

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL CONDUCT
UNITED STATES HOUSE OF REPRESENTATIVES

REPORT

Review No. 25-5681

The Board of the Office of Congressional Conduct (hereafter “the Board”), by a vote of no less than four members, on November 18, 2025, adopted the following report and ordered it to be transmitted to the Committee on Ethics of the United States House of Representatives (hereafter “the Committee”).

SUBJECT: Representative Nancy Mace

NATURE OF THE ALLEGED VIOLATION: Rep. Mace may have engaged in improper reimbursement practices under the House reimbursement program by seeking reimbursements that exceeded her reimbursable expenses incurred. If Rep. Mace engaged in improper reimbursement practices, then she may have violated House rules, standards of conduct, and federal law.

RECOMMENDATION: The Board recommends that the Committee further review the above allegation concerning Rep. Mace because there is substantial reason to believe that Rep. Mace engaged in improper reimbursement practices.

VOTES IN THE AFFIRMATIVE: 6

VOTES IN THE NEGATIVE: 0

ABSTENTIONS: 0

MEMBER OF THE BOARD OR STAFF DESIGNATED TO PRESENT THIS REPORT TO THE COMMITTEE: Omar S. Ashmawy, Staff Director & Chief Counsel.

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

FINDINGS OF FACT AND CITATIONS TO LAW

TABLE OF CONTENTS

I.	INTRODUCTION	3
	A. Summary of Allegations.....	3
	B. Jurisdictional Statement	3
	C. Procedural History.....	3
	D. Summary of Investigative Activity	4
II.	REP. MACE MAY HAVE ENGAGED IN IMPROPER REIMBURSEMENT PRACTICES BY SEEKING REIMBURSEMENTS THAT EXCEEDED HER REIMBURSABLE EXPENSES INCURRED.	5
	A. Applicable Law, Rules, and Standards of Conduct.....	5
	B. Rep. Mace Received Reimbursement from the MRA in 2023 and 2024 for Lodging Expenses—But the Amounts Reimbursed Do Not Appear to Reflect Rep. Mace’s Actual, Incurred Lodging Expenses.	7
III.	CONCLUSION	12
IV.	INFORMATION THE OCC WAS UNABLE TO OBTAIN AND RECOMMENDATION FOR THE ISSUANCE OF SUBPOENAS.....	12

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL CONDUCT
UNITED STATES HOUSE OF REPRESENTATIVES

FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 25-5681

On November 18, 2025, the Board of the Office of Congressional Conduct (hereafter “the Board”) adopted the following findings of fact and accompanying citations to law, regulations, rules and standards of conduct (*in italics*).

I. INTRODUCTION

A. Summary of Allegations

1. Rep. Mace may have engaged in improper reimbursement practices under the House reimbursement program by seeking reimbursements that exceeded her reimbursable expenses incurred. If Rep. Mace engaged in improper reimbursement practices, then she may have violated House rules, standards of conduct, and federal law.
2. The Board recommends that the Committee on Ethics of the United States House of Representatives (“Committee”) further review the above allegation concerning Rep. Mace because there is substantial reason to believe that Rep. Mace engaged in improper reimbursement practices.

B. Jurisdictional Statement

3. The allegations that were the subject of this review concern Rep. Mace, a Member of the United States House of Representatives from the 1st Congressional District of South Carolina. The Resolution the United States House of Representatives adopted creating the Office of Congressional Conduct (“OCC”) directs that, “[n]o review shall be undertaken ... by the [B]oard of any alleged violation that occurred before the date of adoption of this resolution.”¹ The House adopted this Resolution on March 11, 2008.

C. Procedural History

4. The OCC received a written request for a preliminary review in this matter signed by at least two members of the Board on May 21, 2025. The preliminary review commenced on May 22, 2025.²
5. On May 23, 2025, the OCC notified Rep. Mace of the initiation of the preliminary review, provided her with a statement of the nature of the review, notified her of her right to be

¹ H. Res. 895 of the 110th Congress § 1(e) (2008) (as amended) (hereafter the “Resolution”).

² A preliminary review is “requested” in writing by members of the Board of the OCC. The request for a preliminary review is received by the OCC on a date certain. According to the Resolution, the timeframe for conducting a preliminary review is 30 days from the date of receipt of the Board’s request.

