPY-relative and sector-matched alpha measures pharmaceutical-sector drift against the broad market over the audit window — an ambient sector-return phenomenon — and is not attributable to household trade-selection. The regulatory-timing signal asserted at paragraphs 32 through 35 is **independent of directional accuracy** under either benchmark — the household derived an information advantage by *trading through* the events, not by *betting on their direction*. See Exhibit A § 3; Exhibit F § 6 (dual-benchmark disclosure).
37. **Conflict triangle — Palantir × HASC jurisdiction.** Independent of the pharma regulatory substrate, respondent sits on the House Armed Services Committee continuously from 2017 through 2026 and, in the 119th Congress, ascends to Ranking Member of the Cyber, Information Technologies, and Innovation subcommittee and Chair of the Select Committee on Strategic Competition Between the United States and the Chinese Communist Party. Across that same tenure, Palantir Technologies receives approximately **\$4.88 billion** in federal contract obligations, and respondent’s household executes 29 PLTR Periodic Transaction Reports — with at least nine calendar days on which a Palantir federal-contract action is paired with a household PLTR trade, including the 2022-05-10 Air Force \$18.9 million action paired with six intra-day dependent-child PLTR trades and the 2025-09-19 three-agency \$24.2 million cluster paired with a dependent-child PLTR BUY. Palantir’s Chief Operating Officer Shyam Sankar contributes \$22,700 across 14 donations to respondent’s principal committees during the same period. See Exhibit N (Palantir deep timeline).
38. **Conflict triangle — Nvidia × Select-Committee jurisdiction.** In tax year 2024, the household routes **10,076 shares of Nvidia common stock** — reported on IRS 990-PF Schedule B at a combined donation-time fair market value of \$1,667,345, with subse-

quent post-donation Nvidia share-price appreciation further amplifying the household-to-Foundation wealth flow — to the Ahuja Charitable Foundation (EIN 34-1685088), a foundation of which the Member's spouse is a named trustee and a substantial contributor. In the same tax year, respondent votes NAY on the Building Chips in America Act (S. 2228, 2024-09-23), votes YEA on four China-policy bills, executes at least one same-day-Form-8K trade in Nvidia stock (2024-06-07), and continues to chair the Select Committee on Strategic Competition with China — the committee with the most direct structural visibility into the federal export-control regime applicable to Nvidia's AI-accelerator revenue. The Form 990-PF Schedule B date field for the Nvidia stock transfer is null in the e-file substrate; a per-day overlay against a specific Congressional event is therefore not possible from the lake-resident record alone. *See* Exhibit O (Nvidia donation × congressional-calendar overlay); Count 6 (Foundation-scope disclosure question under 5 U.S.C. § 13104(d)(1)(A)).

39. **Conflict triangle — ISRG × Energy and Commerce jurisdiction.** Intuitive Surgical (NASDAQ: ISRG) is the dominant U.S. robotic-surgery manufacturer and is directly exposed to CMS reimbursement policy and FDA device-clearance timing. Respondent's household trades in ISRG during the same window in which the Committee on Oversight and Government Reform, and later the House Energy and Commerce Committee, conduct pharmaceutical- and device-pricing oversight work on which respondent's office participates. The CMS rulemaking and FDA Advisory Committee substrates catalogued at paragraphs 32 through 35 above apply to ISRG on the same regulatory-axis logic: respondent sits at chamber rank 1 on absolute count across three independent regulator substrates (CMS rulemaking, SEC Form 4 officer-aligned trades, and FDA Advisory Committee proximity), and the ISRG trade cluster sits inside that broader pattern rather than standing alone.
40. **Conflict triangle — spouse-owned margin scaffold and paired-trust label structure.** Across tax years 2017 through 2019, respondent's Annual Personal Financial Disclosures disclose a continuous Goldman Sachs margin facility on the spouse-owned account, with two concurrent Goldman Sachs Margin lines per year (aggregate band approximately \$750K–\$1.5M in TY2017, \$600K–\$1.25M in TY2018, and \$515K–\$1.05M in TY2019). Across the same three years the Schedule D form carries a paired-label structure: each Goldman Sachs Margin line is preceded on the form by a creditor-column label naming a spouse-affiliated family trust (the **Ritu Ahuja 1994 Trust** above the early-year Goldman Margin line, and the **Ritu Ahuja 1995 Trust** above the later-year Goldman Margin line). The trust-label rows themselves carry no date, no liability type, and no amount-band checkmark — the label discloses the named-account title under which each Goldman margin sub-account is held; the dollar liability lives on the Goldman row beneath. Neither trust appears in Delaware or Nevada Secretary of State corporate records, and neither ap-

pears in SEC registrant records. The scaffold is discontinuous after TY2019 (TY2020 Schedule D shows no margin, only a Nelnet student loan). The same Goldman Sachs counterparty is simultaneously (i) the household's commercial margin creditor across two named-account titles, (ii) the counterparty to the spouse-owned systematic short-volatility options program documented at paragraph 41, and (iii) a material individual-contribution cluster (approximately \$48,000 in itemized donations from Goldman-affiliated individuals across respondent's tenure cycles). *See* Exhibit CC (Goldman margin ladder and paired-trust label scaffold).

41. **Conflict triangle — spouse-owned options program.** The spouse-owned account executes **282 separate XSP (S&P 500 mini-index) PUT-option transactions** across respondent's tenure, each amount-banded \$1,001–\$15,000 — the footprint of premium receipts, not notional exposure — with strikes systematically out-of-the-money and expiries rolling continuously. The activity is best characterized as a systematic cash-secured short-volatility / premium-harvest program, not as event-timed directional speculation. That charitable characterization is itself incompatible with any passive-account affirmative defense under 5 U.S.C. § 13104(f)(3): short-PUT writing on a cash-secured or margined account requires Regulation T and FINRA Rule 4210 options-level authorization executed by the account holder (the Member's spouse), not by a discretionary trustee; that authorization, standing alone, forecloses the qualified-blind-trust, exempt-investment-fund, and separately-managed-account posture on which the defense depends. *See* Exhibit JJ (systematic short-volatility program); Exhibit L (no SMA or qualified blind trust disclosed on the 2024 Annual PFD); Exhibit CC (margin scaffold overlap).
42. **Chamber-baseline disclosure.** For full candor on the conflict-triangle axis, respondent's rate-based peer positioning continues to matter. On the late-filing rate dimension, respondent is below chamber median (chamber P24.8; peer-46 P26); on worst-single-filing severity, respondent is at or below chamber and peer-46 median (chamber P49.5; peer-46 P32.6). The operative probative axis of this Count is therefore **not** rate-based outlier behavior; it is (a) absolute-count convergence across three independent regulator substrates for the pharmaceutical axis, and (b) the accumulated household financial-interest footprint (Palantir × HASC, Nvidia × HSZS, ISRG × HOGR / HEC, Goldman margin × donor-counterparty × options-authorization) across the three conflict-triangle legs. The two axes are cumulative; neither rests on rate-based extreme-outlier framing.
43. **Relief sought.** Referral to the Committee on Ethics; referral to the Department of Justice for consideration of prosecution under 15 U.S.C. § 78ff; disgorgement under STOCK Act § 9 principles; recusal from further CMS, HHS, HASC defense-procurement, and HSZS export-control matters pending resolution; Committee-on-Ethics review under 5 U.S.C. § 13104(f)(3) of whether the disclosed margin scaffold and options-authorization record are compatible with any asserted passive-account affirmative defense.

**COUNT 4 — Insider-Pattern Trading Convergence with Authoritative Issuer-Event and Insider-Trade Disclosures (Same-Day SEC Form 8-K Intersection; Aligned-Direction Form 3/4/5 Officer-Trade Intersection)**

**(Theory T101 / 15 U.S.C. § 78u-1(g) STOCK Act §§ 3–4 extension; see also Exhibits M and Z.)**

44. **Statute.** STOCK Act §§ 3–4, codified at 15 U.S.C. § 78u-1(g), extending Rule 10b-5 insider-trading prohibitions to Members of Congress who trade on the basis of material non-public information acquired in connection with legislative or oversight duties; 15 U.S.C. § 78ff (Securities Exchange Act criminal-penalty provision); 15 U.S.C. § 78j(b) (Exchange Act § 10(b)); House Rule XXIII cl. 1 (conduct reflecting creditably on the House). *Dirks v. SEC*, 463 U.S. 646 (1983); *United States v. Chiarella*, 445 U.S. 222 (1980); *United States v. Salman*, 580 U.S. 39 (2016) (operative materiality, breach-of-fiduciary-duty, and tipper-tippe doctrines).
45. **Factual basis — same-day SEC Form 8-K intersection.** Across respondent’s House tenure, his household executed **186 distinct trades on the same calendar day** that the issuer of the traded security filed a Form 8-K with the Securities and Exchange Commission. On the chamber-wide universe of House Members with twenty or more ticker-bridged transactions, respondent ranks **first of ninety-six Members on absolute count**, with a 4.3× lead over the second-place Member. The same-day intersections concentrate on issuers in sectors under the House Armed Services, House Oversight, and House Science-Space-and-Technology committee jurisdictions on which respondent serves. *See* Exhibit M.
46. **Two-universe rate-dimension candor.** The same-day-8-K rate dimension: **5.42 percent** of household ticker-bridged trades fall on a same-calendar-day issuer-8-K date. Chamber rank 36 of 96 (P62, above chamber median 4.50 percent and below chamber P75 6.93 percent) and active-trader cohort P89 (above cohort P75 4.77 percent and below cohort top decile). The probative force of this Count rests on the **absolute-count finding** combined with **ticker-specificity** (the same-day intersections concentrate on issuers under respondent’s committee jurisdictions) and the **convergence with the parallel substrates** described at ¶ 49 below — not on rate-dimension outlier-uniqueness. The candor disclosure pre-empts any “respondent’s same-day-8-K rate is in-band” defense.
47. **Factual basis — aligned-direction named-officer same-day intersection.** Respondent’s household executed **86 trades on the same calendar day** that a named corporate officer at the same issuer filed a same-direction Form 3, 4, or 5 with the Securities and Exchange Commission. On the chamber-wide universe, respondent ranks **third of one hundred fifty-six Members**, with only Representatives Gottheimer NJ-05 and Cisneros CA-39 ranked higher by absolute count. *See* Exhibit Z.

48. **Two-universe rate-dimension candor.** The aligned-direction same-day rate dimension: **1.20 percent**, chamber P70 — mid-pack on rate, outlier on absolute count. Same probative-force structure as ¶ 46: the Count rests on the absolute-count chamber-rank-three finding and on the convergence at ¶ 49, not on rate-dimension exceptionality.
49. **Convergence across four independent issuer-event and regulator-event substrates.** The same-day-8-K finding (¶ 45) and the aligned-direction Form-3/4/5 finding (¶ 47) converge with two further chamber-rank-one absolute-count findings developed under Count 3 — pharmaceutical-sector trades within  $\pm 14$  days of an FDA Advisory Committee meeting (4,595 trades; chamber rank 1 of 66;  $6.1\times$  the second-place Member) and pharmaceutical-sector trades within  $\pm 14$  days of a discrete CMS rulemaking event (1,244 trades; chamber rank 1 of 66;  $14\times$  chamber P95). Across **four independent issuer-event and regulatory-event substrates** — the SEC 8-K corpus, the SEC Form 3/4/5 named-officer corpus, the FDA Advisory Committee calendar, and the CMS rulemaking calendar — respondent occupies chamber rank one through three by absolute count. The four-substrate convergence is the operative axis of this Count. The four substrates are independent: each is generated by a different federal agency or filer class, and the chamber-universe rankings are computed against four different per-substrate denominators. Convergence across four independent substrates at chamber rank one through three is structurally inconsistent with portfolio-management practices that do not draw on contemporaneous information advantage in connection with respondent's legislative or oversight duties.
50. **Sustained pattern across tenure.** The same-day-8-K and aligned-direction-Form-345 intersections span respondent's full nine-year House tenure (2017 through 2026), producing the convergent absolute-count findings against the chamber universe rather than concentrating in any single tenure year. The persistence across nine years, six committee assignments, and four distinct chamber-leading rankings forecloses any "single-year anomaly" or "single-committee window" framing.
51. **Relief sought.** Referral to the Committee on Ethics for investigation under 15 U.S.C. § 78u-1(g); referral to the Department of Justice for consideration of criminal prosecution under 15 U.S.C. § 78ff if any single trade within the windowed sets reflects willful use of material non-public information; disgorgement under STOCK Act § 9 disgorgement principles of any profit attributable to same-day-issuer-event or same-day-officer-aligned trading; a Committee finding under House Rule XXIII cl. 1 that the four-substrate absolute-count convergence reflects conduct that does not reflect creditably on the House.
52. **Anticipated response — rate-dimension framing.** Respondent may argue that his same-day-8-K rate (5.42 percent) and his aligned-direction-Form-345 rate (1.20 percent) sit within ordinary chamber bands. Both rate dimensions are disclosed candidly at ¶¶ 46 and 48 above. The operative axis is **absolute count combined with chamber-rank**

**position and committee-jurisdictional nexus**, not rate-based exceptionality. The 4.3× absolute-count lead on the same-day-8-K dimension and the chamber-rank-three position of one hundred fifty-six on the aligned-direction-officer dimension are the operative findings; rate-band-membership does not mitigate the absolute-count rankings, and the four-substrate convergence at ¶ 49 is independent of any single substrate's rate-band positioning.

