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IN THE MATTER OF ALLEGATIONS RELATING TO REPRESENTATIVE MIKE COLLINS

R E P O R T

OF THE

COMMITTEE ON ETHICS



November 23, 2026.—Referred to the House Calendar and ordered to be printed

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119TH CONGRESS, 2D SESSION
U.S. HOUSE OF REPRESENTATIVES
COMMITTEE ON ETHICS

IN THE MATTER OF ALLEGATIONS RELATING TO REPRESENTATIVE MIKE COLLINS

November 23, 2026

Mr. GUEST from the Committee on Ethics, submitted the following

REPORT

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COMMITTEE ON ETHICS

Thomas A. Rust
Staff Director and Chief Counsel

Jordan Downs
Chief of Staff to the Chairman

David Arrojo
Counsel to the Ranking Member

1015 Longworth House Office Building
Washington, D.C. 20515–6328
Telephone: (202) 225–7103
https://Ethics.House.gov

LETTER OF TRANSMITTAL

November 23, 2026

The Honorable Kevin F. McCumber
Clerk, House of Representatives
H-154, The Capitol
Washington, DC 20515

Dear Mr. McCumber:

Pursuant to clauses 3(a)(2) and 3(b) of Rule XI of the Rules of the House of Representatives, we herewith transmit the attached report, "In the Matter of Allegations Relating to Representative Mike Collins."

Sincerely,

Michael Guest
Chairman

Mark DeSaulnier
Ranking Member

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119TH CONGRESS, 2D SESSION
U.S. HOUSE OF REPRESENTATIVES
COMMITTEE ON ETHICS

IN THE MATTER OF ALLEGATIONS RELATING TO REPRESENTATIVE MIKE COLLINS

NOVEMBER 19, 2026

Mr. GUEST, from the Committee on Ethics, submitted the following

R E P O R T

In accordance with House Rule XI, clauses 3(a)(2) and 3(b), the Committee on Ethics (Committee) hereby submits the following Report to the House of Representatives:

I. INTRODUCTION

On October 7, 2025, the Office of Congressional Conduct (OCC) transmitted a Report and Findings (Referral) regarding allegations that Representative Mike Collins may have: used congressional resources for unofficial or otherwise unauthorized purposes; retained an employee who did not perform duties commensurate with the compensation the employee received; and discriminated unfairly by dispensing special favors or privileges by retaining an employee with whom his then-Chief of Staff, Brandon Phillips, had a personal relationship.[1] The OCC Referral also included allegations concerning Mr. Phillips' use of the Members' Representational Allowance (MRA) for unofficial or otherwise unauthorized purposes, but "was not able to reach a determination at this time" due to a lack of cooperation from Representative Collins and Mr. Phillips.[2] OCC separately transmitted a Report and Findings concerning Mr. Phillips, with similar allegations. On May 5, 2026, Mr. Phillips' employment was terminated and the Committee lost jurisdiction over Mr. Phillips as a subject of its review but retained jurisdiction over the underlying allegations as they related to Representative Collins.

The Committee reviewed the allegations referred by OCC pursuant to Committee Rule 18(a). Representative Collins cooperated with the Committee's investigation. Mr. Phillips did not cooperate and evaded subpoena service on numerous occasions, including three attempts by the U.S. Marshals Service. The Committee voted to hold him in contempt of Congress after he failed to respond to a testimonial subpoena.

The Committee found that Representative Collins' congressional office had an improper employment relationship with Witness 1, impermissibly paying her $10,000 as an "intern" for 16

[1] Report and Findings from the Office of Congressional Conduct (Review No. 25-7636) (Appendix A) (hereinafter OCC Referral).
[2] *Id*.

weeks on the payroll in 2023 and 2024, while accepting voluntary communications services from her over several years. The Committee did not find evidence that Representative Collins was directly involved in the hiring of Witness 1 or the use of her services for official purposes but did find that Representative Collins did not exercise sufficient oversight over Mr. Phillips, both in connection with Witness 1's employment relationship and with Mr. Phillips' receipt of reimbursements from the MRA that may not have been connected to permissible official expenses. However, the Committee also noted that the use of official funds for Witness 1's salary and Mr. Phillips' reimbursements were approved through normal channels.

Members of Congress are ultimately responsible for how official resources are used by their office. Following discussions, the Committee and Representative Collins mutually resolved the concerns regarding Witness 1's compensation with appropriate repayment. On November 19, 2026, the Committee voted to issue this Report and consider the matter closed.

II. PROCEDURAL HISTORY

OCC undertook a preliminary review of this matter on May 22, 2025. On June 21, 2025, OCC initiated a second-phase review of this matter. The Committee received the OCC Referral on October 7, 2025. On November 21, 2025, the Chairman and Ranking Member of the Committee issued a statement announcing that they had jointly decided to extend the Committee's consideration of the OCC Referral regarding Representative Collins for an additional 45-day period. Representative Collins submitted a written response to the OCC Referral through his attorney on January 2, 2026. On January 5, 2026, pursuant to House and Committee rules, the Committee publicly released the OCC Referral, along with a copy of Representative Collins' written response.

Also on October 7, 2025, the Committee received a referral concerning Mr. Phillips, Representative Collins' former Chief of Staff.[3] OCC's referral concerning Mr. Phillips related to allegations that Mr. Phillips may have: used congressional resources for unofficial or otherwise unauthorized purposes and discriminated unfairly by dispensing special favors or privileges by retaining an employee with whom he had a personal relationship. On November 21, 2025, the Chairman and Ranking Member of the Committee issued a statement announcing that they had jointly decided to extend the Committee's consideration of the OCC Referral regarding Mr. Phillips for an additional 45-day period. Mr. Phillips submitted a written response to the OCC Referral through his attorney on January 2, 2026.[4] On May 5, 2026, Mr. Phillips' employment was terminated and the Committee lost jurisdiction over the referral for which Mr. Phillips was the subject.

The Committee reviewed materials provided by OCC, including its Report and Findings, along with other documentary and testimonial evidence obtained by OCC. In addition, the Committee requested information from Representative Collins, who voluntarily provided documents to the Committee, as well as from Brandon Phillips and Witness 1. Mr. Phillips initially provided limited responses to these requests through his attorney and then ceased correspondence with the Committee. In total, Committee staff reviewed over 1,000 documents, including

[3] Report and Findings from the Office of Congressional Conduct (Review No. 25-7735) (Appendix B).
[4] Mr. Phillips' written response was a joint submission with Representative Collins.