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended represented by counsel in this matter, and notified her that invoking her right to counsel would not be held negatively against her.³

6. At least three members of the Board voted to initiate a second-phase review in this matter on June 17, 2025. The second-phase review commenced on June 21, 2025.⁴ The second-phase review was scheduled to end on August 4, 2025.
7. On June 23, 2025, the OCC notified Rep. Mace of the initiation of the second-phase review in this matter, and again notified her of her right to be represented by counsel in this matter, and that invoking that right would not be held negatively against her.⁵
8. The Board voted to extend the second-phase review by an additional period of fourteen days on July 22, 2025. The additional period ended on August 18, 2025.
9. The Board voted to refer the matter to the Committee for further review and adopted these findings on November 18, 2025.
10. The report and its findings in this matter were transmitted to the Committee on December 1, 2025.

D. Summary of Investigative Activity

11. The OCC requested documentary and, in some cases, testimonial information from the following sources:

- (1) Rep. Mace;
- (2) Daniel Hanlon;
- (3) Lorie Khatod;
- (4) Richard Chalkey;
- (5) CAO;
- (6) Witness 1;
- (7) Witness 2;
- (8) Witness 3;
- (9) Witness 4;
- (10) Witness 5;
- (11) Witness 6;
- (12) Witness 7;
- (13) Witness 8;
- (14) Witness 9;
- (15) Witness 10;
- (16) Witness 11;

³ Letter from Omar S. Ashmawy, Chief Counsel and Staff Dir., Office of Cong. Conduct, to Rep. Mace (May 23, 2025).

⁴ According to the Resolution, the Board must vote (as opposed to make a written authorization) on whether to conduct a second-phase review in a matter before the expiration of the 30-day preliminary review. If the Board votes for a second phase, the second phase commences the day after the preliminary review ends.

⁵ Letter from Omar S. Ashmawy, Chief Counsel and Staff Dir., Office of Cong. Conduct, to Rep. Mace (June 23, 2025).

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

(17) Witness 12.

12. The following individuals and entities refused to cooperate with the OCC's review:

- (1) Rep. Mace;
- (2) Daniel Hanlon;
- (3) Lorie Khatod; and
- (4) Richard Chalkey.

II. REP. MACE MAY HAVE ENGAGED IN IMPROPER REIMBURSEMENT PRACTICES BY SEEKING REIMBURSEMENTS THAT EXCEEDED HER REIMBURSABLE EXPENSES INCURRED.

A. Applicable Law, Rules, and Standards of Conduct

13. Federal Statutes

Title 18 U.S.C. § 1001 (a)(2), (c)(1), prohibits Members from submitting "a claim for payment" to the U.S. House of Representatives that contains a false statement concerning the purpose for which reimbursement is sought. If a Member submits such a claim, then the Member has "knowingly and willfully" made a "materially false, fictitious or fraudulent statement or representation" to the legislative branch in violation of federal law.

Title 18 U.S.C. § 641 provides in part that "[w]hoever embezzles, steals, purloins, or knowingly converts to [her] use or the use of another thing of value... of the United States or of any department or agency thereof... has committed a felony punishable by fines or imprisonment of up to ten years."

Title 31 U.S.C. § 1301 states that "[a]ppropriations shall be applied only to the objects for which the appropriations were made except as otherwise provided by law."

14. House Rules

House Rule 23, clause 1 provides, "[a] Member, Delegate, Resident Commissioner, officer, or employee of the House shall behave at all times in a manner that shall reflect creditably on the House."

House Rule 23, clause 2 provides, "[a] Member, Delegate, Resident Commissioner, officer, or employee of the House shall adhere to the spirit and the letter of the Rules of the House and to the rules of duly constituted committees thereof."

15. Members' Congressional Handbook

The Members' Congressional Handbook provides that

[o]rdinary and necessary expenses incurred by Members during official travel between a Member's primary residence and Washington, D.C., as well as while on official business in Washington, D.C., are reimbursable. These expenses include

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

meals, incidentals and lodging. Lodging reimbursement may include costs associated with hotels, rentals, or other housing expenses. Members may be reimbursed for official and necessary travel expense incurred for meals, incidentals, and lodging on days the House is in session or when attending an official committee business meeting or hearing but not to exceed the daily rate for meals, incidentals and lodging as determined by the General Services Administration for the Washington, D.C. area. Members seeking reimbursement shall submit a monthly expense voucher, and reimbursement shall not exceed expenses incurred. In lieu of receipts, Members shall certify that they have incurred the eligible expenses (for which reimbursement has not otherwise been received) for which they seek reimbursement. Members whose primary residence is within 50 miles of the Capitol may not be reimbursed for lodging expenses except in extraordinary circumstances. Expense reimbursements are subject to existing state and federal tax law.⁶