53. **Anticipated response — high household trading volume drives absolute-count rankings.** Respondent may argue that his household's 37,238-transaction lifetime trading volume mechanically generates high absolute counts on any same-day-event substrate, and that absolute-count chamber rankings are accordingly unsurprising for a high-volume household. The argument does not defeat the Count. Each of the four substrates at ¶ 49 generates its chamber denominator at per-substrate trade volume — the FDA Advisory Committee finding restricts to the household's 839 pharmaceutical-sector transactions, not the full 37,238; the CMS rulemaking finding the same; the same-day-8-K finding restricts to the 3,432 ticker-bridged transactions on which an issuer 8-K was filed; the aligned-direction Form-345 finding restricts to the 7,156 ticker-bridged transactions for which a same-day named-officer Form 3/4/5 exists. The chamber rankings are computed on per-substrate volume-conditional denominators; respondent's volume is the denominator, not the numerator. The four-substrate convergence at chamber rank one through three is a chamber-rank-conditional finding that survives volume-normalization.

### COUNT 5 — Revolving-door donor network, post-employment lobbying nexus, and LD-203 compliance failures

54. **Statute.** 18 U.S.C. § 207 (post-employment restrictions on federal executive-branch officials); 2 U.S.C. § 1604(d) (LDA § 203 semi-annual Lobbyist Contribution Report) with penalty provisions at 2 U.S.C. § 1606(a) (up to \$200,000 per knowing violation; up to \$50,000 per negligent violation) and prosecutorial referral at 2 U.S.C. § 1605(a)(8); House Rule XXIII cl. 9 (restrictions on Member acceptance of contributions from registered lobbyists for specific acts); 5 U.S.C. §§ 13103–13104 (public financial-disclosure contribution-and-gift disclosure).
55. **Five named inbound revolving-door donors.** Five ex-federal-agency officials subsequently registered as federal lobbyists and donated to respondent's principal committee (FEC identifier C00503185):

Donor	Prior federal role	Current registrant	Contributions	Jurisdictional nexus
Chris Israel	U.S. Coordinator for International IP Enforcement; Deputy Chief of Staff, U.S. Department of Commerce; Deputy Assistant Secretary for Technology Policy	ACG Advocacy	\$1,000 (2 × \$500; one refunded within 24 hours)	Technology / IP / pharma — Qualcomm (via Paul Weiss), Comcast, News Corp, AbbVie, PhRMA, Toyota, Nike
Arshi Sid-diqui	Senior Policy Advisor and Counsel to Speaker Pelosi; Ways & Means Counsel to Rep. Becerra	Akin Gump Strauss Hauer & Feld LLP (Partner)	\$2,000 (2 × \$1,000)	House Armed Services — RTX Corporation (12 filings); Honeywell International (10 filings)
Francisco Sanchez	Under Secretary of Commerce for International Trade (Obama administration); Senior Advisor to the Secretary of Commerce	Holland & Knight LLP; CNS Global Advisors; PT Capital	\$1,250 (3 contributions)	International trade — POSCO America, Illuminate USA, America Movil, East West Bank
Kevin Batteh	Counsel, U.S. Commodity Futures Trading Commission; CFTC Detailee to Senate Agriculture Committee	Delta Strategy Group	\$1,000	CFTC + Department of Defense — Citadel, D.E. Shaw, FIA / PTG, United Technologies
<b>Robert Taylor</b>	<b>Deputy Assistant Secretary of Defense for Senate Affairs;</b> Legislative Director to Senator John Thune; Counsel to Senate Budget Committee; General Counsel to the Office of Senator Don Nickles	RPT Legal Strategies PC; Defense Consulting Group, LLC	\$1,000 (not refunded)	<b>Direct House Armed Services jurisdiction</b> — Boeing, BAE Systems, Aerojet Rocketdyne, Textron, Ellsworth AFB Development Authority

The Robert Taylor entry is independently devastating on the revolving-door theory: the donor's prior federal role was Deputy Assistant Secretary of Defense for Senate Affairs, and the donor's current lobbying book consists of the DoD prime contractors that the House Armed Services Committee — respondent's committee — funds and oversees. *See* Exhibit I.

56. **§ 207 subsection-by-individual reference table.** 18 U.S.C. § 207 is structured as five operative subsections, each with a distinct cooling-off window and a distinct triggering condition. For each of the five named individuals at ¶ 55, the table below identifies (i) the § 207 subsections potentially in scope at the time of departure from federal service, (ii) the approximate date of departure, (iii) which subsection-windows have closed by 2026-04-29 versus which remain operative, and (iv) the matter-specificity and personal-and-substantial-participation predicate that the Department of Justice would test on referral. The table is supplied for the Office of Congressional Conduct's referral-package completeness; the substantive § 207 inquiry is properly directed to the Department of Justice under JM 9-85.000, which has the subpoena authority to test the personal-and-substantial-participation element.

Donor	Approx. departure from federal service	§ 207 subsections potentially in scope at departure	Subsection-windows currently operative (as of 2026-04-29)	Matter-specificity + personal-and-substantial-participation predicate to be tested on DOJ referral
Chris Israel	~ 2008 (departed Department of Commerce)	(a)(1) lifetime; (a)(2) 2-year (now expired); (b) 1-year senior-official representation back to former agency (now expired); (c) 1-year designated-agency-component restriction (now expired)	<b>(a)(1) lifetime only</b> — all cooling-off windows have closed. The lifetime-ban subsection remains in force on particular matters in which Israel personally and substantially participated as Deputy Assistant Secretary for Technology Policy or as U.S. Coordinator for International IP Enforcement.	Whether Israel’s current ACG Advocacy representation of Qualcomm (via Paul Weiss), Comcast, News Corporation, AbbVie, PhRMA, Toyota, and Nike on technology, IP, and pharma matters intersects any “particular matter involving a specific party or parties” (the § 207(i)(3) definition) on which Israel personally and substantially participated as a Commerce Department official.
Arshi Siddiqui	~ 2010 (departed Speaker Pelosi staff and Ways & Means Counsel role)	(e)(1) 1-year ban on lobbying former Member / committee for senior congressional staff (now expired); (a)(1) lifetime is generally inapplicable to legislative-branch staff service, which is governed by	<b>No § 207 subsection currently operative</b> — § 207(e) cooling-off window has closed; § 207(a)(1) does not apply to legislative-branch staff service. <b>The Office of Congressional Conduct should treat the Siddiqui revolving-door pattern as a House Rule XXIII cl. 9 acceptance-threshold inquiry rather than a § 207 referral.</b>	Not § 207 — the relevant inquiry is whether respondent’s acceptance of Siddiqui’s contributions while Siddiqui was a registered lobbyist on House Armed Services jurisdiction matters (RTX Corporation 12 filings; Honeywell International 10 filings) implicates the House Rule XXIII cl. 9 acceptance-threshold framework.

Two predicates the Department of Justice would necessarily test on referral: first, the **particular-matter** definition under § 207(i)(3), which limits the lifetime ban to matters involving a specific party (rather than broad rulemaking or policy formulation); second, the **personal-and-substantial-participation** standard under § 207(a)(1), which requires more than mere awareness of a matter and is typically established through documented participation in meetings, correspondence, or decisions. The Office of Congressional Conduct is asked to refer the four executive-branch-tenure individuals (Israel, Sanchez, Batteh, Taylor) to the Department of Justice for § 207(a)(1) review, with Taylor as the priority case; and to treat the legislative-branch-tenure individual (Siddiqui) as a House Rule XXIII cl. 9 acceptance-threshold inquiry within the Committee on Ethics' direct jurisdiction.

57. **Client-employee contribution clusters.** The five lobbyists' client firms show systematic individual-employee giving to respondent's committees. The Chris Israel portfolio generated **\$166,575 across 127 individual contributions from 10 client firms** (Oracle \$65,885; Microsoft \$52,350; Qualcomm \$19,000; News Corporation \$10,500; Viacom \$8,000; VLSI Technology \$5,600; Comcast \$2,720; Genentech \$1,500; Aptiv \$469; U.S. Chamber of Commerce \$250). The Arshi Siddiqui portfolio generated **\$198,565 across 137 individual contributions from 12 client firms** (Intuit \$47,945; Salesforce \$42,900; Accenture \$29,500; DoorDash \$24,900; Micron Technology \$24,050; eBay, American Express, KKR, Qualcomm, Comcast, Siemens, Amazon). Two clients (Qualcomm, Comcast) are dual-represented across the Israel and Siddiqui books — two independent revolving-door lobbyists lobbying respondent's committee jurisdictions for the same clients. The combined Israel + Siddiqui cluster is \$365,140 across 264 individual contributions spanning 20 distinct client firms.
58. **Corporate-PAC control test.** Corporate-PAC giving from the 13 principal donor-universe firms to respondent is **zero across every identifier checked** (Oracle PAC; Microsoft MSVPAC; Qualcomm QPAC; News Corp PAC; Viacom / Paramount PAC; Comcast PAC; GENENPAC; Aptiv PAC; U.S. Chamber PAC; Nike PAC; Toyota PAC; AbbVie PAC; PhRMA). Respondent's publicly stated no-corporate-PAC policy is intact; the revolving-door nexus operates through individual donors — the lobbyists personally plus their client firms' employees — which is the channel that 18 U.S.C. § 207 and House Rule XXIII cl. 9 target when applied to a revolving-door ecosystem.
59. **LD-203 compliance failure — two of five omitted respondent.** Under 2 U.S.C. § 1604(d)(1)(D), each LDA-registered lobbyist must disclose all FECA-reported contributions made during the semi-annual reporting period on the LD-203 filing. Chris Israel filed his 2023 Mid-Year LD-203 with `no_contributions=False` listing three other contributions but **omitting** the Khanna \$500 contribution, which fell squarely within the January 1 – June 30 reporting window; an exhaustive scan of all 38 Israel LD-203 filings dur-

ing 2008–2025 returns zero mentions of Khanna. Robert Taylor filed his 2023 Mid-Year LD-203 affirmatively certifying `no_contributions=True` while his \$1,000 Khanna contribution of 2023-04-19 sat within the period; an exhaustive scan of all 58 Taylor LD-203 filings during 2009–2025 returns zero mentions of Khanna. The Taylor filing posture — an affirmative `no_contributions=True` certification rather than a selective omission from a populated list — is a materially stronger vehicle for a knowing-and-willful theory under 2 U.S.C. § 1606(a)(2) (civil) and § 1606(b) (criminal). The aggravating context is that Taylor made the undisclosed contribution to a House Armed Services Member while actively lobbying HASC-jurisdiction DoD primes. The three other lobbyists in the cohort (Siddiqui, Sanchez, Batteh) disclosed respondent on the relevant LD-203s and complied. *See* Exhibit I § 4.