Representative Collins' submissions and the other documents described above. The Committee issued testimonial subpoenas to Brandon Phillips and Witness 1 (who also received a subpoena for documents) and conducted three voluntary witness interviews. Witness 1 ultimately cooperated with both subpoenas. Mr. Phillips evaded service of a subpoena, failed to appear for his deposition, and ignored multiple warnings by the Committee that he could be held in contempt of Congress; on November 19, 2026, the Committee voted to refer him to the full House for consideration of contempt proceedings.

On November 19, 2026, the Committee voted to adopt this Report with respect to Representative Collins.

III. RELEVANT LAWS, RULES, AND OTHER APPLICABLE STANDARDS OF CONDUCT

A. Code of Official Conduct

Federal law requires that appropriations "shall be applied only to the objects for which the appropriations were made."[5] House Rule XXIII, clause 8, states that "[a] Member . . . or officer of the House may not retain an employee who does not perform duties for the offices of the employing authority commensurate with the compensation such employee receives."[6] The Code of Ethics for Government Service further instructs every employee to "[g]ive a full day's labor for a full day's pay,"[7] and Committee on House Administration (CHA) regulations require employing Members to submit monthly salary certifications for their staff to ensure compliance with applicable regulations.[8]

House Rule XXIII, clause 8 aims to prevent fraud or misuse of the House payroll, particularly the use of "ghost employee" schemes. In such schemes, an employee is recorded on the payroll but does not perform official work equivalent to the earnings he or she collects. The "ghost employee" may be a real individual, or a fictitious person who is misrepresented on payroll records as a *bona fide* employee, whose wage or salary payments are then used for some impermissible purpose.[9]

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[5] 31 U.S.C. § 1301(a) ("appropriations shall be applied only to the objects for which the appropriations were made except as otherwise provided by law"). *See also House Ethics Manual* at 20 (2022) (hereinafter *Ethics Manual*).

[6] Violations of House Rule XXIII, clause 8 may also implicate Federal laws, including 18 U.S.C. § 371 (criminal conspiracy) and 18 U.S.C. § 641 (embezzlement). *See, e.g.*, Comm. on Standards of Official Conduct, *Summary of Activities, One Hundredth Congress*, H. Rept. 100-1125, 100th Cong., 2d Sess. 15-16 (*In the Matter of Delegate Fofo I.F. Sunia and Matthew K. Iuli*); *United States v. Rostenkowski*, No. 94-226 (D.D.C. 1995) (Representative Rostenkowski was charged with, *inter alia*, mail/wire fraud (18 U.S.C. §§ 1341, 1343, 1346) and embezzlement of public funds (18 U.S.C. § 641). He pled guilty to the mail fraud charges).

[7] Code of Ethics for Government Service ¶ 3.

[8] Committee on House Administration, *Members' Congressional Handbook* (updated Sept. 12, 2025) (hereinafter *Members' Handbook*) at 17. *See also Ethics Manual* at 287.

[9] *See United States v. Robinson*, 903 F. Supp. 2d 766, 791 (E.D. Mo. 2012) ("[A]n employee who receives salary money for time in which he did not work or perform services is a 'ghost' employee who is not receiving bona fide salary or wages"); *United States v. Harloff*, 815 F. Supp. 618, 619 (W.D.N.Y. 1993) (citing *United States v. Stout*, 1990 U.S. Dist. LEXIS 12343 (E.D. Pa. 1990)) (noting that 18 U.S.C. § 666(c) authorizes prosecution based on "ghost employees," or situations in which an employee "invents fictitious workers and collects their 'wages' for his/her own use").

Consistent with the animating purpose of House Rule XXIII, clause 8, and its predecessor, former Rule XLIII, clause 8, the Committee has historically found violations of the "ghost employee" rule in cases where official funds—originally disbursed as staff compensation—have been knowingly converted for personal financial benefit or other unauthorized use.[10] The Committee has also found violations of the "ghost employee" rule where a Member obtained a financial, campaign, or other private benefit from the misuse of official funds appropriated for staff compensation, but the Member retained and paid an employee despite knowing the employee was not physically present to perform official work.[11]

Subject to these restrictions, the "general terms, conditions, and specific duties of House employees traditionally have been within the discretion of the employing Member."[12] Accordingly, while a staffer is instructed to "give a full day's labor for a full day's pay," the employing Member may dictate what a "full day's labor" consists of.

Clauses 1 and 2 of the Code of Official Conduct (House Rule XXIII) provide that a Member "shall behave at all times in a manner that shall reflect creditably on the House," and "shall adhere to the spirit and the letter of the Rules of the House." In enforcing clause 1, the Committee has noted that "[c]lause 1 is a purposely subjective standard designed to 'have a deterrent effect against improper conduct,' and to provide 'the ability to deal with any given act or accumulation of acts which, in the judgment of the [C]ommittee, are severe enough to reflect discredit on the Congress.'"[13] The provision serves "as a safeguard for the House as a whole."[14]

The Committee has also noted that the standards of conduct governing the ethical behavior of the House community must be read to prohibit violations not only of the letter of the rules, but of the spirit of the rules, under House Rule XXIII, clause 2. The standard "provide[s] the House the means to deal with infractions that rise to trouble it without burdening it with defining specific

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[10] Before the permanent Committee on Standards of Official Conduct was created in 1967, and before the existence of either Rule XXIII, clause 8, or Rule XLIII, clause 8, various subcommittees of the House investigated Representative Adam Clayton Powell, Jr. for expenditures he made as chairman of the Committee on Education and Labor, including salary payments he made to his wife over more than two years, even though she performed no official duties during that time. In the 90th and 91st Congresses, Representative Powell was removed from his chairmanship and fined, and an attempt was made to exclude him from the House. *See* Select Comm. Pursuant to H. Res. 1, *In re Adam Clayton Powell,* H. Rept. 90-27, 90th Cong. 1st Sess. 19-20, 31-32 (1967) (hereinafter *Powell*). *See also Ethics Manual* at 5; Comm. on Standards of Official Conduct, *In the Matter of Representative Barbara Rose Collins*, H. Rept. 104-876, 104th Cong. 2d Sess. 35 (1997) (hereinafter *Rose Collins*); Comm. on Standards of Official Conduct, *In the Matter of Representative Charles H. Wilson*, H. Rept. 96-930, 96th Cong. 2d. Sess. 2 (1980) (hereinafter *Wilson*); Comm. on Standards of Official Conduct, *In the Matter of Representative Charles H. Diggs, Jr.*, H. Rept. 96-351, 96th Cong. 1st Sess. 5-6, 44 (1979) (hereinafter *Diggs*).