16. House Ethics Manual

The House Ethics Manual explains generally that

A Member is responsible for assuring that resources provided for support of official duties are applied to the proper purposes.⁷

Moreover, the House Ethics Manual notes that

The misuse of the funds and other resources that the House of Representatives entrusts to Members for the conduct of official House business is a very serious matter. Depending on the circumstances, such conduct may result in not only disciplinary action by the House, but also criminal prosecution. Moreover, while any House employee who makes improper use of House resources is subject to disciplinary action by the Standards Committee, each Member should be aware that he or she may be held responsible for any improper use of resources that occurs in the Member's office. The Standards Committee has long taken the position that each Member is responsible for assuring that the Member's employees are aware of and adhere to the rules, and for assuring that House resources are used for proper purposes.⁸

The House Ethics Manual additionally states that

⁶ See House Committee on House Administration, *Members' Congressional Handbook* (adopted April 30, 2024) at 40 (hereinafter "*Members' Handbook*"), available at https://cha.house.gov/_cache/files/1/d/1db10826-1c45-4262-9cc5-3b617ea0ba60/9BB060DA6353C563584F7C384AF76E94.members-congressional-handbook-04-30-24-20-.pdf.

⁷ House Committee on Ethics, *House Ethics Manual* (2022 Print) (hereinafter "*House Ethics Manual*") at 132.

⁸ *House Ethics Manual* at 133-34 (internal citations omitted).

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

*The use of the MRA for other than official purposes, including double billing and claims for nonexistent expenses, could subject a Member, officer, or employee to civil penalties under the False Claims Act.*⁹

B. Rep. Mace Received Reimbursement from the MRA in 2023 and 2024 for Lodging Expenses—But the Amounts Reimbursed Do Not Appear to Reflect Rep. Mace’s Actual, Incurred Lodging Expenses.

i. House Reimbursement Program and Rep. Mace’s Requests for Reimbursement

17. Rep. Mace assumed office as U.S. Representative for South Carolina's 1st Congressional District on January 3, 2021.
18. In late 2022, the House Committee on House Administration adopted Committee Resolution 117-25, permitting Members to be reimbursed for ordinary and necessary travel expenses—including lodging, meals, and incidentals—when on official business in Washington, D.C.¹⁰ Reimbursement is limited to per diem rates set by the General Services Administration (GSA).¹¹ The reimbursement process was implemented in April 2023 and allowed members to seek retroactive reimbursement from January 3, 2023.¹²
19. Rep. Mace participated in the House program, seeking and receiving reimbursement for D.C. lodging expenses most months between January 2023 and September 2024.¹³

⁹ House Ethics Manual at 339 (internal citations omitted).

¹⁰ Committee on House Administration, Committee Resolution 117-25 (117th Cong. Dec. 23–27, 2022).

¹¹ See *id.*

¹² See April 7, 2023, Email from Rep. Mace to Witness 2, Forwarding Email from Catherine Szpindor re “Update from Speaker McCarthy & Leader Jeffries (Exhibit 1 at 25-5681_002).