60. **Asymmetric refund and committee-side safeguard question.** Respondent’s principal committee refunded the Chris Israel \$500 contribution 24 hours after receipt, on 2023-06-28, consistent with a committee-side compliance safeguard firing once Israel was identified as a registered Commerce-alum lobbyist. That safeguard did not fire on the Robert Taylor \$1,000 contribution of 2023-04-19, despite Taylor presenting a materially stronger HASC-jurisdiction conflict. The differential treatment is unexplained on the public record and warrants inquiry into the committee’s written refund policy and why it fired for Israel but not Taylor.
61. **Two-universe baseline on the inbound network scope.** Respondent’s 2024-cycle individual-contribution universe for the principal committee contains 60 distinct donor name-keys matching at least one LDA-registered revolving-door lobbyist. Two-universe percentile: chamber-active rank **P84.5** (denominator 1,456 active House principal committees with  $\geq 20$  individual-contribution rows during 2024); peer-46 rank **P65.9** (denominator 42 peers with FEC principal committee populated). Both universes agree — respondent is above median but is not an extreme outlier; the peer-46 cohort is tighter because it already filters for high-volume active filers. The 60 name-keys expand to 102 distinct lobbyist identifiers once surname collisions are resolved, and their aggregate 2020–2025 federal-lobbying activity covers 5,198 distinct LDA filings, 41 distinct registrants, and 459 distinct client entities — a legible portion of the DC-lobbying population whose prior federal roles (124 Congressional, 61 Financial-regulatory, 25 Commerce / International Trade, 13 Department of Defense) align with respondent’s committee domain.
62. **Outbound pipeline — null finding.** The single ex-respondent-office staffer identified in the full LDA corpus is Nandini Narayan, who joined TC Energy / TransCanada Pipelines, Ltd. on 2024-12-01 as Senior Adviser, Federal Government Relations. A scan of respondent’s bill-action corpus for the 16 months following Narayan’s move returns zero bill actions — sponsored, cosponsored, voted, or spoken-on-floor — on any pipeline, natural-gas, LNG, Keystone, Line 5, Dakota Access, or TransCanada matter. Any post-departure-

regulatory-favor theory on the outbound axis fails. The pattern is donor-inbound, not staff-outbound. *See* Exhibit I § 5.

63. **Tier-2 PFD-derived income-pattern corroboration.** The revolving-door narrative is materially corroborated, and materially narrowed, by the peer-46 Schedule C and Schedule F comparison:

- **Continuing consulting, speaking, board, and royalty income streams.** Respondent's Schedule C earned-income lines reflect five distinct continuing private-sector income streams across 2013–2024 (Wilson Sonsini Goodrich & Rosati legal fees; Stanford University lecturer fees; speaking honoraria; book-royalty stream with Levine Greenberg Rostan Literary Agency; a 2016–2020 board honorarium). Peer-46 rank is 42 of 46 — an above-peer-P90 outlier, with 35 of 46 peers at zero or one continuing-income stream. The continuing-income cluster distinguishes respondent from the peer norm and reinforces the continuing-nexus dimension of the revolving-door theory.
- **Forward-arrangement count.** Respondent's Schedule F "continuing-employment, future-employment, consulting agreements" count is zero across all years; peer-46 median is zero (ties). Count 5 expressly does not plead a forward-arrangement theory; the zero finding is preemptively disclosed.
- **Joint Venture Silicon Valley civic-nonprofit board service (2016–2020).** Respondent served as director on Joint Venture Network, Silicon Valley. This is a civic-nonprofit position with no immediate financial-interest conflict. It is disclosed for inventory completeness; it does not alter any other Count's conclusion.

The Count 5 predicate rests on the five named donors at ¶ 55, the client-employee clusters at ¶ 57, the no-corporate-PAC control at ¶ 58, the two-of-five LD-203 compliance failure at ¶ 59, the asymmetric-refund question at ¶ 60, and the scope-confirming two-universe baseline at ¶ 61 — not on any disclosed forward arrangement.

64. **Relief sought.** Department of Justice referral under 18 U.S.C. § 207 for review of the five individuals' post-employment lobbying compliance, and under 2 U.S.C. § 1605(a)(8) for referral of the Robert Taylor LD-203 false certification to the United States Attorney for the District of Columbia; Committee on Ethics review of respondent's adherence to House Rule XXIII cl. 9 acceptance thresholds, and written inquiry into the committee's refund policy addressing the Israel-refund-but-not-Taylor-refund asymmetry; Federal Election Commission LD-203 compliance audit under 2 U.S.C. §§ 1604(d) and 1606(a) covering the Israel omission and the Taylor false certification. No finding of fault against respondent on the no-corporate-PAC policy is sought; the policy is intact.

**COUNT 6 — Ahuja Charitable Foundation Spouse-Asset Disclosure Scope; Dover, Delaware Rental-Property Asymmetric Disclosure; and Household Margin-Loan / Written-Options Scaffold Foreclosing Passive-SMA or Qualified-Blind-Trust Defense**

**(Theory T301 with T701 corroboration.)**

Count 6 is anchored on four independent structural legs, each resting on primary-source records of respondent's own filings and of the Ahuja Charitable Foundation's own Form 990-PF filings: (i) the spouse-asset disclosure question under 5 U.S.C. § 13104(d)(1)(A) addressed to the Ahuja Charitable Foundation corpus and respondent's spouse's trustee and contributor record; (ii) the asymmetric disclosure of a Dover, Delaware rental property under § 13104(a)(1)(B) and § 13104(a)(3) across ten Annual PFDs; (iii) the household margin-loan and written-options record that forecloses a passive separately-managed-account, qualified-blind-trust, or exempt-investment-fund defense under § 13104(f)(3); and (iv) the donor-employer × household-PTR ticker-for-ticker overlap that corroborates the § 13104 disclosure-completeness scope question. Count 6 does not plead a 18 U.S.C. § 1001(c)(2) false-statement charging theory; earlier drafts of this Count considered such a theory based on a Schedule D "Preliminary Question D" affirmation pattern, and primary-source review of respondent's Original (rather than K-1 amended) Annual PFDs and of Part VIII of the Ahuja Charitable Foundation's Form 990-PF filings did not support charging § 1001(c)(2) on this record.

65. **Statute.** Ethics in Government Act, as recodified at 5 U.S.C. §§ 13101 et seq. by P.L. 117-286 (2022-12-27): § 13104(a)(1)(B) (earned and unearned income disclosure above \$200); § 13104(a)(3) (real-property asset disclosure); § 13104(d)(1)(A) (Member's annual PFD must disclose spouse's earned and unearned income, including from nonprofit positions with dispositive authority and from gifts or donations of property exceeding \$1,000); § 13104(f)(3) (qualified blind trust exemption conditions); § 13106 (civil penalties for knowing-and-willful failure to file or for filing a false report); **House Rule XXVI** (standing Member annual disclosure obligations); and **18 U.S.C. § 1346** (honest-services fraud), cited only as an available DOJ referral contingent on a Committee on Ethics finding of concealment. 18 U.S.C. § 201 (bribery) and 18 U.S.C. § 1001 (false statements) are noted as cognate frameworks the Committee may consider if, in the course of its review, it identifies a knowing-and-willful disclosure omission separately predicate to either statute; Count 6 does not itself plead § 201 or § 1001(c)(2) as a charging theory.
66. **Factual basis — the Ahuja Charitable Foundation as a spouse-asset disclosure question.** The Ahuja Charitable Foundation (EIN 34-1685088) is a private family foundation whose governing board is dominated by respondent's in-laws and whose corpus is managed through the Ahuja family's Goldman Sachs and Fidelity custodial accounts. The Form 990-PF records set out below are reproduced and cross-referenced at Exhibit H; the grantee and federal-lobbying overlap is developed at Exhibit Q.

- (a) **Spouse dual role.** Ritu Ahuja Khanna, respondent's spouse, is both (i) a named trustee of the Ahuja Charitable Foundation continuously from tax year 2018 through tax year 2024 per the Foundation's own Form 990-PF officer schedules — seven consecutive tax years, the full window of the Foundation's e-file 990-PF filings in the IRS Tax Exempt Organization e-file corpus, with title, hours per week (5), and compensation (\$0) constant across all seven years — and (ii) a Schedule B substantial contributor to the Foundation in tax years 2022, 2023, and 2024, reporting respondent's Washington, D.C. residence (4432 Chestnut Lane NW) as her contributor address. *See* lake.irs\_990\_officers WHERE ein='341685088'; lake.irs\_990\_contributors WHERE ein='341685088'; Ex. H §2(A)–(B).
- (b) **A \$45 million corporate-stock corpus overlapping committee jurisdictions.** The Foundation's 2024 Form 990-PF reports \$45,102,055 in end-of-year fair market value across nine distinct managed investment accounts — a primary Goldman Sachs / Fidelity account plus eight Fidelity sub-accounts including a dedicated covered-calls account and a Diamond Hill sleeve. The Foundation's Schedule B non-cash contribution record across tax years 2022 through 2024 further reports defense-prime share donations in Honeywell, L3Harris Technologies, TransDigm Group, Boeing, and GE Vernova — tickers falling within the House Armed Services Committee jurisdiction on which respondent sits — alongside healthcare-sector positions that overlap respondent's House Oversight Committee jurisdiction. The 2024 Schedule of Investments lists the corpus at the managed-account level through the Ahuja family's Goldman Sachs and Fidelity custodial infrastructure. *See* Ex. H §2(C).
- (c) **Non-cash stock donations in the same sectors respondent oversees.** In tax year 2024, Ritu Ahuja Khanna donated 2,821 shares of NVIDIA Corporation to the Foundation, and the Monte / Usha Ahuja Family Trust (81 Seagate Drive, Naples, FL 34103) donated an additional 7,255 shares of NVIDIA across two separate Non-Cash Property Contribution schedules — a combined tax-year-2024 household-to-Foundation NVIDIA transfer of 10,076 shares, reported on IRS 990-PF Schedule B at a combined fair market value of \$1,667,345 at the time of donation (with subsequent post-donation share-price appreciation further amplifying the household-to-Foundation wealth flow). Non-cash donations in tax years 2022 through 2024 additionally include Honeywell (483 and 66 shares in the 2022 tranche), L3Harris Technologies, TransDigm Group, Boeing, and GE Vernova defense-prime positions. *See* Ex. H §2(D).
- (d) **District-proximate grantmaking.** Deduplicated grant totals from the Foundation's own Schedule of Grants for tax years 2020 through 2024 concentrate

in Cleveland (University Hospitals Health System, approximately \$3.9 million across 10 grants, including a single \$1.7 million grant in tax year 2021), Naples (NCH and allied Naples philanthropies, more than \$1.4 million), and Washington, D.C. (Ford's Theatre Society, Georgetown University). None of the grantees sit within respondent's CA-17 district. Six of the eleven top grantees lobby Congress at high volume on issue codes that fall within respondent's Oversight and Budget Committee jurisdictions (Health Issues, Medicare / Medicaid, Budget / Appropriations). *See* Ex. Q §§2–4.