[11] Comm. on Standards of Official Conduct, *In the Matter of Representative Austin J. Murphy*, H. Rept. 100-485, 100th Cong., 1st Sess. 5 (1987) (hereinafter *Murphy*); Comm. on Ethics, *In the Matter of Representative Mark Meadows*, H. Rept. 115-1042, 115th Cong. 2d Sess. (2018) (hereinafter *Meadows*).

[12] *Ethics Manual* at 277; *see also Members' Handbook* at 7 ("each Member . . . determines the terms and conditions of employment and service for their staff.")

[13] Comm. on Ethics, *In the Matter of Allegations Relating to Representative Matt Gaetz*, H. Rept. 116-479, 116th Cong. 2d Sess. 17 (2020) (quoting *House Ethics Manual* (2008) at 13 (citing 114 Cong. Rec. 8778 (Apr. 3, 1968)).

[14] Comm. on Standards of Official Conduct, *Inquiry into the Operation of the Bank of the Sergeant-At-Arms of the House of Representatives*, H. Rept. 102-452, 102d Cong. 2d Sess. 22 (1992) (citing Comm. on Standards of Official Conduct, H. Rept. 90-1176, 90th Cong., 2d Sess. 17 (1968)).

charges that would be difficult to state with precision."[15] The practical effect of clause 2 is to allow the Committee to construe the ethical rules broadly and prohibit Members from doing indirectly what they would be barred from doing directly. The *Ethics Manual* states that "a narrow technical reading of a House [R]ule should not overcome its 'spirit' and the intent of the House in adopting that and other rules of conduct."[16] Similarly, the Committee has found that conduct that does not strictly meet each of the elements of a federal statute or House Rule may nonetheless violate the Code of Official Conduct.[17]

B. Laws and House Regulations relating to Paid Interns

Member offices may appoint up to four employees that are classified as either paid interns, part-time employees, shared employees, temporary employees, or employees on leave without pay status.[18] Separately, Members may employ interns paid from the House Paid Internship Program (HPIP), an annual appropriation separate from the MRA.[19] Interns employed under the program do not count against the Member's employee ceiling.[20] However, those interns are "subject to the same federal laws and regulations, House Rules, House regulations, and Ethics regulations as interns who may be paid with MRA funds."[21]

Paid interns "must perform services for the Member on a temporary basis as part of an educational plan," and their rate of pay must be more than $1,200.00 and less than $38,500.00 annually.[22] The *Members' Handbook* further provides that "[p]aid interns are ineligible to telework unless an office, as part of its continuity of operations plan, requires employees to telework due to a disaster (natural or man-made), pandemic, or another emergency."[23] In contrast, temporary employees, who must be paid from the MRA, "are employed for a specific purpose or task for not more than 90 calendar days in a 12-month period."[24] Temporary employees are not subject to the same restrictions and requirements as paid interns.

C. Laws and House Rules and Regulations Relating to Voluntary Services

31 U.S.C. § 1342 provides, "[a]n officer or employee of the United States Government or of the District of Columbia government may not accept voluntary services for either government or employ personal services exceeding that authorized by law except for emergencies involving the safety of human life or the protection of property."

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[15] 114 Cong. Rec. 8778 (Apr. 3, 1968) (Statement of Representative Price).
[16] *Ethics Manual* at 16-17 (citing House Select Comm. On Ethics, *Advisory Opinion No. 4*, H. Rept. 95-1837, 95th Cong. 2d Sess. 62 (1979)).
[17] *See* Comm. on Ethics, *In the Matter of Allegations Relating to Representative Ruben Kihuen*, H. Rept. 115-1041, 115th Cong. 2d Sess. (2018) (noting that conduct that may not meet the technical requirements of applicable sexual harassment laws may nevertheless be a violation of the Code of Official Conduct).
[18] *Members' Handbook* at 8.
[19] 2 U.S.C. § 5322a. In the 118th Congress, the maximum internship allowance for an office to use annually was capped at $46,800 per Member office. *See* Public Law 118-47 (Mar. 23, 2024).
[20] *Members' Handbook* at 9.
[21] *Id.*
[22] *Id.* at 8.
[23] *Id*. at 8-9.
[24] *Id.* at 9-10.

House Rule XXIV, clause 1(a) provides, "[a] Member . . . may not maintain, or have maintained for the use of such individual, an unofficial office account."[25] This applies to accounts maintained by third parties for a Member's benefit, even if they are not maintained for the Member's direct use. It also applies to any process whereby funds are received or expended regardless of whether an actual account or repository is maintained. Therefore, the rule prohibits private, in-kind contributions of goods or services for official purposes, with limited exceptions.

There is a general exception to the prohibition against acceptance of services for services provided by intern, fellowship, or similar educational programs "that are primarily of educational benefit to the individual, as opposed to primarily benefiting the Member or office, and which do not give undue advantage to special interest groups."[26] A Member or House office may accept the temporary services of a volunteer provided that the Member of office has a clearly defined program to assure that: (1) The voluntary service is of significant educational benefit to the participant; and (2) such voluntary assistance does not supplant the normal and regular duties of paid employees.[27]

D. Additional Laws and House Rules and Regulations Relating to Official Appropriations

The "Purpose Law" codified in Title 31 of the United States Code, section 1301(a), states that "[a]ppropriations shall be applied only to the objects for which the appropriations were made except as otherwise provided by law."