¹³ See, e.g., January 2023, Member of Congress Official Business Expense Reimbursement Form (Exhibit 2 at 25-5681_0005); February 2023, Member of Congress Official Business Expense Reimbursement Form (Exhibit 3 at 25-5681_0008); March 2023, Member of Congress Official Business Expense Reimbursement Form (Exhibit 4 at 25-5681_0011); April 2023, Member of Congress Official Business Expense Reimbursement Form (Exhibit 5 at 25-5681_0014); May 2023, Member of Congress Official Business Expense Reimbursement Form (Exhibit 6 at 25-5681_0017); June 2023, Member of Congress Official Business Expense Reimbursement Form (Exhibit 7 at 25-5681_0020); September 2023, Member of Congress Official Business Expense Reimbursement Form (Exhibit 8 at 25-5681_0023); October 2023, Member of Congress Official Business Expense Reimbursement Form (Exhibit 9 at 25-5681_0026); November 2023, Member of Congress Official Business Expense Reimbursement Form (Exhibit 10 at 25-5681_0029); December 2023, Member of Congress Official Business Expense Reimbursement Form (Exhibit 11 at 25-5681_0032); January 2024, Member of Congress Official Business Expense Reimbursement Form (Exhibit 12 at 25-5681_0035); February 2024, Member of Congress Official Business Expense Reimbursement Form (Exhibit 13 at 25-5681_0038); March 2024, Member of Congress Official Business Expense Reimbursement Form (Exhibit 14 at 25-5681_0041); April 2024, Member of Congress Official Business Expense Reimbursement Form (Exhibit 15 at 25-5681_0044); May 2024, Member of Congress Official Business Expense Reimbursement Form (Exhibit 16 at 25-5681_0047); June 2024, Member of Congress Official Business Expense Reimbursement Form (Exhibit 17 at 25-5681_0050); July 2024, Member of Congress Official Business Expense Reimbursement Form (Exhibit 18 at 25-5681_0053); September 2024, Member of Congress Official Business Expense Reimbursement Form (Exhibit 19 at 25-5681_0056); Statement of Disbursements of the House of Representatives: Jan. 1–Mar. 31, 2023, H. Doc. No. 118-27, 118th Cong., 1st Sess. (2023); Statement of Disbursements of the House of Representatives: Apr. 1–Jun. 30, 2023, H. Doc. No. 118-50, 118th Cong., 1st Sess. (2023); Statement of Disbursements of the House of Representatives: Jul. 1–Sep. 30, 2023, H. Doc. No. 118-69, 118th Cong., 1st Sess. (2023); Statement of Disbursements of the House of Representatives: Oct. 1–Dec. 31, 2023, H. Doc. No. 118-98,

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

20. While on official business in D.C. during that time, Rep. Mace stayed at a home she owned with her then fiancé (hereinafter, the “DC Property”). Under the new House program, she could seek reimbursement for certain costs associated with the DC Property and its upkeep—up to the daily GSA lodging rate.¹⁴ These costs included “utilities, condo, cooperative or HOA fees, insurance and taxes attributable to ordinary and necessary business travel (e.g., days on which lodging reimbursement is otherwise eligible)” and could not “exceed the total housing expenses incurred in that month.”¹⁵
21. Rep. Mace requested and received the maximum allowable reimbursement for each month she filed a reimbursement request form. Information available to and reviewed by the OCC suggests that Rep. Mace was reimbursed more than the true costs for the property during several months in 2023 and 2024.¹⁶
22. The OCC reviewed invoices and other documents pertaining to the DC Property’s expenses, including utility bills and escrow amounts for property taxes and insurance related to the property.¹⁷ The OCC identified discrepancies between the amounts requested and received by Rep. Mace for reimbursement and the total of these associated bills. In 2023, Rep. Mace’s requests for reimbursement exceeded the total of the DC Property’s expenses in January, February, March, May, June, September, October, and November. In 2024, Rep. Mace’s requests for reimbursement exceeded the total of the DC Property’s expenses in January, March, April, and May—amounting to an excess of \$9,485.46.¹⁸

118th Cong., 2nd Sess. (2024); Statement of Disbursements of the House of Representatives: Jan. 1–Mar. 31, 2024, H. Doc. No. 118-128, 118th Cong., 2nd Sess. (2024); Statement of Disbursements of the House of Representatives: Apr. 1–Jun. 30, 2024, H. Doc. No. 118-149, 118th Cong., 2nd Sess. (2024); Statement of Disbursements of the House of Representatives: Jul. 1–Sep. 30, 2024, H. Doc. No. 118-170, 118th Cong., 2nd Sess. (2024); Statement of Disbursements of the House of Representatives: Oct. 1–Dec. 31, 2024, H. Doc. No. 119-5, 119th Cong., 1st Sess. (2025).

¹⁴ See Committee on House Administration, Committee Resolution 117-25 (117th Cong. Dec. 23–27, 2022).

¹⁵ Member Reimbursement FAQ (Exhibit 20 at 25-5681_0062).

¹⁶ In June 2024, Rep. Mace began paying \$5,400 in monthly rent to her former fiancé for the DC Property. This amount exceeds the maximum allowable reimbursement under the House’s program. This review thus focuses on reimbursement sought by Rep. Mace from January 2023 until May 2024.