67. **Disclosure scope question (operative).** Respondent's Annual Personal Financial Disclosures during his House tenure do not disclose the Foundation corpus as a spouse-held asset, do not disclose the spouse-trustee role, and do not cross-reference the Foundation's own Form 990-PF filings by EIN. Whether that corpus, under the governance facts set out in paragraph 66, falls within the spouse-asset disclosure scope of 5 U.S.C. § 13104(d)(1)(A) is an interpretive question for the Committee on Ethics, drawing on Office of Government Ethics Letter Opinion 03-2 and Department of Justice Advisory Opinion 170 as persuasive secondary authority. The corresponding narrower question — whether respondent **himself** holds a trustee role at the Foundation — is answered in the negative by primary-source evidence: respondent is not named in Part VIII of any reviewable Form 990-PF year for the Foundation (Part VIII requires listing every officer, director, trustee, and key employee without any compensation or hours threshold). Respondent's 2020 Original Annual PFD Schedule E self-disclosed an informal trustee-style position, which his 2021 Original PFD annotated "No longer hold this position"; that pattern is consistent with a self-corrected over-disclosure of an informal family-philanthropy role, not a concealment of one. The surviving Count 6 question is therefore the spouse-scope question (respondent's spouse as trustee of a spouse-held asset), not a respondent-himself-as-trustee question.
68. **Dover, Delaware rental-property asymmetric-disclosure defect under § 13104(a)(1)(B) and § 13104(a)(3).** Respondent's tax-year-2021 Annual PFD Schedule D discloses a \$100,001–\$250,000 mortgage liability to First Bank of Wilmington, Delaware tied to a Dover, Delaware rental property. A comprehensive re-extraction of respondent's ten Annual PFDs for tax years 2014 through 2023, covering 2,524 Schedule-A through -H rows, supports three independent structural legs and one corroborating leg, presented in order of evidentiary weight:
- (A) Schedule A asset-side ten-year omission.** Zero Schedule A real-estate asset entries referencing "Dover," "Delaware," or "First Bank of Wilmington" appear on any year across tax years 2014 through 2023. A rental property categorically reportable under § 13104(a)(3) — interest in real property held for investment or production of income, value greater than \$1,000 — does not appear on any Schedule A asset line across ten consec-

utive Annual PFDs. The ten-year scan is respondent-scoped and complete; this leg does not depend on any chamber-wide re-extraction.

**(B) Schedule D liability mismatch — asset-liability pairing absent.** The disclosed mortgage liability stands without any companion Schedule A asset across the same filing year or any adjacent year. A \$100,000–\$250,000 mortgage debt against a real-property interest held by the filer, spouse, or dependent child is categorically reportable under § 13104(a)(3); the structural mismatch between the single disclosed liability and the ten-year asset null is independently probative of a disclosure defect.

**(C) Six paired-disclosure exemplars — “filer knows the pattern” rebuttal.** Every other rental property disclosed on Schedule A across the ten-year window carries correctly paired asset-side and income-side entries:

Rental property	Schedule A asset disclosed?	Schedule B / Schedule C income disclosed?
Cincinnati OH	YES	YES
Denham LA	YES	YES
Walton Hills OH	YES	YES
Harahan LA (commercial)	YES	YES
Ritu Ahuja Revocable Trust	YES	YES
NY condo		
Walton OH	YES	YES
<b>Dover DE</b>	<b>NO</b> (across all ten years)	<b>NO</b> (across all ten years)

The filer household demonstrably knows the correct disclosure pattern; six of seven rentals follow it; the Dover, Delaware rental is the sole asymmetric outlier. This rebuts any “reasonable interpretation of the filing form” or good-faith-confusion defense.

**(D) Schedule B rental-income ten-year null — corroborating.** The same re-extraction returned zero Schedule B transactions and zero Schedule C earned-income lines referencing the Dover DE property across tax years 2014 through 2023. Peer spot-checks (Pelosi, McCaul, Crenshaw) show other high-volume Members with zero Schedule B rows in the currently-extracted subset, which is consistent with incomplete chamber-wide coverage of Schedule B rather than with sparse-filer-normal behavior. Accordingly, this leg is presented as corroborating rather than primary pending validation of the chamber-wide Schedule B extraction; the structural § 13104(a)(1)(B) and § 13104(a)(3) asymmetry on Schedule A and Schedule D alone is dispositive.

See Ex. EE (Dover, Delaware rental-property disclosure timeline); House Clerk Financial Disclosure portal TY2021 filing.

69. **Household margin-loan and written-options scaffold foreclosing passive-SMA / QBT / EIF defense under § 13104(f)(3).** Respondent has publicly attributed household trading to a separately-managed-account structure. Direct OCR of respondent's 2024 Annual PFD (Ex. L) discloses no SMA broker, no qualified-blind-trust certification, and no discretionary third-party custodian; no qualified-blind-trust mark appears on any Annual Schedule A across the ten-PFD window. The Annual Schedule D filings, re-extracted across tax years 2017 through 2020, reveal a household margin-loan facility that emerges upon respondent's arrival in Congress and persists as follows:

- **Tax year 2017:** Goldman Sachs margin liability — "Over \$1,000,000" band (single liability, first appearing approximately ten months post-swearing-in).
- **Tax year 2018:** Goldman Sachs margin  $\times$  2, combined \$265,000–\$550,000 band.
- **Tax year 2019:** Ritu Ahuja 1994 Trust margin \$100,000–\$250,000 plus Goldman Sachs margin \$250,000–\$500,000.
- **Tax year 2020:** combined margin exposure \$500,000–\$1,000,000 across two liabilities.

All margin creditors are SP-owner-coded. This financing scaffold is temporally and mechanically paired with active **written-PUT-option transactions** in the same family-trust accounts, documented across the corresponding PTR inventory. Under Regulation T and standard brokerage margin agreements, writing options on margined accounts requires **customer authorization** and cannot be characterized as passive broker discretion. The combined record therefore forecloses any passive-SMA, qualified-blind-trust, or exempt-investment-fund defense under § 13104(f)(3): a passive custodial structure cannot originate written-option orders in margin-collateralized accounts. *See* Ex. CC (Goldman-lender margin-loan ladder and written-options scaffold); Ex. L (2024 Annual PFD SMA / QBT null).

70. **Donor-employer  $\times$  household-PTR overlap corroboration.** Ticker-for-ticker convergence between the employer-cluster funding respondent's principal committee and the household PTR inventory: Alphabet (265 household transactions), Microsoft (175), Adobe (164), Morgan Stanley (158), Apple (147), Oracle (99), Meta / Facebook (165), Salesforce (116), KKR (66), and Synopsys (63) — each ticker is simultaneously a top-employer donor cluster to respondent's principal committee and a household-traded ticker. The PTR denominator across respondent's House tenure is 37,238 transactions. The Ahuja Charitable Foundation corpus additionally overlaps on 19 tickers with the household PTR inventory. The pattern materially corroborates the Count 6 disclosure-integrity framing: a spouse-held Foundation corpus, margin-collateralized family-trust accounts with active written-options exposure, and donor-employer  $\times$  household-traded-ticker convergence all present the same § 13104 scope question — whether respondent's PFD inventory completely reflects all reportable interests subject to the committees of jurisdiction on which

he serves. *See* companion House Ethics submission §3.3 (principal-committee employer cluster × household PTR crosswalk).

71. **Relief sought.** Committee on Ethics interpretive review under 5 U.S.C. § 13104(d)(1)(A) on the Ahuja Charitable Foundation corpus (spouse-as-trustee-of-spouse-held-asset question, with the narrower respondent-himself question recorded as answered in the negative by primary-source evidence and preserved in the record as a candor disclosure), drawing on Office of Government Ethics Letter Opinion 03-2 and Department of Justice Advisory Opinion 170 as persuasive secondary authority; Committee on Ethics review under House Rule XXVI for:

- **§ 13104(a)(1)(B) and § 13104(a)(3) Dover, Delaware rental-property asset-and-income non-disclosure across ten Annual PFDs** (Ex. EE) — per-year corrective-filing findings and any § 13106 waiver analysis the Committee deems appropriate;
- **§ 13104(f)(3) compliance of the household margin-loan and written-options scaffold** (Ex. CC) against any prior Annual PFD or public statement asserting a passive SMA / QBT / EIF structure inconsistent with the disclosed margin and written-options record;
- amended-PFD requirement for any year the Committee finds § 13104 disclosure absent;
- civil penalties under 5 U.S.C. § 13106 at the Committee’s discretion;
- 18 U.S.C. § 1346 honest-services consideration contingent on a Committee on Ethics scope finding on the Foundation question (not charged standalone in this Count).

The Committee’s investigation may usefully obtain via subpoena: (a) respondent’s household joint income tax returns for tax years 2014 through 2024 (to establish completeness of rental-income reporting for the Dover, Delaware property and margin-account interest expense); (b) Ahuja Charitable Foundation internal governance documents (to resolve the § 13104(d)(1)(A) spouse-authority question); and (c) PFD preparation communications within respondent’s office.

#### IV. DAMAGES AND DISGORGEMENT

72. **Aggregate economic gain.** Per Exhibit A (damages computation), the respondent’s household’s estimated terminal mark-to-market profit and loss on in-scope sector trades during his House tenure is:

Metric	Low	Mid	High
Notional traded	\$11.5M	<b>\$39.7M</b>	\$67.9M
Terminal P&L	\$14.6M	<b>\$61.0M</b>	\$107.5M
SPY baseline	—	\$32.9M	—
<b>Alpha over SPY</b>	—	<b>\$28.2M</b>	—

73. **Window-attributable share.** 41.3% of midpoint terminal P&L (**\$25.2M**) was generated by trades placed within  $\pm 14$  calendar days of an NDAA enactment, CMS rulemaking action, 8-K filing by the same company on the same calendar day, or USAspending prime-contract action to the same company. This share is substantially above the 30% threshold that signals non-random event-window trading concentration.
74. **T+30 short-window signal.** Of \$509,114 in household T+30 mark-to-market P&L, \$293,646 (57.7%) is attributable to trades placed inside an event window — a 3.4 $\times$  per-trade ratio between windowed and non-windowed T+30 P&L, consistent with an MNPI-driven timing advantage rather than long-horizon skill.
75. **Sector-level alpha attribution (midpoint).** Per-sector alphas sum to \$28.16M, matching the headline alpha figure at ¶ 72.
- Big Tech: \$27.6M alpha
  - Defense Prime: \$5.4M alpha
  - Defense Tech: \$0.7M alpha
  - Pharma: -\$2.2M alpha (negative; not claimed)
  - Healthcare Devices: -\$2.9M alpha (negative; not claimed)
  - Healthcare Services: -\$0.3M alpha (negative; not claimed)
76. **Disgorgement benchmark.** STOCK Act §9 disgorgement principles, applied conservatively, would target the alpha-over-SPY midpoint of \$28.2M as the recoverable amount; a less-conservative disgorgement theory would target full in-window P&L of \$25.2M as insider-timing proceeds. The alpha and in-window figures differ because they measure different things (directional outperformance vs. event-timing concentration); either is a defensible floor for disgorgement.

## V. CIVIL PENALTIES AND SANCTIONS SOUGHT

77. **Count 1 (STOCK Act § 6 late filings).** Statutory-minimum per-document civil penalty calculation under 5 U.S.C. § 13106; no knowing-and-willful elevation sought under this Count. The operative Count 1 axis is aggregate dollar-weighted composite exposure (approximately \$41.3 million, chamber P93, peer-cohort P91), not per-transaction extreme-outlier severity.

78. **Counts 2 and 3 (STOCK Act §§ 3-4 MNPI trading).** Disgorgement of approximately \$5.4 million (defense-prime alpha, Count 2) plus pharmaceutical- and healthcare-sector trading volume referred to the Securities and Exchange Commission for Rule 10b-5 analysis; Committee recommendation of reprimand; recusal from CMS / HHS and defense-appropriations matters pending resolution.
79. **Count 4 (insider-pattern trading convergence).** Disgorgement under STOCK Act § 9 principles of profit attributable to same-day-issuer-event or same-day-officer-aligned trading; referral to the Department of Justice for 15 U.S.C. § 78ff review on any single trade within the windowed sets that reflects willful use of material non-public information; Committee-on-Ethics review of whether the four-substrate absolute-count convergence reflects MNPI use within the meaning of 15 U.S.C. § 78u-1(g).
80. **Count 5 (revolving door).** Referral to the Department of Justice for 18 U.S.C. § 207 review of the five named individuals; Committee finding on House Rule XXIII cl. 9 acceptance thresholds; Federal Election Commission LD-203 compliance audit covering the Israel omission and the Taylor false certification.
81. **Count 6 (spouse-foundation disclosure scope; Dover, Delaware rental asymmetry; § 13104(f)(3) margin-loan and written-options scaffold).** Committee on Ethics review under House Rule XXVI for § 13104(a)(1)(B) and § 13104(a)(3) Dover, Delaware asymmetric disclosure (Exhibit EE) and § 13104(f)(3) separately-managed-account / qualified-blind-trust / exempt-investment-fund consistency against the margin-loan and written-options record (Exhibit CC); Committee on Ethics interpretive review under § 13104(d)(1)(A) on the Ahuja Charitable Foundation corpus, drawing on Office of Government Ethics Letter Opinion 03-2 and Department of Justice Advisory Opinion 170 as persuasive secondary authority (spouse-as-trustee question operative; respondent-himself question recorded as answered in the negative on the primary-source record); amended-PFD requirement for any year the Committee finds § 13104 disclosure absent; civil penalties under 5 U.S.C. § 13106 at Committee discretion; 18 U.S.C. § 1346 honest-services consideration contingent on a Committee on Ethics scope finding.
82. **Aggregate disgorgement target.** \$25.2 million to \$28.2 million, Treasury-allocable.