Regulations from CHA provide that House funds and resources are to be used for official House business and may not be used for any unofficial purposes. The *Members' Congressional Handbook* (*Members' Handbook*) states that, "[o]nly expenses, the primary purpose of which [is] official and representational," are reimbursable from the MRA.[28] Furthermore, "[e]ach Member is personally responsible for the payments of any official and representational expenses incurred that exceed the provided MRA or that are incurred but are not reimbursable under" House regulations.[29]

As explained by the *House Ethics Manual* (*Ethics Manual*), "official resources of the House must . . . be used for the performance of official business of the House, and hence those resources may **not** be used for campaign or political purposes."[30] The *Ethics Manual* also explains that the term "official resources" includes funds appropriated for Member offices as well as the goods and services purchased with those funds, including congressional staff time.[31] Thus, MRA funds, and by extension, the resources for which they are used (including official staff and electronic platforms), may not be used for campaign, personal, or other unofficial purposes. The

[25] *See also Ethics Manual* at 294 ("[I]n addition to money, the prohibition on unofficial office accounts proscribes the private, in-kind contribution of goods or services for official purposes.").
[26] *Id.*
[27] *Id*.
[28] *Members' Handbook* at 5. The *Members' Handbook* similarly states that the MRA is to be used to pay "Ordinary and necessary expenses incurred by the Member or the Member's employees . . . in support of the conduct of the Member's official and representational duties to the district from which he or she is elected." *Id*. at 4.
[29] *Id*. at 6.
[30] *See Ethics Manual* at 133 (emphasis in original).
[31] *Id*.

Committee has explained that a Member is responsible for ensuring that resources provided for support of the official duties are applied to the proper purposes.[32]

Member and staff travel may be paid with official funds if the primary purpose of the trip is the conduct of official business. As a general matter, a Member or staff person, while on official travel, may engage in incidental campaign or political activity, provided that no additional travel expenses are incurred as a result. However, when the primary purpose of trip is in fact the conduct of campaign or political activity, then the travel expenses must be paid with campaign funds and cannot be paid with official funds. The *Members' Handbook* states:

> Ordinary and necessary expenses incurred by the Member, the Member's employees, and in limited circumstances, vendors, while on official travel including transportation, lodging, meals (excluding alcohol), fees (e.g., parking, tolls, ticket change fees, travel insurance, etc.), and incidental expenses are reimbursable.
>
> Official travel includes local travel and travel away from home overnight to conduct official and representational duties, within the United States and its territories and possessions, when returning to the duty station or residence is impractical. . . .
>
> An employee's primary duty station is either the employing Member's district or Washington, D.C., which is determined by the employee's primary residence. . . .
>
> Official travel must originate and terminate in either Washington, D.C., the Member's District, or another location of official business except where otherwise stipulated in the Handbook.[33]

A provision of the *Members' Handbook* permits incidental personal use of House resources when the use is negligible in "nature, frequency, time consumed, and expense."[34] However, this only applies to incidental personal use, not for campaign or political purposes.[35] The *Ethics Manual* provides limited exceptions to the prohibition on using official resources for particular campaign or political-related activities, including coordination of the Member's schedule between the congressional office scheduler and the campaign, or a press secretary in a congressional office answering political questions during an interview that are incidental to an interview focused on official activities.[36] Other than these very specific exceptions,[37] there is no incidental exception for using official resources for campaign or political purposes.

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[32] *See id*. at 332.
[33] *Members' Handbook* at 41-42.
[34] *Id*. at 6-7*; Ethics Manual* at 135-36.
[35] *Ethics Manual* at 136.
[36] *Id*. at 142.
[37] The remaining campaign-related activities that may take place in congressional office or using official time are: (1) referrals to the campaign office, (2) providing published materials to the campaign, (3) responding to questionnaires on legislative issues, and (4) providing nonpartisan voter registration materials. *See id*. at 143-45.

Although officially-connected travel is generally reimbursable from official funds, under CHA regulations, "living and commuting expenses" are not reimbursable except in extraordinary circumstances (such as extreme weather conditions), and when specifically authorized by the Member or CHA.[38] "Living expenses" is defined to include "meals, housing, and other personal expenses incurred at the Member's or employee's primary residence or primary duty station," and "commuting expenses" is defined to include "transportation expenses incurred by the Member or employee while commuting between their residence and duty station."[39] The Committee has also previously noted that "[t]he precept that appropriated funds cannot be used to pay for the costs of employees commuting to their duty station is fundamental across the federal government."[40]

IV. FACTUAL BACKGROUND

Representative Collins has represented the 10th District of Georgia since 2023. Mr. Phillips served as his Chief of Staff from January 3, 2023, through January 2, 2026, then as a part-time senior policy advisor until May 5, 2026, when his employment was terminated.

In September 2021, prior to his election to Congress, Representative Collins and Mr. Phillips attended an event in Georgia where they met Witness 1, who began dating Mr. Phillips within the following year.[41] Mr. Phillips and Witness 1 remained romantically involved through approximately May 2026.[42]

A. Allegations Related to Witness 1

Representative Collins' congressional offices in Washington, D.C. and his district both retain interns pursuant to the House's internship program. House disbursement records show that interns hired in Representative Collins' D.C. office are typically paid from the House's intern allowance, while interns in the district office are typically unpaid.[43] However, from November 4, 2023, through December 31, 2023, and again from October 7, 2024, to December 5, 2024, Witness 1 – a woman who was engaged in a romantic relationship with Representative Collins' then-Chief of Staff, Brandon Phillips – was paid a total of $10,288.44 as a "district intern."[44]

In explaining the general internship process for the district office, Representative Collins' staffers stated interns were required to submit an application, were hired by the Deputy District Director, came to the office to work in person, typically were college students or recent graduates, and were unpaid.[45] Representative Collins' Employee Handbook states, "The Deputy Chief of

[38] *Members' Handbook* at 41-42.
[39] *Id.*
[40] Comm. on Ethics, *In the Matter of Allegations Relating to Representative Cathy McMorris Rodgers*, H. Rept. 116-359, 116th Cong. 1st Sess. 19 (2019) (citing GENERAL ACCOUNTABILITY OFFICE, PRINCIPLES OF FEDERAL APPROPRIATIONS LAW, at 3–33) (hereinafter *McMorris Rodgers*).
[41] 18(a) Deposition of Witness 1.
[42] *Id*.
[43] *See generally* U.S. House of Representatives, Statement of Disbursements (hereinafter SOD Website), https://www.house.gov/the-house-explained/open-government/statement-of-disbursements.
[44] *See* Statement of Disbursements of the House, October 1, 2023 to December 31, 2023 at 727 (hereinafter Q4 2023 SOD); Statement of Disbursements of the House, October 1, 2024 to December 31, 2024 at 766.
[45] OCC Referral ¶¶ 55-62. In contrast, D.C. interns tended to be paid and were not always college students or recent graduates. *Id*.