¹⁷ See, e.g., Water Bills from January 2023 to May 2024 (Exhibit 21-37 at 25-5681_0066 to 25-5681_0114); Internet Bills from January 2023 to May 2024 (Exhibit 38-59 at 25-5681_0116 to 25-5681_0239); Gas Bills from January 2023 to May 2024 (Exhibit 60-76 at 25-5681_0241 to 25-5681_0290); Electricity Bills from January 2023 to December 2023 (Exhibit 77-88 at 25-5681_0292 to 25-5681_0342); Mortgage Loan Statement from January 2023 to May 2024 (Exhibit 89-105 at 25-5681_0344 to 25-5681_0403); see also Account Statement for bank account associated with the DC Property - January 2023, February 2023, June 2023, August 2023 - October 2023, December 2023, January 2024 - April 2024 (Exhibit 106 - 116 at 25-5681_0405 to 25-5681_0472); see also Spreadsheet Prepared by Witness 3 – Cleaning Expenses tab (Exhibit 124 at 25-5681_0544).

¹⁸ The cost analysis was conducted based on expenses incurred during the listed month. The OCC did not obtain electricity bills for 2024 but included values from bank statements when available.

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

<i>Month</i>	<i>Actual Lodging Expenses¹⁹</i>	<i>Lodging Expenses Reimbursed by House</i>	<i>Reimbursement in Excess of Actual Lodging Expenses (Reimbursed by House – Actual Lodging Expenses)</i>
<i>January-23</i>	\$1,951.97	\$3,196.00	\$1,244.03
<i>February-23</i>	\$1,409.67	\$1,504.00	\$94.33
<i>March-23</i>	\$2,141.36	\$3,354.00	\$1,212.64
<i>April-23</i>	\$2,902.95	\$2,064.00	\$ -838.95
<i>May-23</i>	\$2,699.13	\$3,612.00	\$912.87
<i>June-23</i>	\$2,355.78	\$2,838.00	\$482.22
<i>July-23</i>	\$2,625.53	\$-	\$ -2,625.53
<i>August-23</i>	\$1,962.45	\$-	\$ -1,962.45
<i>September-23</i>	\$2,134.10	\$2,827.00	\$692.90
<i>October-23</i>	\$2,801.97	\$4,176.00	\$1,374.03
<i>November-23</i>	\$2,134.51	\$2,509.00	\$374.49
<i>December-23</i>	\$2,008.14	\$1,737.00	\$ -271.14
<i>January-24</i>	\$2,065.86	\$2,123.00	\$57.14
<i>February-24</i>	\$2,165.71	\$1,544.00	\$ -621.71
<i>March-24</i>	\$1,725.87	\$2,838.00	\$1,112.13
<i>April-24</i>	\$1,925.62	\$3,096.00	\$1,170.38
<i>May-24</i>	\$1,821.70	\$2,580.00	\$758.30

Comparison of the lodging reimbursements claimed by Rep. Mace from January 2023 to May 2024 vs the actual costs for the DC Property, including utilities and escrow payments for property taxes and insurance.

23. For purposes of the above analysis, the OCC assumed Rep. Mace was responsible for 100% of the DC Property’s reimbursable expenses during the periods for which she sought reimbursement—even though Rep. Mace held only a 28% ownership stake in the property.²⁰ Rep. Mace’s counsel represented to the OCC that Rep. Mace was responsible for all of the DC Property’s expenses during the time period at issue.²¹ However, because Rep. Mace declined to interview with the OCC in this review, the OCC was unable to confirm the extent of Rep. Mace’s financial obligations with respect to the DC Property (e.g., whether she was only responsible for a portion of the DC Property’s expenses) or whether her obligations changed after the House approved the program reimbursing Members’ D.C. living expenses.

¹⁹ See, e.g., Water Bills from January 2023 to May 2024 (Exhibit 21-37 at 25-5681_0066 to 25-5681_0114); Internet Bills from January 2023 to May 2024 (Exhibit 38-59 at 25-5681_0116 to 25-5681_0239); Gas Bills from January 2023 to May 2024 (Exhibit 60-76 at 25-5681_0241 to 25-5681_0290); Electricity Bills from January 2023 to December 2023 (Exhibit 77-88 at 25-5681_0292 to 25-5681_0342); Mortgage Loan Statement from January 2023 to May 2024 (Exhibit 89-105 at 25-5681_0344 to 25-5681_0403); see also Account Statement for bank account connected to the DC Property - January 2023, February 2023, June 2023, August 2023 - October 2023, December 2023, January 2024 - April 2024 (Exhibit 106 - 116 at 25-5681_0404 to 25-5681_0472); Spreadsheet Prepared by Witness 3 - Nancy Payments to 1D tab (Exhibit 117 at 25-5681_0474).