## VI. ANTICIPATED RESPONSES

The respondent's representatives will likely advance the following arguments. Each is addressed below.

83. **Response #1 — "Spouse separately managed account; I do not control the trades." Mitigated.** Respondent's Annual Personal Financial Disclosures do not disclose any separately managed account broker, qualified blind trust, or third-party discretionary custodian.

Independent confirmation runs through the household's full Periodic Transaction Report record: a page-level audit of all 114 PTRs filed during respondent's House tenure attributes substantially every reportable transaction to one of approximately a dozen named Ahuja- and Ahuja-Khanna-family trusts (Ritu Ahuja 1994 Trust, Ritu Ahuja 1995 Trust, Ahuja Khanna Children Irrevocable Trust, Monte and Usha Ahuja 2010 Irrevocable Trust FBO Grandchildren, Ritu Ahuja Declaration of Trust, Ahuja Grandchildren's Education Trust, 2020 Trust FBO Khanna Children, M & R Trust Partnership, and related vehicles); zero rows in that record attribute to any Schwab, Fidelity, Vanguard, Morgan Stanley, Goldman Sachs, or Merrill brokerage account, no SEC-registered investment-adviser SMA, and no qualified-blind-trust certification. The separately-managed-account defense is factually absent from both filing streams. Respondent's spouse-owner-coded and dependent-child-owner-coded trade share is **99.997 percent** of the household's 37,238 disclosed transactions (peer-cohort rank tied in a five-peer cluster at or near 100 percent). In the absence of a qualified custodial structure on either record, that 99.997 percent non-self-owner share is evidence of structural reliance on non-custodial spouse and dependent-child accounts for executing household trades, not evidence of insulation. *See* Exhibit L (PFD asset catalog and PTR-side cross-confirmation).

84. **Response #2 — “Below-median on rate and on per-transaction severity.” Acknowledged and preempted.** Respondent's late-filing rate (1.74 percent) sits below chamber median (approximately 10.1 percent) and below active-trader-cohort median (approximately 6.0 percent). Respondent's worst single-transaction delay (358 days) sits essentially at chamber median and below active-trader-cohort median. The operative Count 1 axis is therefore **not** rate or per-transaction severity; it is **aggregate dollar-weighted composite exposure** (approximately \$41.3 million, chamber rank 15 of 210, P93; active-trader cohort rank 5 of 43, P91). The composite dimension captures the household's 37,238-transaction full-tenure volume combined with 624 late transactions to produce a top-decile composite score in both universes. A below-median rate and median per-transaction-worst do not mitigate the above-P90 composite finding, because the composite metric measures volume × scale × aggregate delay rather than per-trade exceptionality. *See* Count 1 ¶ 18 (chamber-baseline disclosure, three dimensions, both universes); Exhibit B; Exhibit C; Exhibit A.
85. **Response #2b — “Respondent does not over-concentrate in defense primes.” Acknowledged and preempted.** Respondent's defense-prime trade share is **1.24 percent** (450 defense-prime trades across 36,297 household transactions), at peer-cohort median. The complaint does not allege defense-sector over-concentration. Count 2's probative value lies in the **timing** of defense-prime trades (NDAA enactment windows, ±14 days), the **direction** (pre-passage accumulation against public NAY votes), and the House Armed

Services Committee jurisdictional nexus — not in sector-share ratios. The peer-median defense-prime rate, disclosed here, does not mitigate the temporal-clustering finding.

86. **Response #6 — “The Chris Israel donation is one data point.” Mitigated.** Five separately documented ex-federal-agency individuals — Israel, Siddiqui, Sanchez, Batteh, and Taylor — each registered as a federal lobbyist and each contributing to respondent’s principal committee, with client portfolios aligning to House Armed Services and House Oversight jurisdictions and an associated client-employee individual-contribution cluster totaling approximately \$166,575 from the Israel book and approximately \$198,565 from the Siddiqui book, demonstrate a pattern, not an isolated data point. *See* Exhibit I.
87. **Response #7 — “No 18 U.S.C. § 207 violation without direct communication.” Mitigated.** The complaint refers 18 U.S.C. § 207 review to the Department of Justice, which has subpoena authority over the communications respondent’s representatives are entitled to have tested. The complaint does not ask the Office of Congressional Conduct to find a § 207 violation; it asks for a referral.
88. **Response #8 — “Respondent votes publicly against defense appropriations.” Mitigated.** The public-NAY / private-BUY divergence *is* the materiality fact. Household *purchases* of the bills’ beneficiaries during enactment windows are the operative act; a NAY vote does not cancel the benefit to the Member’s household portfolio when the bill passes (as all four cited NDAAs did). *See* Count 2 ¶ 25 (public-NAY / private-BUY divergence); Exhibit E.
89. **Response #9 — “Ahuja Foundation grantmaking is district-consistent.” Mitigated.** The operative question is not the grantmaking footprint. It is (a) the approximately \$45 million corporate-stock corpus (nine distinct managed investment accounts at Goldman Sachs and Fidelity) and its sector concentration overlapping respondent’s House Armed Services and House Oversight committee jurisdictions; (b) the spouse’s concurrent trustee and Schedule B substantial-contributor roles across the Foundation’s Form 990-PF filings; and (c) the absence of any cross-reference to the Foundation on respondent’s Annual PFDs across the filings reviewed. *See* Exhibit H.
90. **Response #11 — “Ex-federal employment alone is not actionable.” Mitigated.** The complaint does not allege actionability on prior federal service alone. It alleges a pattern: current LDA registration plus portfolio overlap with respondent’s committee jurisdictions plus donation flow to respondent’s principal committee. Prior federal employment is a premise of the pattern, not the claim itself.
91. **Response #12 — “Respondent is captured by donors.” Acknowledged and preempted.** Respondent’s PAC-side donor-capture exposure is structurally the cleanest among 2024-cycle House Democrats. Along three diagnostic dimensions, the donor-capture pathway is absent: **(a) PAC dependency** — 2024-cycle PAC share 0.019 percent

of receipts (\$2,000 of approximately \$10.57 million), chamber rank 4 of 219 Democratic incumbents (approximately P0.5); lifetime seven-cycle PAC share 0.011 percent (\$4,750 across approximately \$41.74 million), with respondent's office actively refunding PAC checks within 24 hours of receipt. **(b) Form 3L bundler disclosure** — respondent's principal committee carries exactly one Form 3L across the entire 2010 through 2026 universe, a JStreetPAC bundling (\$25,750 cycle aggregate) ideologically aligned with respondent's Israel-policy voting record. **(c) AIPAC / JStreet bundler split** — respondent carries zero AIPAC-universe bundling. The complaint rests on conduct (household trading, Foundation routing, NDAA-window timing, CMS-rulemaking-window timing, same-day-issuer-event trade pattern, aligned-direction insider-officer same-day trades), not on contribution-side capture.

92. **Response #12a — “Complainant seeks to relitigate MUR 7062.” Acknowledged and preempted.** For full procedural candor, respondent's principal committee Ro For Congress previously entered a Pre-Probable-Cause Conciliation Agreement in Matter Under Review 7062, executed October 26, 2021, following a 6-0 Federal Election Commission vote of October 12, 2021. Co-respondents were the committee's treasurer, RevUp Software, Steven Spinner, and Numero. The matter concerned alleged violations of 52 U.S.C. § 30111(a)(4) and 11 C.F.R. § 104.15(a) arising from the committee's use of RevUp Software's FEC-database-derived fundraising tool. Candidate Khanna personally received a “Dismissed-Other / No action taken” disposition. The present Counts and accompanying referrals do not seek to relitigate Matter Under Review 7062. They are factually and legally distinct from the fundraising-software-database-access matter adjudicated in Matter Under Review 7062. No res-judicata or issue-preclusion doctrine attaches. Matter Under Review 7062 is disclosed here for procedural hygiene and because it is the sole prior adverse civil FEC action of record against respondent's committee.
93. **Response #13 — “Respondent is a known progressive who criticizes Big Tech and champions reform.” Acknowledged and preempted.** Respondent's progressive public posture — the no-PAC pledge, the No PAC Caucus, the No PAC Act, the Member stock-trading-ban legislation, and the corporate-power critique — is documented and not contested. The complaint is not directed at respondent's public legislative posture or rhetoric; it is directed at the **disconnect between** respondent's public-facing posture and respondent's household-facing trading conduct. Respondent has issued at least eight dated public statements demanding a Member stock-trading ban or condemning Member trading between September 14, 2023 and April 15, 2026, paired with approximately 5,681 household transactions within  $\pm 30$  calendar days of those statements totaling between approximately \$30.5 million and \$156.2 million in notional. The headline instance: on December 27, 2024, respondent published an X post demanding that Members of Congress be banned from trading stocks; on the same calendar day, his household executed BUY or

ders in OKTA and Ultra Clean Holdings (spouse-owned). The progressive rhetoric and the household trading conduct are simultaneous, not sequential. The complaint is built on that disconnect, not on a claim that respondent's public posture is itself fraudulent. *See* Exhibit T (stock-trading-reform statement timeline); Exhibit M (same-day 8-K pattern); Exhibit H (Ahuja Foundation corpus); Exhibit E (NDAA enactment windows).

94. **Response #13a — “Respondent has no forward private-sector commitment; the revolving-door allegation is speculative.” Acknowledged and preempted.** Respondent's Annual Personal Financial Disclosure Schedule F entries are zero across every reporting year for “continuing employment, future employment, and consulting agreements,” and no audit-derived evidence of any undisclosed forward arrangement exists. Count 5 does not rest on any forward-arrangement predicate. It rests on (a) the five documented ex-federal-agency individuals who registered as LDA lobbyists and donated to respondent's principal committee; (b) the approximately \$166,575 client-employee donor cluster from the Chris Israel book and the approximately \$198,565 client-employee donor cluster from the Arshi Siddiqui book; (c) the two-of-five LD-203 compliance failure (Israel selective omission, Taylor affirmative false certification); and (d) respondent's continuing Schedule C consulting, speaking, and royalty income streams during House tenure (five distinct streams across 2013–2024, above-P90 in the active-trader peer cohort). The zero Schedule F finding is itself exculpatory on the forward-arrangement dimension, and the complaint expressly does not plead it.
95. **Response #14 — “Complainant's trade citations are contaminated by OCR or extractor audit flags.” Acknowledged and preempted.** Every one of the 28 specific household transactions cited throughout this complaint carries zero extraction-pipeline audit flags in the authoritative substrate. Each cited trade was (a) eyeball-verified against the source House Clerk PDF in the Verification Packet; (b) independently located via Gemini OCR re-extraction with exact row-quote capture; and (c) cross-validated against the canonical transaction-grain amendment-cascade-deduplicated view. The cited trades were additionally cross-validated against the two largest public Congressional-trade trackers — Capitol Trades and QuiverQuant: **eleven of twelve** CMS / IRA pharma cohort trades achieve three-way corroboration (92 percent), and **twenty-one of twenty-eight** cited trades achieve at least two-of-three agreement (75 percent) across lake, Capitol Trades, and QuiverQuant. Documented third-party tracker defects (QuiverQuant ticker corruption on two PLTR documents; QuiverQuant year-digit parse defect on one CIGNA row; Capitol Trades pre-April-2023 coverage gap affecting five early NDAA-window trades) are disclosed for candor; all are orthogonal to the authoritative House Clerk PDF substrate. *See* Exhibit FF for the full per-trade agreement table.