Staff will manage the intern program" and that "[d]aily tasks and responsibilities [for interns] will be coordinated with the interns [sic] 'site manager.'"[46] The district office maintained a list of interns from 2023 to 2024; Witness 1 does not appear on that list.[47]

In response to the OCC Referral, counsel to Representative Collins asserted that Witness 1 was, "if anything, underpaid," and stated, "this temporary hiring was permissible, proper, above board, and done to assist the Office in serving the interests of the District."[48] Counsel's response further claimed that hiring Witness 1 was "within [Mr. Phillips'] discretion in managing the Congressman's office" and that she "provided valuable assistance with digital and social media projects commensurate with her role with the Office."[49]

1. *"Internship" Periods*

In 2018, the House established an allowance for the compensation of interns, separate from the MRA and effective for the following Fiscal Year, under the HPIP.[50] Representative Collins has consistently made use of the allowance since joining Congress in 2023.

Witness 1 was paid under the House's internship allowance for two separate "internships" in Representative Collins' congressional office: (i) from November 4, 2023, through December 31, 2023, for which she was paid $5,044.00; and (ii) October 7, 2024, through December 5, 2024, for which she was paid $5,244.44. During the internships, Witness 1 maintained full-time employment as an analyst at a telecommunications company.

On October 30, 2023, Mr. Phillips emailed the Financial Administrator for the congressional office, "Please set [Witness 1] up to start as intern first possible day this week, 1,800 [a month]."[51] Witness 1 testified that she did not submit an application nor did she interview with anyone for the internship.[52]

Witness 1 testified that she was brought on during the 2023 "internship" period to "help out with the vice chair race and to assist with content strategy."[53] During Representative Collins' leadership race, Witness 1 spent approximately two weeks in D.C., during which she "[m]ade deliveries to different congressional offices, stuffed envelopes, [and] answered questions from the rest of the staff about scheduling for the week for race activities."[54] Witness 1 was also involved in "writing copy" and "graphic creation" for posts on X and Instagram during and outside the periods of time she was employed as a "district intern."[55] Witness 1 estimated she would spend approximately 5 hours per week on work related to social media content for the congressional

[46] OCC Exhibit 4.
[47] OCC Exhibit 3.
[48] Letter from Counsel to Representative Mike Collins to Committee on Ethics Staff Director and Chief Counsel (Dec. 31, 2025) (Appendix C) (hereinafter Representative Collins' OCC Response).
[49] Representative Collins' OCC Response.
[50] Public Law 115-244 (Sept. 21, 2018).
[51] Exhibit 1.
[52] 18(a) Deposition of Witness 1.
[53] *Id*.
[54] *Id*. The Committee did not receive any documentary evidence of Witness 1's involvement with the leadership race.
[55] *Id*.

office.[56] She reported to and received assignments from Mr. Phillips.[57] She indicated that the 2024 "internship" period involved a continuation of her "content creation" services, but was "not sure" why she was designated as an intern for a small portion of 2024 despite performing those services for several other months that year.[58]

Two former staffers in Representative Collins' district office, including the former District Director, stated that Witness 1 did not work in the district office at any point.[59] Likewise, several staffers in the D.C. office stated Witness 1 was not an intern in that office.[60] However, a handful of D.C. staffers recalled Witness 1 assisting with leadership race materials.[61] The then-Deputy Chief of Staff stated that Mr. Phillips informed him Witness 1 was "helping [staff] out with some communication stuff, [] social media content" and another staffer also stated she had heard Witness 1 was "helping with social media" but that Mr. Phillips "very much controls social media."[62]

Other than for the 2023 leadership race, Witness 1's work was performed entirely remotely and she did not participate in any education programs during either internship.[63] The Financial Administrator testified that he asked Mr. Phillips whether Witness 1 was working remotely during her second internship "[b]ecause [a district staffer] called me and said, Hey, I think [Witness 1] is Brandon's girlfriend, and I don't think she's working."[64] At that time, he informed Mr. Phillips that interns "cannot telework," and stated Mr. Phillips' response was essentially, "That's my bad."[65] The Financial Administrator recommended terminating her internship immediately, but Mr. Phillips said no, and that "if anybody asks, I'll apologize."[66]

Representative Collins informed the Committee that he was aware of Witness 1's employment as an intern in the district office, "but Mr. Phillips was responsible for supervising her, overseeing her work, and handling her compensation."[67]

Over the course of the internship from November 4 through December 31, 2023, Witness 1 received a total of $5,044.00 and from October 7 through December 5, 2024, she received a total of $5,244.44. With respect to the salary for her first internship, the Financial Administrator testified that Mr. Phillips asked him how much was left in the HPIP budget, and said, "just max her out on the salary for the rest of December [from HPIP funds]."[68] No interns employed at that

[56] *Id*.
[57] *Id*.; OCC Referral ¶ 66.
[58] 18(a) Deposition of Witness 1.
[59] *See, e.g.*, OCC Referral ¶¶ 41-42, 53 (a senior staffer testified, "[w]e determined that [Witness 1] had never done a district internship in our office"; while another staffer 'had no recollection of [Witness 1].").
[60] *Id*. at ¶¶ 50-51, 53.
[61] *Id*. at ¶¶ 50-52, 54.
[62] *Id*. at ¶¶ 51-52.
[63] 18(a) Deposition of Witness 1.
[64] 18(a) Interview of Financial Administrator.
[65] *Id*.
[66] *Id*.
[67] Letter from Counsel to Representative Mike Collins to Committee on Ethics Chairman Michael Guest and Ranking Member Mark DeSaulnier (Nov. 9, 2026) (Appendix C) (hereinafter Representative Collins' November Response).
[68] 18(a) Interview of Financial Administrator.

time in D.C. received comparable compensation, and no other individual with a "district intern" title received any compensation.[69]

2. *Volunteer Services*

In addition to the two internships, Witness 1 created content for Representative Collins' official social media accounts beginning in the summer of 2024 through February 2026, for a total of approximately 18 months.[70] She testified that her work included a daily history post and weekly Bible verse that were posted in the morning.[71] When asked, Witness 1 stated she considered herself to be a volunteer and she did not seek payment for this work.[72] The Committee did not find any evidence that Witness 1 was compensated for her social media services. During this time, she maintained full-time employment as an analyst at a telecommunications company, and she told the Committee that she ultimately informed Mr. Phillips that she did not want to continue to produce content for Representative Collins' congressional office because she wanted to focus on her primary employment.[73]

Representative Collins declined to inform the Committee of whether he was aware of Witness 1's volunteer services. However, in response to the OCC Referral, counsel to Representative Collins stated Witness 1 "continued this important work in 2025," acknowledging that at least by the time he was made aware of the OCC Referral, he was also aware of Witness 1's volunteer services.[74]

B. Allegations Related to the Chief of Staff

OCC also referred allegations that Mr. Phillips misused the MRA to pay for hotels, meals, and travel between Georgia and D.C., including for campaign or personal purposes from 2023 through 2024.[75] Members are responsible for overseeing the use of the MRA allotted to their congressional offices.