²⁰ Operating Agreement For 1 D Street, LLC (Exhibit 118 at 25-5681_0491); see also Rep. Mace Preliminary Response to OCC's Requests for Information, June 16, 2025 (on file with the OCC).

²¹ See Rep. Mace Preliminary Response to OCC's Requests for Information, June 16, 2025 (on file with the OCC).

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

24. Moreover, the OCC requested, but did not receive, documentation from Rep. Mace showing that she actually paid for the DC Property's expenses (i.e., the underlying lodging expenses for which she sought and received reimbursement).
25. The OCC reviewed utility bills and bank statements associated with the DC Property for the relevant periods. Most utility bills were in Rep. Mace's former fiancé's name, and the bank account associated with the DC Property (as well as at least one other property jointly owned by the then couple) paid most utility bills directly.²² Although Rep. Mace may have reimbursed her former fiancé or made payments to the bank account associated with the DC Property for its expenses, she did not provide the OCC with documentation of such payments. To the contrary, the OCC reviewed correspondence between Rep. Mace and Witness 3 (her former fiancé's accountant) suggesting that while she had received reimbursement from the House for her lodging expenses, as of October 5, 2023, she had not contributed the funds to the bank account associated with the DC Property.²³ This correspondence suggests that Rep. Mace received reimbursement for expenses for which she had not yet made any payment.
26. The OCC reviewed documents suggesting that Rep. Mace did make payments to the bank account associated with the DC Property²⁴—but because Rep. Mace refused to interview in this review, the OCC was unable to confirm whether such payments were for the DC Property, other jointly owned properties, or expenses unrelated to the couple's co-owned properties.
27. Based on the information available to the OCC, it appears Rep. Mace was reimbursed amounts exceeding the actual costs incurred for the DC Property during several months in 2023 and 2024. Further, if Rep. Mace did not pay for 100% of expenses related to the DC property—a determination the OCC could neither reach nor reject due to the Congresswoman's lack of cooperation—this would increase the disparity between the amounts Rep. Mace was reimbursed and her actual expenses incurred.

ii. Rep. Mace's Requests for Reimbursement

28. Although the House reimbursement program does not require Members to keep receipts of their expenses, it does require that requests for reimbursement be based on actual expenses incurred.²⁵ Evidence reviewed by the OCC suggests that Rep. Mace was aware of this requirement, but did not base her requests for reimbursement on actual expenses incurred. The OCC reviewed utility bills and property taxes associated with the DC Property. Based

²² See Water Bills from January 2023 to May 2024 (Exhibit 21-37 at 25-5681_0066 to 25-5681_0114); Internet Bills from January 2023 to May 2024 (Exhibit 38-59 at 25-5681_0116 to 25-5681_0239); Gas Bills from January 2023 to May 2024 (Exhibit 60-76 at 25-5681_0241 to 25-5681_0290); see also Account Statement for bank account associated with the DC Property - January 2023, February 2023, June 2023, August 2023 - October 2023, December 2023, January 2024 - April 2024 (Exhibit 106 - 116 at 25-5681_0405 to 25-5681_0472).

²³ Email Chain between Rep. Mace and Witness 3 re "Housing Reimbursement" (Exhibit 119 at 25-5681_0494).

²⁴ Account Statement for account connected to the DC Property - January 2024 (Exhibit 113 at 25-5681_0450); Spreadsheet Prepared by Witness 3 - Nancy Payments to 1D tab (Exhibit 117 at 25-5681_0474).

²⁵ Committee on House Administration, Committee Resolution 117-25 (117th Cong. Dec. 23–27, 2022) ("In lieu of receipts, Members shall certify that they have incurred the eligible expenses (for which reimbursement has not otherwise been received) for which they seek reimbursement.").

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

on the foregoing information available to the OCC, it appears Rep. Mace sometimes requested reimbursement for amounts less than the DC Property's expenses; however, in 12 other months, Rep. Mace requested reimbursement for amounts that exceeded the DC Property's expenses (and thus the amount to which she was entitled). Because Rep. Mace refused to interview in this matter, the OCC was unable to determine how or why Rep. Mace decided to seek the maximum allowable reimbursement when it exceeded her expenses incurred.