The ten predicted defense arguments are therefore nine mitigated and one open (Response #5, dual FARA / LDA registration, open at moderate severity). Zero fatal arguments remain. Five

additional preemptive rebuttals — Responses #2, #2b, #12, #12a, and #13 — preempt likely rate-based, sector-share, donor-capture, MUR-7062-preclusion, and progressive-credentials defenses with chamber-baseline, peer-cohort-baseline, bundler-universe, temporal-divergence, and prior-enforcement-distinguishability data.

## VII. EXHIBIT LIST

OCC\_EXHIBIT\_LIST.md is the complete exhibit catalog and governs cross-reference in any event of conflict. The following summary is incorporated here for the convenience of the reader:

Ex.	Title	File
A	Damages computation	../EXHIBIT_DAMAGES.md
B	Late-filing audit	../EXHIBIT_LATE_FILING_AUDIT.md
C	Peer baseline	../EXHIBIT_PEER_BASELINE.md
E	NDAA enactment-window defense-prime trade pattern	../EXHIBIT_E_NDAA_WINDOW.md
F	CMS × pharma rulemaking trades	../EXHIBIT_F_CMS_PHARMA.md
H	Ahuja Charitable Foundation disclosure chain	../EXHIBIT_H_AHUJA_FOUNDATION.md
I	Revolving-door inventory (merged donor inventory + LD-203 compliance)	../EXHIBIT_REVOLVING_DOOR.md
J	Khanna × Gottheimer same-day-trade coordination audit (second-respondent framing)	../EXHIBIT_J_GOTTHEIMER_COORDINATION.md
K	PFD Schedule A asset list	../EXHIBIT_K_KHANNA_PFD_SCHEDULE_A_ASSETS.csv
L	2024 PFD separately-managed-account rebuttal (rendering + OCR)	../EXHIBIT_L_PFD_SMA_SCHEDULE.md
M	Same-day 8-K trade pattern	../EXHIBIT_M_SAME_DAY_8K.md
N	Palantir × Air Force same-day cluster	../EXHIBIT_N_PALANTIR_TIMELINE.md

Ex.	Title	File
O	NVIDIA share-donation timing (Ahuja Foundation routing)	../EXHIBIT_O_NVIDIA_ DONATION_TIMING.md
Q	Ahuja Foundation grantees × federal lobbying overlap	../EXHIBIT_Q_AHUJA_ GRANTEES_LOBBYING.md
R	Options-leverage analysis	../EXHIBIT_R_OPTIONS_ LEVERAGE.md
T	Stock-trading-reform statement timeline	../EXHIBIT_T_STOCK_ACT_ REFORM_IRONY.md
U	NAY-but-BUY systematic chamber-wide expansion	../EXHIBIT_U_NAY_BUT_ BUY_SYSTEMATIC.md
V	Four-Member cluster (structural-bipartisan context)	../EXHIBIT_V_FOUR_ MEMBER_CLUSTER.md
X	FDA Advisory Committee × pharma trade windows	../EXHIBIT_X_FDA_ADCOM_ PHARMA_WINDOWS.md
Z	Aligned-direction named-officer same-day trades	../EXHIBIT_Z_86_ALIGNED_ INSIDER_MATCHES.md
CC	Household margin-loan and written-options scaffold	inline (see Count 6 ¶ 69)
EE	Dover, Delaware rental-property asymmetric disclosure	../EXHIBIT_EE_DOVER_DE_ DISCLOSURE.md
FF	Three-way trade-citation agreement table	../EXHIBIT_FF_3WAY_ AGREEMENT.md
II	Household asset-evolution timeline and family-entity inventory (2013–2024)	../EXHIBIT_II_ASSET_ EVOLUTION.md
JJ	Systematic XSP short-volatility options program (282 spouse-coded PUT-option transactions)	../EXHIBIT_JJ_OPTIONS_ SHORT_VOL.md

## VIII. VERIFICATION

I, the undersigned, declare under penalty of perjury under the laws of the United States of America that the foregoing Complaint, based on my review of the public-record evidence cited herein, is true and correct to the best of my knowledge and belief.

Signed this \_\_\_\_ day of \_\_\_\_\_, 2026.

/s/ Kevin Bass

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**Kevin Bass**, complainant

Email: ruokalalokkim@gmail.com

Mailing address: \_\_\_\_\_

Daytime telephone: \_\_\_\_\_

No counsel of record.

### CERTIFICATE OF SERVICE

I hereby certify that on the \_\_\_\_ day of \_\_\_\_\_, 2026, I caused a true and correct copy of the foregoing Complaint, together with the complete exhibit package identified in Section VII and the SHA-256 manifest 99\_SHA256SUMS.txt, to be served upon the Office of Congressional Conduct, U.S. House of Representatives, and upon the following parallel-referral offices via the accompanying cover memos:

- **U.S. Department of Justice, Public Integrity Section**
- **House Committee on Ethics** — supporting material held available upon Office-of-Congressional-Conduct referral

/s/ Kevin Bass

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Kevin Bass, complainant

## Appendix A — Provenance Index

This Appendix maps every load-bearing factual claim in the body above to its underlying canonical fact-store record(s), independent verification record(s), and the lake-substrate query whose digest anchors the cited substrate. The manifest is generated from `_provenance_index_occ.json` (committed alongside this filing). The Office’s preliminary review under House Rule XII (Rules of the Office of Congressional Conduct, 119th Cong.) is framed against the substrate enumerated here.

**How to read.** *Claim ID* keys into the manifest JSON. *Facts* are `ro_khanna.v3_facts` records (F<id>). *Verifications* are `ro_khanna.v3_fact_verifications` records (V<id>); a verification is an independent re-derivation against the cited substrate at the verification timestamp. *Substrate* is the lake table or canonical view the claim resolves against. *Digest* is the SHA-256 of the normalized reproducibility block adjacent to the claim’s first appearance — the digest moves only when the underlying query text moves; substrate row-level drift surfaces through the verification lifecycle, not through the digest.

**Generated:** 2026-05-03T00:47:09+00:00 (session `K_ro_khanna_occ_complaint_s03_2026-05-02`).  
**Entries:** 80. **Filing:** `OCC_COMPLAINT_KHANNA`.

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Claim						
ID	§	Claim summary	Facts	Verif	Substrate	Digest
OCC_M001	I	Subject: Rep. Rohit ‘Ro’ Khanna (D-CA-17), sworn in January 3, 2017, currently fifth-term Member of the 119th Congress.	F745	—	lake.congress_members WHERE bioguide_id='K000389'	—
OCC_M002	I	Committee assignments confer MNPI access: HASC (NDAA / DoD primes), HOCR/HSGO (HHS/CMS/FDA), House Budget.	F41, F58, F284, F653, F654, F728, F1033, F1119 (+1 more)	V261, V283, V296, V331, V431, V659	lake.congress_committee_assignments WHERE bioguide_id='K000389'	
OCC_M003	I	Household composition: respondent + spouse Ritu Ahuja Khanna (SP) + one dependent child (DC); spouse named trustee + substantial contributor of Ahuja Charitable Foundation (EIN 34-1685088).	F339, F382, F384, F414, F415, F751, F996	V155, V576, V585, V587, V612	lake.irs_990_officers WHERE ein='341685088'	—

Claim						
ID	§	Claim summary	Facts	Verif	Substrate	Digest
OCC_M005	II.D	Direct Tesseract OCR of 2024 Annual PFD (House Clerk doc 8221318): no SMA / no QBT / no third-party discretionary custodian disclosed; PTR-side cross-confirmation across all 114 PTRs.	F38, F80, F209, F474, F807	V295, V418, V442, V445	ro_khanna.pfd_schedule_a_assets WHERE doc_id='8221318'; Tesseract OCR text at data/ocr_products/khanna_pfd_8221318_OCR.t	
OCC_M006	II.B	Household PTR corpus auditable rows: 35,954 transactions across 114 PTRs filed under 5 U.S.C. § 13105(l) during 2017-2026 tenure.	F437	—	lake.house_ptr_transactions_canonical c JOIN lake.house_ptr_index ON c.earliest_filing_uuid = i.filing_uuid WHERE i.member_last_name='Khanna' AND i.state_district='CA-17'	
OCC_M007	III.1	Late-filing count: 624 of 35,954 transactions (1.74%); 22 distinct PTR documents with $\geq 1$ late transaction.	F232	—	ro_khanna.ptr_filing_audit WHERE days_past_45 > 0 AND audit_flag='auditable'	—
OCC_M008	III.1	Worst single-transaction delay: 358 days (HUMANA INC common stock, DC owner, traded 2023-10-02, filed 2024-11-08).	F486, F610, F669	—	ro_khanna.ptr_filing_audit WHERE asset_name ILIKE '%HUMANA%' AND owner='DC' ORDER BY days_past_45 DESC LIMIT 1	—
OCC_M009	III.1	Dollar-weighted composite score: ~\$41.3M (late-midpoint dollars $\times$ worst-days/365 $\times$ $\ln(1+n_{\text{late\_tx}})$ ).	F231, F232, F612, F628, F840	V233	public.house_ptr_chamber_audit_dollar_weight WHERE member_last_name='Khanna' AND state_district='CA-17'	
OCC_M010	III.1	Chamber rate baseline: 10.06% chamber-wide STOCK Act § 6 late-filing rate across 210 Members with $\geq 20$ auditable transactions.	F231, F234, F242, F243, F244, F277, F520, F610 (+1 more)	V448, V454, V457, V458, V468, V469	public.house_ptr_chamber_audit_by_member WHERE n_tx_total $\geq 20$ /* P50 of late_rate_pct */	
OCC_M011	III.1	Khanna chamber rank 52/210 P24.4 on	F227	V596	public.house_ptr_chamber_audit_by_member	

Claim						
ID	§	Claim summary	Facts	Verif	Substrate	Digest
OCC_M013	III.1	Severity vacation: 10 of 13 prior-cited SEVERE PTR docs re-extract to 0 days late under independent Tesseract OCR; F229/F239/F217 framing VACATED.	F486	—	ro_khanna.v3_facts WHERE fact_id IN (486, 610) AND status='active'; see .claude/rules/peer-baseline.md \$canonical post-cascade	—
OCC_M014	III.1	Same-day SEC Form 8-K intersection: 186 distinct household trades executed on the same calendar day as the issuer's 8-K; chamber rank 1 of 96 (4.3× second-place Member).	F310, F313, F335, F346, F355, F446, F505, F606 (+3 more)	V193, V337, V366	lake.house_ptr_ transactions_canonical c JOIN lake.sec_8k_filing_index s ON c.asset_ticker = s.ticker AND c.transaction_date = s.filing_date WHERE Khanna household filter	—
OCC_M015	III.1	Aligned-direction named-officer Form 3/4/5 same-day: 86 household trades same calendar day as same-direction officer filing at the same issuer; chamber rank 3 of 156 (P98).	F345	V365	lake.house_ptr_ transactions_canonical c JOIN lake.sec_form345_full f ON c.asset_ticker = f.issuer_ticker AND c.transaction_date = f.filing_date AND sign(c.amount) = sign(f.shares_traded)	—
OCC_M016	III.1	Pharma × FDA Advisory Committee: 4,595 household pharma trades within ±14d / 1,070 within ±3d; chamber rank 1 of 66 on both windows (6.1× and 6.4× second-place).	F361	V222	lake.house_ptr_ transactions_canonical JOIN lake.v_fda_adcom_meetings_all ON tx within ±N days of meeting; pharma sector filter via ro_khanna.ticker_map	—
OCC_M017	III.1	Pharma × CMS rulemaking: 1,244 household pharma trades within ±14d of discrete CMS rulemaking events; chamber rank 1 of 66 P100, 14× chamber P95.	F343	V220	lake.house_ptr_ transactions_canonical JOIN lake.federal_register_healthcare_rules_v2 ON tx within ±14 days; pharma sector filter	—
OCC_M018	III.1	PAC dependency: 0.019% of 2024-cycle receipts (\$2,000 of \$10.57M); chamber	F328	V432	lake.fec_house_candidate_summary_2024 WHERE cand id='H4CA12055':	—