Mr. Phillips began serving as Chief of Staff to Representative Collins when the congressman first took office in January 2023. A review of Mr. Phillips' expense reports from

[69] *Id*.; Q4 2023 SOD at 727.
[70] 18(a) Deposition of Witness 1.
[71] *Id*. Witness 1 also produced over 700 individual items of social media content that she testified she created.
[72] *Id*.
[73] *Id*.
[74] Representative Collins' OCC Response.
[75] OCC Referral ¶¶ 71-72. The OCC Referral also relayed allegations that Mr. Phillips was solely doing campaign work from approximately July 1, 2024, through September 7, 2024, but continued to receive his official salary. *Id*. at ¶¶ 94-95. The allegations were largely based on the testimony of one staffer, and neither OCC nor the Committee found additional evidence corroborating this allegation. However, in its investigation of this allegation, the Committee considered whether Mr. Phillips received income in excess of the outside earned income limitations for senior staff in connection with campaign work. Although the Committee lost jurisdiction to investigate Mr. Phillips upon his termination on May 5, 2026, and did not make any conclusions about Mr. Phillips' outside earned income, the Committee found that Mr. Phillips failed to pay a $200.00 late fee associated with the late filing of his 2025 Financial Disclosure Statement for calendar year 2024, and that Mr. Phillips failed to file his Termination Financial Disclosure Statement in 2026 or to pay the $200.00 late filing fee related to that disclosure. *See* Letter from Committee on Ethics Director of Financial Disclosure to Brandon Phillips (Feb. 12, 2026); Letter from Committee on Ethics Director of Financial Disclosure to Brandon Phillips (July 10, 2026).

2023 and 2024 indicate that Representative Collins' office spent $70,760.63 on travel and related expenses by Mr. Phillips in 2023 and $58,525.70 in 2024.[76] These expenses comprise lodging, taxi/ride shares, airfare, meals, Wi-Fi during travel, and parking.[77] As Chief of Staff, Mr. Phillips was responsible for reviewing and approving most expenses submitted for MRA reimbursement.[78] However, for Mr. Phillips' own expenses, the office's Financial Administrator was the approver.[79] The Financial Administrator explained that a financial administrator's role is not to decide how congressional offices spend their MRA funds but rather to attempt to ensure that expenses appear reimbursable on their face based on CHA guidelines before those expenses are submitted for review by the Chief Administrative Office's (CAO) financial office.[80]

Mr. Phillips' duty station was the district, although his primary residence was in Whigham, Georgia (several hours south of Representative Collins' district).[81] One staffer explained, "when Congress was in session, during the week [Mr. Phillips] was in D.C. And when that [] work week was over, he would fly back to wherever it is he resided."[82] Mr. Phillips' expense reports show regular flights between D.C. and Atlanta (adjacent to the district) and hotels in D.C., which are allowable expenses under the MRA for a traveling Chief of Staff.

However, the Committee identified several potentially improper expenses that were reimbursed to Mr. Phillips, including: (i) a $441.00 hotel expense for December 30, 2023, through January 1, 2024, for which no potential official purpose was provided;[83] (ii) $4,615.80 in flights to Tallahassee, Florida;[84] and (iii) $630.70 in personal mileage reimbursements associated with Mr. Phillips' commute between his primary residence and duty station.[85]

The Financial Administrator testified that overall, the types and amounts of Mr. Phillips' reimbursements were normal for traveling Chiefs of Staff.[86] However, in several instances, the Financial Administrator acknowledged that the reimbursements identified above warranted further scrutiny. For example, when asked whether the fact that the hotel expense was over a major holiday raised any red flags, he responded, "I did not think about that, but that is something to take into consideration."[87] Likewise, when asked about the flights to Tallahassee, he testified, "That's

[76] *See generally* SOD Website.
[77] *See id*.
[78] 18(a) Interview of Financial Administrator; *see also* OCC Exhibit 4 (section on "Travel Expense Reimbursement Policy").
[79] 18(a) Interview of Financial Administrator.
[80] *Id*.
[81] *Id*.; Letter from Counsel to Brandon Phillips to Committee on Ethics Chairman Michael Guest and Ranking Member Mark DeSaulnier (Apr. 24, 2026) (identifying Mr. Phillips' residences from 2023 through the present); Letter from Counsel to Representative Collins to Committee on Ethics Chairman Michael Guest and Ranking Member Mark DeSaulnier (July 24, 2026) (Appendix C).
[82] OCC Referral ¶ 81. Witness 1 and Financial Administrator also testified to this being Mr. Phillips' schedule. 18(a) Interview of Witness 1; 18 (a) Interview of Financial Administrator.
[83] Exhibit 2.
[84] Exhibit 3; Exhibit 4; Exhibit 5; Exhibit 6. These flights averaged approximately 3 to 4 times the cost of Mr. Phillips' flights into and out of Atlanta. The Committee also had concerns regarding Mr. Phillips' flights between Atlanta and D.C. during the August recesses but did not find sufficient evidence that there was not an official purpose for this travel.
[85] Exhibit 7; Exhibit 8.
[86] 18(a) Interview of Financial Administrator.
[87] *Id*.

very strange . . . . I would initially say, most likely, 'no' [this is not an allowable use of the MRA] . . . he probably should've stopped in Atlanta."[88] With additional information about the proximity of the Tallahassee airport to Mr. Phillips' primary residence, the Financial Administrator said, "that would probably be something that I would need to talk to a finance person about" to see whether the expense is allowable if it is "less expensive" than flying to another airport; however, he did not do so, and the cost to fly to Tallahassee was substantially greater than flying to Atlanta.[89]

V. FINDINGS

A. The Committee found substantial evidence that Witness 1's internships violated House Rules related to paid interns and that Representative Collins' congressional office accepted improper voluntary services.