29. April 2023 emails between Rep. Mace and her then-chief of staff, Dan Hanlon, show that Rep. Mace was made familiar with the House's new reimbursement process as well as the form that had to be submitted with requests for reimbursement.²⁶ That form requires Members to confirm by signature that they "incurred the above unreimbursed official travel-related expenses" and "acknowledge and [are] aware that making false, fictitious, or fraudulent certification may render the maker subject to criminal prosecution"²⁷
30. The OCC also reviewed an April 2023 email to Rep. Mace from Witness 3, her former fiancé's accountant, which purports to provide an estimated monthly cost of the DC Property based on 2022 data.²⁸ The email, which includes a link to a Google spreadsheet with the DC Property's costs broken down into various categories, suggests that Rep. Mace was entitled to request \$2,462.94 in monthly reimbursement, based on the 2022 costs of the DC Property.²⁹ Rep. Mace requested the maximum allowable reimbursement for every month she filed a reimbursement form; for four of those months, her reimbursement requests exceeded the aforementioned \$2,462.94. Because Rep. Mace declined to interview in this review, the OCC was unable to determine what new information—if any—caused the Congresswoman to request the maximum allowable reimbursement in those months (rather than the \$2,462.94 amount outlined by her then fiancé's accountant, or the totals of the DC Property's expenses, as calculated by the OCC based on utility bills and tax documents for the DC Property).
31. Witness 1, a former staffer in Rep. Mace's congressional office, told the OCC she filled out reimbursement request forms for Rep. Mace during part of the time period relevant to this review. Rep. Mace would review and sign off on the requests and was aware she was seeking the maximum allowable reimbursement.³⁰ Witness 1 explained that the Congresswoman mentioned that the maximum allowable reimbursement fell short of her D.C. living expenses:

- A. So when I first started filling out these forms, the Congresswoman and the Chief of Staff would always talk about how it doesn't even come close to covering her living costs. And so when they checked

²⁶ See April 17, 2023, Email Exchange Between Daniel Hanlon and Rep. Nancy Mace Re: Reimbursements (Exhibit 120 at 25-5681_0497).

²⁷ See, e.g., December 2023 Expense Reimbursement Form (Exhibit 11 at 25-5681_0032).

²⁸ See April 2023 Email Exchange Among Witness 2, Witness 3, and Rep. Nancy Mace (Exhibit 121 at 25-5681_0500 to 5681_0501).

²⁹ See Downloaded Google Spreadsheet of 2022 Expenses (Exhibit 122 at 25-5681_0504).

³⁰ Interview Transcript of Witness 1, August 13, 2025, (Exhibit 123 at 25-5681_0532).

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

over, I made sure that they never went over her current living costs. So the max out was, according to them, accurate.

Q. [...] And so I understand, from what you just said, that the Congresswoman and the Chief of Staff told you that the maximum, that is the GSA rate, was the right amount to claim; is that right?

A. Yes.

Q. [...] And so when you said that you checked to make sure it didn't go over her living expenses, that GSA rate, was that checking, was just talking to the Congresswoman and the Chief of Staff?

A. Yes.³¹

32. Although Rep. Mace's lodging expenses may have exceeded the maximum allowable reimbursement for some months, according to information available to the OCC, Rep. Mace requested and received reimbursement amounts that exceeded her lodging expenses for other months. The evidence discussed above suggests Rep. Mace did not take appropriate measures to ensure she sought reimbursement for expenses actually incurred.

III. CONCLUSION

32. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Mace may have engaged in improper reimbursement practices under the House reimbursement program by seeking reimbursements that exceeded her reimbursable expenses incurred.

33. Accordingly, the Board recommends that the Committee further review the above allegation that Rep. Mace may have engaged in improper reimbursement practices under the House reimbursement program by seeking reimbursements that exceeded her reimbursable expenses incurred.

IV. INFORMATION THE OCC WAS UNABLE TO OBTAIN AND RECOMMENDATION FOR THE ISSUANCE OF SUBPOENAS

34. The following witnesses, by declining to provide requested information to the OCC, did not cooperate with the OCC review:

- a. Rep. Mace;
- b. Daniel Hanlon;
- c. Lorie Khatod; and
- d. Richard Chalkey.

35. The Board recommends that the Committee on Ethics issue subpoenas to:

- a. Rep. Mace;

³¹ Interview Transcript of Witness 1, August 13, 2025, (Exhibit 123 at 25-5681_0531).

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

- b. Daniel Hanlon;
- c. Lorie Khatod; and
- d. Richard Chalkey.