

CONFIDENTIAL

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

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

REPORT

Review No. 19-4101

The Board of the Office of Congressional Ethics (hereafter “the Board”), by a vote of no less than four members, on January 31, 2020, 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: Delegate Michael San Nicolas

NATURE OF THE ALLEGED VIOLATION: Del. San Nicolas may have omitted required information from or disclosed false information in his Federal Election Commission (“FEC”) candidate committee reports. If Del. San Nicolas failed to disclose required information or disclosed false information in his FEC filings, then he may have violated House rules, standards of conduct, and federal law.

Del. San Nicolas may have accepted cash contributions that were in excess of FEC limits for individual donors and in excess of the limits for cash contributions. If Del. San Nicolas accepted such contributions, then he may have violated House rules, standards of conduct, and federal law.

Del. San Nicolas’ campaign committee, Michael San Nicolas for Congress (the “campaign committee”), reported campaign disbursements that may not be legitimate and verifiable campaign expenditures attributable to bona fide campaign or political purposes. If Del. San Nicolas converted campaign funds to personal use, or if Del. San Nicolas’ campaign committee expended funds that were not attributable to bona fide or verifiable campaign or political purposes, then Del. San Nicolas may have violated House rules, standards of conduct, and federal law.

RECOMMENDATION: The Board recommends that the Committee further review the above allegation concerning Del. San Nicolas because there is substantial reason to believe that Del. San Nicolas failed to disclose required information or disclosed false information in his FEC filings.

The Board recommends that the Committee further review the above allegation concerning Del. San Nicolas because there is substantial reason to believe that Del. San Nicolas accepted cash contributions that were in excess of FEC limits for individual donors and in excess of the limits for cash contributions.

The Board recommends that the Committee further review the above allegation concerning Del. San Nicolas because there is substantial reason to believe that Del. San Nicolas converted campaign funds to personal use.

VOTES IN THE AFFIRMATIVE: 6

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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.