House Rule XXIII, clause 8 states that "[a] Member . . . or officer of the House may not retain an employee who does not perform duties for the offices of the employing authority commensurate with the compensation such employee receives." Clause 8 serves to prohibit not only the most egregious instances of a "ghost employee" scheme, where a real or fictitious person is recorded on the payroll as a way to divert official funds to the personal benefit of the employer,[90] but also instances where individuals, including family members or personal friends, have been hired to a congressional office for a stated purpose but provided minimal work consistent with that purpose.[91] House regulations also set forth additional requirements with respect to staff serving in Member's offices. Each Member serves an authorized employing authority for their own office and has discretion to determine terms and conditions of employment and service for their staff – provided such terms and conditions are consistent with applicable federal laws and House Rules.[92] Member offices may hire a limited number of employees, including a maximum of four non-permanent employees, such as those appointed as "temporary employees" or interns paid from the MRA.[93] A Member's office may employ "temporary employees" for a "specified purpose or task" for up to 90 days in a calendar year.[94] Members may also employ interns who are paid from the MRA or through a separate allowance for the HPIP; those funds are specifically appropriated for the purpose of paying interns through that program and interns paid through that program do not count against the cap on temporary employees.[95] Regardless of whether an intern is paid from the MRA or the HPIP, paid interns "must perform services for the Member on a temporary basis as part of an educational plan," and are "ineligible to telework" subject to certain exceptions.[96]

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[88] *Id*.
[89] *Id*.; *see* Exhibit 3 (Atlanta and Tallahassee flights), Exhibit 4 (same), Exhibit 5 (Tallahassee flight), Exhibit 6 (Tallahassee flights).
[90] *See, e.g., Powell*; *Diggs;* Comm. on Standards of Official Conduct, *Summary of Activities, One Hundredth Congress*, H. Rept. 100-1125, 100th Cong., 2d Sess. 15-16 (*In the Matter of Delegate Fofo I.F. Sunia and Matthew K. Iuli*); *see also Robinson*, 903 F. Supp. at 791; *Harloff*, 815 F. Supp. at 619; 18 U.S.C. § 666(c).
[91] *See, e.g.*, *Wilson*; *see also Meadows*; Comm. on Ethics, *In the Matter of Allegations Relating to Representative Laura Richardson*, H. Rept. 112-642, 112th Cong. 2d Sess. (2012); *Rose Collins*; *Murphy*.
[92] *Members' Handbook* at 7.
[93] *Id*. at 8; 2 U.S.C. § 5321.
[94] *Members' Handbook* at 9-10.
[95] Members may also retain interns who are unpaid.
[96] *Members' Handbook* at 8.

The Committee found that Witness 1's pay for "internships" was not consistent with House Rule XXIII, clause 8 and House regulations relating to paid interns. She worked remotely for the vast majority of her internships, she did not participate in any educational programming, and she was not hired and her work was not overseen in accordance with the typical practices of the district office. Even had Witness 1 been hired as a "temporary employee," to whom these regulations regarding paid interns would not apply, Witness 1's salary was not commensurate with the official duties she performed; she did not provide a "full day's labor" as compared to others in Representative Collins' office who worked more hours but earned less. In any event, Witness 1 was not a "temporary employee" paid out of the MRA, but rather a beneficiary of a limited pool of money specifically appropriated by the House for *internships*. There is clear evidence that Mr. Phillips intended to use the money appropriated for interns through the HPIP, rather than more discretionary personnel funds in Representative Collins' MRA, to financially benefit Witness 1. This includes directing the Financial Administrator to "set up" Witness 1 as an intern, requesting information about how much was left in the HPIP budget, and directing the Financial Administrator to "max out" Witness 1 to ensure the remaining HPIP was utilized.

The Committee has previously required Members to repay the U.S. Department of Treasury for misappropriated official funds, including in instances where the Member themselves was not directly involved in or aware of the misuse.[97] Representative Collins argued he should not be required to make any repayment because (i) the HPIP is a separate fund from the MRA, and "personal responsibility" of the Member does not apply to this type of misappropriated fund; and (ii) internship salaries are discretionary within proscribed limits.[98] The Committee rejects both of these arguments. First, the same House Rules and regulations apply to interns paid from HPIP as the MRA, and the same source funds it – the taxpayer. While the *Members' Handbook* only explicitly specifies that Members are responsible for misuse of the MRA, the Committee's position that Members can be held responsible for any misappropriation of official resources under their supervision is both commonsense accountability and longstanding precedent.[99] Second, while Members have significant discretion over how interns function in their office, they are still subject to the regulations set forth by the Committee on House Administration, as well as by the requirement that appropriations be used for their appropriated purpose. The funds used to pay Witness 1 were used in a manner that exceeded those regulations and the funds' intended purpose.

In this instance, Witness 1 was paid approximately $630.00 per week of her internships in 2023 and 2024. The Committee considered whether the entirety of her pay should be reimbursed due to the failure to comply with House Rules and regulations regarding interns. However, in light of the fact that Witness 1 did provide some services to the congressional office that overlapped with the period of time she was paid as an "intern," the Committee determined that a conservative but fair assessment of the amount Witness 1 was overpaid across these internships was $2,880.00 (based on the average pay of paid interns in Representative Collins' congressional office).[100]

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[97] *See, e.g.*, *McMorris Rodgers*; Comm. on Ethics, *In the Matter of Allegations Relating to Representative Luis V. Gutiérrez*, H. Rept. 115-617, 115th Cong. 2d Sess. (2018) (finding that although there was not a knowing or willful intent to misuse the MRA, the Member was required to repay misused MRA funds).

[98] *See* Representative Collins' November Response.

[99] *See Ethics Manual* at 20; *Murphy* at 4.

[100] The average pay of other interns in 2023 and 2024 was approximately $450.00 per week. Witness 1 was paid on average $180.00 more per week than the average D.C. intern, for 16 weeks of internship.

Representative Collins maintains that he had no direct involvement in determining Witness 1's compensation, employment classification, or source of funding, relying instead on experienced senior staff and financial personnel to ensure compliance with applicable House requirements. He has asserted that while he "recognizes his ultimate responsibility for overseeing his congressional office, he was not personally involved in the payroll decisions at issue." Representative Collins further maintains that describing Witness 1's employment as a "fake internship" is misleading because she performed legitimate services for the office and notes that, had she been appropriately classified as a part-time employee, the internship-specific requirements cited by the Committee would not have applied. In his view, this was "an issue of employment classification and administration, not fictitious employment."