Claim						
ID	§	Claim summary	Facts	Verif	Substrate	Digest
OCC_M019	III.2	14 defense-prime common-stock trades concentrated on 4 distinct NDAA enactment dates 2017-12-12 / 2021-01-01 / 2021-12-27 / 2023-12-22.	F69, F79, F81, F82, F83, F84, F85, F86 (+12 more)	V145, V200, V201, V208, V209, V210 (+15 more)	lake.house_ptr_transactions_canonical JOIN lake.congress_bill_actions ON tx within ±14 days of NDAA enactment; defense-prime ticker filter (BA, GD, LMT, NOC, RTX, HON, PLTR)	—
OCC_M020	III.2	Khanna voted NAY on 12 of 13 NDAA passage votes 2017-2024 while household accumulated defense-prime stock around enactment dates (public-NAY / private-BUY divergence).	F69, F79, F321	V200, V201, V208, V210, V533	lake.congress_member_votes WHERE member_bioguide_id='K000389' AND bill_number IN (NDAA universe per congress_bills) AND vote_position='Nay'	—
OCC_M021	III.2	Defense-prime sector (356 transactions) midpoint terminal P&L \$10.17M vs SPY benchmark \$4.68M; defense-prime alpha \$5.49M.	—	—	ro_khanna.trade_pnl WHERE sector='defense_prime'; ro_khanna.damages_summary	—
OCC_M022	III.2	Palantir same-day federal-contract × household-trade pairing: 9 calendar days; 2022-05-10 USAF \$18.9M action paired with 6 intra-day DC PLTR trades; 2025-09-19 three-agency \$24.2M cluster (DHS ICE / IRS / HHS) paired...	F54, F63, F67, F92, F314, F315, F348, F653 (+4 more)	V206, V281, V292, V293, V298, V300 (+4 more)	lake.usaspending_contracts_2022 + lake.usaspending_contracts_2025 WHERE recipient_name ILIKE '%PALANTIR%'; lake.house_ptr_transactions_canonical WHERE asset_ticker='PLTR'	—
OCC_M023	III.3	108 household pharma trades clustering ±14d of 14 discrete CMS/HHS/FTC rulemaking events 2017-2024; per-page re-extraction surfaces 185 trades across 14 of 14 catalogued events (no empty windows).	F95, F96, F97, F98, F99, F100, F101, F102 (+100 more)	V73, V504, V505, V506, V507, V508 (+25 more)	lake.house_ptr_transactions_canonical JOIN lake.federal_register_healthcare_rules_v2 WHERE pharma sector filter AND tx_date within ±14d of rulemaking event_date	—
OCC_M024	III.3	August 2024 CMS IRA cluster: single-day 286-tx household rebalance 2024-08-02 (13d before 2024-08-15	F128, F129, F130, F131	V94, V107, V220	lake.house_ptr_transactions_canonical WHERE filer Khanna AND transaction_date='2024-08-02'	—

Claim						
ID	§	Claim summary	Facts	Verif	Substrate	Digest
OCC_M025	III.3	FDA Advisory Committee alignment: 1,070 household pharma-ticker trades within ±3d of FDA AdCom meeting; 4,595 within ±14d; 204 same-day. Khanna chamber rank 1 of 66 on both windows (6.1× and 6.4× second-place); 97% of...	F361, F379, F679, F853	V222, V398, V399	lake.house_ptr_transactions_canonical JOIN lake.v_fda_adcom_meetings_all (847 meetings; 565 within 2017-2026 audit window) WHERE pharma sector	—
OCC_M026	III.3	Pharma sector P&L (12-ticker strict universe): \$3.2M midpoint terminal profit / 1,088 priced tx; broader 20-ticker universe \$4.3M / 1,835 priced tx. Sector-matched alpha (XLV/IBB/VHT) +\$1.8M to +\$2.1M positive; SPY-re...	F820, F833	—	ro_khanna.trade_pnl WHERE sector LIKE 'pharma%'	—
OCC_M027	III.3	Conflict triangle — Nvidia × Select-Committee jurisdiction: TY2024 10,076 NVDA shares (2,821 Ritu + 7,255 Monte/Usha Ahuja Family Trust) donated to Ahuja Charitable Foundation EIN 34-1685088; donation-time FMV \$1,667,...	F203, F209, F316, F317, F427, F429, F475, F734	V311, V442, V445, V467, V531, V617 (+1 more)	lake.irs_990_pf_noncash_donations WHERE ein='341685088' AND tax_year=2024 AND ticker='NVDA'	
OCC_M028	III.3	Goldman Sachs margin scaffold TY2017-TY2019: continuous spouse-owned facility with two concurrent Margin lines per year (TY2017 ~\$750K-\$1.5M; TY2018 \$600K-\$1.25M; TY2019 \$515K-\$1.05M); paired-trust label structure (Ri...	F504, F505, F605, F642, F1142, F1158	V273, V660	ro_khanna.pfd_schedule_d_liabilities WHERE filer Khanna AND creditor ILIKE '%Goldman%' AND tax_year IN (2017,2018,2019,2020)	
OCC_M029	III.3	Spouse-owned XSP (S&P 500 mini-index) PUT-option program: 282 separate transactions across tenure, each amount-banded \$1,001-\$15,000 (premium receipt footprint, not notional); strikes systematically OTM; expiries	F442, F443, F469, F504	—	lake.house_ptr_transactions_canonical WHERE filer Khanna AND asset_name ILIKE '%XSP%' AND transaction_type ILIKE '%PUT%' AND owner='SP'	

Claim						
ID	§	Claim summary	Facts	Verif	Substrate	Digest
OCC_M041	DOJ	Aggregate LD-203 registrant-originated giving 2011-10 through 2025-12: \$299,198 across 147 line items filed by 53 unique LDA registrants under penalty of perjury. Top: AFT \$36K / PG&E \$35K / Teamsters DRIVE \$34K / CWA ...	F500, F899, F1135	V303, V359	lake.lda_contributions WHERE recipient_committee_id='C00503185' AND filing_period_start >= '2011-10-01'	—
OCC_M046	III.5	5 named inbound revolving-door donor-lobbyists: Israel (Commerce → ACG Advocacy / \$1K to Khanna of which \$500 refunded); Siddiqui (Pelosi/Becerra → Akin Gump partner / \$2K); Sanchez (Commerce Under Secretary → Holland...	F68, F264, F265, F266, F267, F270, F273, F409 (+4 more)	V9, V24, V294, V301, V350, V353 (+8 more)	lake.lda_registrants JOIN lake.fec_individual_contributions WHERE recipient_committee_id='C00503185' AND contributor matches 5 lobbyist name patterns; cross-validated against federal-employment history	—
OCC_M047	III.5	Client-employee individual contribution clusters: Israel portfolio \$166,575 across 127 contributions from 10 client firms (Oracle \$65,885 / Microsoft \$52,350 / Qualcomm \$19K / News Corp \$10.5K / Viacom \$8K / VLSI \$5.6...	F268, F270, F273	V353, V360, V404, V412	lake.fec_individual_contributions WHERE recipient_committee_id='C00503185' AND contributor_employer ILIKE patterns matching Israel + Siddiqui client-firm rosters from lake.lda_registrants	—
OCC_M048	III.5	Corporate-PAC control test: zero PAC contributions to Khanna across every identifier checked from 13 principal donor-universe firms (Oracle PAC / Microsoft MSVPAC / Qualcomm QPAC / News Corp PAC / Viacom-Paramount PAC...	F329, F783	V460	lake.fec_committee_contributions WHERE recipient_committee_id='C00503185' AND contributing_committee_id IN (13 corporate PAC IDs)	—
OCC_M049	III.5	LD-203 compliance failure 2-of-5: Israel filed 2023 Mid-Year LD-203 with no_contributions=False listing 3 other contributions but OMITTING the Khanna \$500 contribution within the Jan-Jun reporting window: all 38 Israe	F307, F308	V219, V356	lake.lda_contributions JOIN lake.lda_registrants WHERE registrant_name matches Israel (ACG Advocacy) OR Taylor (RPT Legal Strategies)	—

Claim						
ID	§	Claim summary	Facts	Verif	Substrate	Digest
OCC_M051	III.5	Two-universe baseline on inbound network scope: 60 distinct donor name-keys in Khanna's 2024 cycle individual-contribution universe match ≥1 LDA-registered revolving-door lobbyist; chamber-active rank P84.5 (denominat...	F704	—	lake.fec_individual_contributiens WHERE recipient_committee_id='C00503185' AND contributor matches lake.lda_registrants lobbyist names; computed across both universes	
OCC_M052	III.5	Outbound-pipeline null finding: only ex-Khanna-office staffer in full LDA corpus is Nandini Narayan (joined TC Energy 2024-12-01 as Senior Adviser Federal Government Relations); scan of Khanna's bill-action corpus for...	F411, F706, F707	V574	lake.lda_registrants WHERE prior_employer ILIKE '%Khanna%' OR '%Office of Congressman Khanna%'; cross-checked against lake.congress_bill_actions for Khanna 2024-12 to 2026-04 window	—
OCC_M053	III.5	Tier-2 PFD-derived income-pattern (Count 5): 5 distinct continuing private-sector income streams 2013-2024 (Wilson Sonsini Goodrich & Rosati legal fees / Stanford lecturer / speaking honoraria / book-royalty stream Le...	F460, F483, F484, F510, F512, F513, F647	—	ro_khanna.peer_baseline_percentiles WHERE metric_name='continuing_consulting_speaking'	
OCC_M054	III.6	Ahuja Charitable Foundation EIN 34-1685088 spouse-dual-role: Ritu Ahuja Khanna named trustee continuously TY2018-TY2024 per Foundation's own Form 990-PF officer schedules — 7 consecutive tax years (full e-file 990-PF...	F47, F70, F76, F203, F207, F208, F215, F316 (+45 more)	V72, V155, V164, V171, V213, V311 (+34 more)	lake.irs_990_officers WHERE ein='341685088' AND officer_name ILIKE '%Ritu%Ahuja%Khanna%'; lake.irs_990_contributors WHERE ein='341685088'	—
OCC_M055	III.6	Foundation TY2024 EoY FMV \$45,102,055 across 9 distinct managed investment accounts (primary Goldman Sachs / Fidelity + 8 Fidelity sub-accounts including dedicated covered-calls account + Diamond Hill sleeve). Schedul	F47, F70, F207, F683	V486, V502, V516, V529	lake.irs_990_returns WHERE ein='341685088' AND tax_year=2024; lake.irs_990_pf_noncash_donations WHERE ein='341685088' AND tax_year IN (2022, 2023, 2024)	—

Claim						
ID	§	Claim summary	Facts	Verif	Substrate	Digest
OCC_M057	III.6	Dover Delaware rental-property asymmetric disclosure (4-leg structural): (A) Schedule A asset-side 10-year omission across TY2014-TY2023 (2,524 rows scanned; zero Dover/Delaware/First Bank of Wilmington entries); (B)...	F495, F501, F507, F508, F509, F685, F803, F804 (+1 more)	V68, V346, V623	ro_khanna.pfd_schedule_a_assets + pfd_schedule_d_liabilities + pfd_schedule_b_income WHERE filer Khanna AND tax_year BETWEEN 2014 AND 2023	—
OCC_M058	III.6	Household margin-loan ladder TY2017-TY2020 emerging post-swearing-in: TY2017 Goldman Sachs single liability '\$1M+'; TY2018 Goldman × 2 combined \$265K-\$550K; TY2019 Ritu Ahuja 1994 Trust \$100K-\$250K + Goldman \$250K-\$50...	F503, F504, F505, F605, F642, F1142, F1158	V273, V660	ro_khanna.pfd_schedule_d_liabilities WHERE filer Khanna AND tax_year BETWEEN 2017 AND 2020 AND creditor ILIKE '%Goldman%'	—
OCC_M060	III.6	Donor-employer × household-PTR overlap corroboration: ticker-for-ticker convergence between principal-committee employer-donor cluster and household PTR inventory: Alphabet 265 tx / Microsoft 175 / Adobe 164 / Morgan...	F499	—	lake.fec_individual_contributions JOIN lake.house_ptr_transactions_canonical via contributor_employer + asset_ticker token mapping; Foundation overlay via lake.irs_990_pf_noncash_donations	—
OCC_M061	IV	Aggregate household economic gain Damages Table: notional traded \$11.5M low / \$39.7M mid / \$67.9M high; terminal P&L \$14.6M low / \$61.0M mid / \$107.5M high; SPY baseline \$32.9M; alpha over SPY \$28.2M.	F225	V327, V351	ro_khanna.damages_summary	—
OCC_M062	IV	Window-attributable share: 41.3% of midpoint terminal P&L (\$25.2M) generated by trades placed within ±14 calendar days of NDAA enactment OR CMS rulemaking action OR same-day 8-K filing OR USAspending	F225, F242, F245, F277, F278, F280, F280	V152, V327, V351, V448, V457, V459 (+5 more)	ro_khanna.trade_pnl WHERE event_window_flag=TRUE; ro_khanna.damages_summary	—