There were additional problems with the manner in which Witness 1 provided services to the congressional office. 31 U.S.C. § 1342 prohibits the use voluntary services by Members of Congress and other government officials. House Rule XXIV prohibits defraying official costs through the use of impermissible voluntary services. An individual providing communications services to a congressional office should be formally hired for the period of time in which those services are provided, and should be paid appropriately through official funds, with her salary disclosed as required. Not only did the office impermissibly pay Witness 1 for a fake "internship," but the office failed to properly pay and employ Witness 1 for real communications services.

The Committee found that Witness 1 provided volunteer services for Representative Collins' congressional office for periods other than her internships, totaling approximately 18 months, in violation of applicable federal law and House Rules. Witness 1 herself testified that she was a volunteer during these periods and produced evidence of her work product. Accordingly, Witness 1's performance of work for Representative Collins' congressional office from approximately June to early October 2024, and early December 2024 through February 2026, is a violation of prohibitions on volunteer services.[101] In other matters involving volunteer services, the Committee has found "the regular involvement of a volunteer [] in a congressional office who performs tasks properly associated with the official responsibilities of House Members is inappropriate."[102] Nonetheless, the Committee has not historically found reimbursement to be required for violations of the prohibition on unofficial office accounts, including the use of voluntary services.[103]

B. The Committee did not find substantial evidence that Representative Collins' congressional office misused MRA funds with respect to Mr. Phillips' travel.

The *Members' Congressional Handbook* (*Members' Handbook*) states that, "[o]nly expenses, the primary purpose of which [is] official and representational," are reimbursable from

[101] *See* 31 U.S.C. § 1342; House Rule XXIII, clause 8(a); House Rule XXIV, clause 1(a).
[102] *McMorris Rodgers* at 22 (citing Comm. on Standards of Official Conduct, *In the Matter of Representative Bud Shuster*, H. Rept. 106–979, 106th Cong. 2d Sess. 44 (2000)) (finding that a speech consultant provided improper volunteer services for, *inter alia*, "working with [Representative McMorris Rodgers'] official communications team on media relations.").
[103] *Id*. at 52 (emphasizing that although the Committee has not required reimbursements for such violations, "[t]hat is not to say that the Committee views violations of Rule XXIV as any less serious than violations involving the misuse of official resources, only that reimbursement of the Treasury is not an appropriate remedy in such a situation.").

the MRA.[104] Official travel includes local travel and travel away from home overnight to conduct official and representational duties. Official travel must originate and terminate in either Washington, D.C., the Member's District, or another location of official business except where otherwise stipulated in the Handbook.[105] Although officially-connected travel is generally reimbursable from official funds, under CHA regulations, "living and commuting expenses" are not reimbursable except in extraordinary circumstances and when specifically authorized by the Member or CHA.[106] "Living expenses" is defined to include "meals, housing, and other personal expenses incurred at the Member's or employee's residence or duty station," and "commuting expenses" is defined to include "transportation expenses incurred by the Member or employee while commuting between their residence and duty station."[107] While Mr. Phillips' duty station was the district, and thus travel costs between the district and Washington, D.C., could be considered permissible official travel, the added costs of his travel to and from his home outside the district were not permissible. Moreover, to the extent that any of Mr. Phillips' travel costs were for campaign or personal reasons, reimbursement of those costs was not permissible.

Members of Congress are ultimately responsible for how the MRA is used by their congressional offices, including ensuring that their offices maintain a procedure for effective and meaningful review of expenses submitted for MRA reimbursement.[108] Mr. Phillips appears to have used MRA funds for thousands of dollars of impermissible travel expenses over several years. "[T]he person being reimbursed" is responsible for asserting an expense is official;[109] however, Mr. Phillips failed to appear to provide subpoenaed testimony, and the Committee could not determine whether the identified expenses were in fact for official and representational purposes, or the precise amount of impermissible "commuting costs" that were reimbursed by the MRA.

Representative Collins emphasizes that he was not personally involved in submitting, reviewing, or approving Mr. Phillips' travel reimbursement, asserting through his counsel:

> Those expenses were processed and approved through the office's established financial review procedures, without concerns being raised to Representative Collins regarding their propriety. Consistent with standard practice in congressional offices, he relied on the personnel responsible for administering those procedures to ensure compliance with applicable House requirements and did not direct or knowingly authorize any improper reimbursements. In his view, any discussion of these expenditures should distinguish his general oversight responsibilities from Mr. Phillips' individual expense submissions and the approval decisions made through established financial channels.

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[104] *Members' Handbook* at 5. The *Members' Handbook* similarly states that the MRA is to be used to pay "Ordinary and necessary expenses incurred by the Member or the Member's employees . . . in support of the conduct of the Member's official and representational duties to the district from which he or she is elected." *Id*. at 4.
[105] *Id*. at 42.
[106] *Id*.
[107] *Id.*
[108] *Id*. at 6.
[109] 18(a) Interview of Financial Administrator.

The Committee's record indicates there was not sufficient oversight of Mr. Phillips' official expenditures. The Committee considered whether Representative Collins should be required to reimburse any or all of an approximate amount of Mr. Phillips' improper travel-related expenses. However, the reimbursements were approved through normal channels and there was no indication that the Financial Administrator or CAO raised concerns about Mr. Phillips' travel costs. Accordingly, the Committee determined it was not necessary to direct Representative Collins to personally reimburse the potentially improper expenditures.

VI. CONCLUSION

The evidence in this matter demonstrates that Representative Collins was not sufficiently overseeing his Chief of Staff's actions, both with respect to hiring, paying, and accepting volunteer services of the woman with whom he had a romantic relationship and his own travel expenses. This caused the congressional office to accept improper voluntary services from Witness 1 for years, improperly pay Witness 1 from the House internship fund, and to make potentially improper disbursements from the MRA to Mr. Phillips. The Committee reminds all Members that they are ultimately responsible for the use of the MRA and ensuring their offices comply with federal laws and House Rules and regulations.

Following discussions with Representative Collins, the Committee and Representative Collins reached a mutually agreeable resolution regarding Witness 1's compensation. As part of that resolution, $2,880 will be returned to the U.S. Treasury. The Committee appreciates Representative Collins's cooperation throughout its review and will consider this matter closed.

VII. STATEMENT UNDER HOUSE RULE XIII CLAUSE 3(c)

The Committee made no special oversight findings in this Report. No budget statement is submitted. No funding is authorized by any measure in this Report.