Claim						
ID	§	Claim summary	Facts	Verif	Substrate	Digest
OCC_M063	IV	T+30 short-window signal: \$293,646 of \$509,114 household T+30 mark-to-market P&L (57.7%) attributable to event-window trades = 3.4× per-trade ratio between windowed and non-windowed T+30 P&L.	—	—	ro_khanna.trade_pnl WHERE horizon='T+30' GROUP BY event_window_flag	—
OCC_M064	IV	Sector-level alpha attribution (midpoint): Big Tech \$27.6M / Defense Prime \$5.4M / Defense Tech \$0.7M / Pharma -\$2.2M / Healthcare Devices -\$2.9M / Healthcare Services -\$0.3M; sum \$28.16M matches headline.	F820, F833	—	ro_khanna.trade_pnl GROUP BY sector	—
49	OCC_M065	VI	Response #1 SMA-defense rebuttal (Mitigated): no SMA broker / no QBT / no third-party discretionary custodian on 2024 Annual PFD per Tesseract OCR; PTR-side cross-confirmation across 114 PTRs attributes substantially...	F38, F80, F209, F474, F807	V295, V418, V442, V445	ro_khanna.pfd_schedule_a_assets WHERE doc_id='8221318'; ro_khanna.ptr_filing_audit aggregated by account_custodian
	OCC_M066	VI	Response #12 donor-capture rebuttal (Acknowledged + preempted): three diagnostic dimensions show donor-capture pathway absent — (a) PAC dependency 0.019% chamber rank 4/219 P0.5; (b) Form 3L bundler = 1 (JStreetPAC \$25,750); (c) AIPAC/JStreet split = zero AIPAC vs Gottheimer \$452,451 (17.6× opposite).	F327, F328, F329, F333	V131, V144, V432, V460, V462, V478 (+1 more)	lake.fec_committee_disbursements WHERE recipient_committee_id = 'C00503185'; lake.fec_form3l WHERE candidate_id='H4CA12055'; lake.fec_individual_contributions employer ILIKE patterns for AIPAC + JStreet bundling
	OCC_M067	VI	Response #12a MUR 7062 distinguishability (Acknowledged + preempted): Ro For Congress entered Pre-Probable-Cause Conciliation Agreement in MUR 7062 executed 2021-10-26 following 6-0 FEC vote 2021-10-12; co-respondents...	F407	V237, V269	lake.fec_mur WHERE mur_number=7062; FEC public docket

Claim						
ID	§	Claim summary	Facts	Verif	Substrate	Digest
OCC_M069	VI	Response #14 trade-citation OCR-defect rebuttal (Acknowledged + preempted): all 28 specific household transactions cited carry zero extraction-pipeline audit flags; each (a) eyeball-verified against source House Clerk...	F700	—	ro_khanna.cited_trades_3way_validation; ro_khanna.ptr_filing_audit WHERE audit_flag='auditable'; Capitol Trades + QuiverQuant snapshots	
OCC_M070	III.1	5 U.S.C. § 13105(l) STOCK Act §6 PTR 45-day deadline (operative; predecessor 5 U.S.C. App. § 103(l) per P.L. 117-286 § 7 2022-12-27 recodification).	F525	V374, V376	public.v_statute_current WHERE jurisdiction='federal_usc' AND title_number='5' AND section='13105'	—
OCC_M071	III.1	5 U.S.C. § 13106 EIGA civil penalty framework (predecessor 5 U.S.C. App. § 104; \$200/violation minimum; Committee on Ethics waiver authority).	F526, F527, F850	V231, V375, V396	public.v_statute_current WHERE jurisdiction='federal_usc' AND title_number='5' AND section='13106'	—
OCC_M072	III.1	15 U.S.C. § 78u-1(g) STOCK Act §§ 3-4 MNPI extension to Members of Congress (operative; section number unchanged P.L. 117-286 cross-ref conformance only).	F524	V372, V373	public.v_statute_current WHERE jurisdiction='federal_usc' AND title_number='15' AND section='78u-1'	—
OCC_M073	III.6	5 U.S.C. § 13104(d)(1)(A) spouse-asset disclosure scope (operative; predecessor 5 U.S.C. App. § 102(d)(1)(A)).	F526, F850	V231, V396	public.v_statute_current WHERE jurisdiction='federal_usc' AND title_number='5' AND section='13104'	—
OCC_M074	III.4	11 C.F.R. § 109.21 coordinated communications test (3-prong: payment-source + content + conduct).	F580	V169, V240, V247, V248	public.v_statute_current WHERE jurisdiction='federal_cfr' AND title_number='11' AND section='109.21'	—
OCC_M075	III.4	52 U.S.C. § 30116(a)(7)(B)(i) FECA contribution limits applicable to coordinated communications.	F530	V165, V173, V242, V243	public.v_statute_current WHERE jurisdiction='federal_usc' AND title_number='52' AND section='30116'	—

Claim						
ID	§	Claim summary	Facts	Verif	Substrate	Digest
OCC_M077	III.5	18 U.S.C. § 207 post-employment restrictions on federal executive-branch officials (subsections (a)(1) lifetime / (a)(2) 2-yr / (b) 1-yr senior / (c) 1-yr designated-component / (e) 1-yr legislative-staff / (f) 1-yr f...	F528	—	public.v_statute_current WHERE jurisdiction='federal_usc' AND title_number='18' AND section='207'	—
OCC_M078	III.1	House Rule XXIII Code of Official Conduct (cl. 1 conduct reflecting creditably; cl. 2 prohibition on use of official position for personal gain; cl. 9 acceptance thresholds for contributions from registered lobbyists).	F529, F577	V380	public.v_statute_current WHERE jurisdiction='house_rules' AND section ILIKE '%XXIII%'	—
51	OCC_M079	VII Exhibit catalog: 30+ lettered exhibits A-JJ + MNPI + REVOLVING_DOOR; OCC_EXHIBIT_LIST.md governs cross-reference in event of conflict; §VII summary table cross-references each exhibit letter to its file path (absolute...	—	—	outputs/leads/exhibit_packets/ro_khanna_political_dossier/EXHIBIT_*.md + OCC_FILING_PACKAGE_V2/OCC_EXHIBIT_LIST.md cross-reference	—
OCC_M080	METHODOLOGY	METHODOLOGY footer: substrates enumerated (House Clerk PTR / PFD via Gemini per-page + canonical view; FEC Forms 3/3X/5/24/3L/1 + Schedule E via bulk-data; Senate LDA bulk XML + LD-203; FARA.gov; IRS 990-PF e-file cor...	—	—	outputs/leads/exhibit_packets/ro_khanna_political_dossier/OCC_FILING_PACKAGE_V2/OCC_COMPLAINT_KHANNA.md \$METHODOLOGY footer	—

### A.1 What the index does and does not assert

Each row is a pointer, not a re-pleading. The body of this Complaint carries the operative legal characterization of the conduct under 5 U.S.C. §§ 13105(l) and 13106 (Ethics in Government Act, as recodified by Pub. L. 117-286 § 7); 15 U.S.C. § 78u-1(g) (STOCK Act §§ 3-4 MNPI extension); 5 U.S.C. § 13104(d)(1)(A) (spouse-asset disclosure scope); 11 C.F.R. § 109.21 (coordinated-communications test); 18 U.S.C. § 207 (post-employment restrictions); House Rule XXIII (Code of Official Conduct) and the related statutory and regulatory citations at § 1 above. The Appendix exists so that, on the Office's preliminary review, every substantive claim in the body resolves to (a) a canonical record in the Complainant's fact store, (b) an independent verification trail of that record against the underlying public-record substrate, and (c) a digest-anchored query the reviewing body's staff can re-execute against the cited public-record source to reproduce the substrate row state. The Appendix does not enlarge the body's pleading scope; it documents the provenance of what is already pleaded.

### A.2 Manifest co-distribution

The full machine-readable manifest, including each claim's complete normalized SQL text, the analytical *what-means/what-shows* annotations, the theory-and-element tagging, and the un-truncated fact and verification ID lists, lives at `_provenance_index_occ.json` adjacent to this filing in the dossier directory. The JSON file is the source of truth; the table above is its human-readable rendering. A drift-check script (`scripts/k_provenance_drift_check.py`) verifies that the rendered table and the JSON manifest remain row-for-row consistent and that every cited fact and verification ID resolves in the live `ro_khanna.v3_facts` and `ro_khanna.v3_fact_verifications` tables at the run timestamp.

## METHODOLOGY

**Substrate.** Every numerical assertion in this Complaint traces to a primary-source record retained in the undersigned's evidentiary database and to an archival copy cited in the accompanying Exhibit List. The operative substrates are: House Clerk Periodic Transaction Reports and Annual Personal Financial Disclosures (on-line filings via the House Clerk Financial Disclosure portal, re-OCR'd per-page via Gemini flash-lite-preview and cross-validated against a canonical transaction-grain amendment-cascade-deduplicated view); Federal Election Commission Forms 3, 3X, 5, 24, 3L, 1, and Schedule E bulk disclosures (via the Commission's bulk-data index); Lobbying Disclosure Act quarterly filings and LD-203 semi-annual lobbyist contribution reports (via the Senate LDA bulk XML and the House Clerk LDA portal); Foreign Agents Registration Act registrations and supplemental statements (via FARA.gov); Internal Revenue Service Form 990-PF filings (via the authoritative e-file corpus); House Clerk roll-call vote records and Congressional bill-action records; U.S. Treasury USAspending prime-contract action records; published Centers for Medicare and Med-

icaid Services rulemaking actions; Food and Drug Administration Advisory Committee meeting calendars; Securities and Exchange Commission Form 8-K, Form 4, and Form 5 filings; California Secretary of State Cal-Access Form 497 late-contribution filings; and San Francisco Ethics Commission campaign-finance disclosures. Scraper fall-backs (Wayback Machine, bulk-data mirrors) are used only where a primary-source index is transiently unreachable, and in those cases the operative cite remains to the primary source.

**Dedup.** PTR transactions are analyzed at earliest-disclosure-filing grain via a canonical transaction-key view; amendment re-reports are collapsed to a single canonical transaction so that documentary-violation severity is attributed to the earliest filing and not inflated by subsequent amendments.

**Composite score.** The Count 1 composite metric is defined as  $\text{dollar\_weighted\_midpoint\_late} \times (\text{worst\_days\_late} / 365) \times \ln(1 + \text{n\_tx\_late})$  across the household's late-filed Periodic Transaction Reports. The same composite is computed across every House Member with at least twenty auditable transactions for the chamber baseline, and across the active-trader peer cohort for the peer-cohort baseline.

**Statute currency.** Every operative statutory citation in this Complaint is the current-codification form. Ethics in Government Act references are cited at 5 U.S.C. §§ 13101–13111 per Pub. L. 117-286 § 7 (Dec. 27, 2022); the predecessor 5 U.S.C. App. § 10X form appears only where the cited conduct predates the 2022 recodification and the reader benefits from a predecessor-cite parenthetical. The supervising ethics office is referred to operatively as the Office of Congressional Conduct, the current name of the office established by H. Res. 5, 119th Cong. (Jan. 3, 2025).

*End of Complaint.*