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*1st Session*

} HOUSE OF REPRESENTATIVES {

REPORT

119—\_\_

IN THE MATTER OF ALLEGATIONS  
RELATING TO REPRESENTATIVE  
ALEXANDRIA OCASIO-CORTEZ

R E P O R T

OF THE

COMMITTEE ON ETHICS



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**119TH CONGRESS, 1ST SESSION  
U.S. HOUSE OF REPRESENTATIVES  
COMMITTEE ON ETHICS**

**IN THE MATTER OF ALLEGATIONS RELATING TO  
REPRESENTATIVE ALEXANDRIA OCASIO-CORTEZ**

**July 25, 2025**

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

**REPORT**

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**LETTER OF TRANSMITTAL**

July 25, 2025

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 Alexandria Ocasio-Cortez.”

Sincerely,

Michael Guest  
Chairman

Mark DeSaulnier  
Ranking Member

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**119TH CONGRESS, 1ST SESSION  
U.S. HOUSE OF REPRESENTATIVES  
COMMITTEE ON ETHICS**

**IN THE MATTER OF ALLEGATIONS RELATING TO  
REPRESENTATIVE ALEXANDRIA OCASIO-CORTEZ**

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**JULY 25, 2025**

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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 June 23, 2022, the Office of Congressional Conduct (OCC), then known as the Office of Congressional Ethics, transmitted a Report and Findings (Referral) regarding allegations that Representative Alexandria Ocasio-Cortez may have accepted impermissible gifts associated with her attendance at the 2021 Met Gala.<sup>1</sup>

The Committee reviewed the allegations referred by OCC pursuant to Committee Rule 18(a). The Committee found that Representative Ocasio-Cortez proactively took steps to comply with the Gift Rule, including by arranging to pay for various services and to “rent” apparel out of her personal funds that might normally be loaned or gifted to Met Gala participants. Nonetheless, despite Representative Ocasio-Cortez’s significant attempts, the Committee found that she failed to fully comply with the Gift Rule by impermissibly accepting a gift of free admission to the 2021 Met Gala for her partner and by failing to pay full fair market value for some of the items worn to the event. The Committee did not find evidence that Representative Ocasio-Cortez intentionally underpaid for any goods or services received in connection with the Met Gala; in many instances, the congresswoman relied on the advice of counsel in determining appropriate payment amounts, and most discussions about payment were handled through a campaign staffer. However, the Committee did find evidence suggesting that the designer may have lowered costs in response to statements from Representative Ocasio-Cortez’s staff, and that payments to vendors were significantly delayed and, in several cases, did not occur until after OCC initiated its investigation. The Committee also found that Representative Ocasio-Cortez’s staff was overly reliant on the vendors themselves to ensure the congresswoman’s compliance with the Gift Rule, despite the

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<sup>1</sup> Report and Findings from the Office of Congressional Conduct (Review No. 22-8546) (Appendix A) at 3 (hereinafter OCC Referral). The Met Gala is a charity event organized by the Metropolitan Museum of Art (the Met) in partnership with Condé Nast, publisher of Vogue.

vendors' countervailing incentives to ensure she would be able to promote their goods and services.

Based on its findings, the Committee determined that it would be appropriate for Representative Ocasio-Cortez to make additional payments of personal funds to compensate for the fair market value of certain expenses. Upon confirmation of the completion of those payments, the Committee will consider this matter closed. Accordingly, on July 22, 2025, the Committee unanimously voted to issue this Report.

## **II. PROCEDURAL HISTORY**

OCC undertook a preliminary review of this matter on February 19, 2022. On March 21, 2022, OCC initiated a second-phase review of this matter. The Committee received the OCC Referral on June 23, 2022. On December 7, 2022,<sup>2</sup> the Committee publicly announced that it was reviewing an OCC Referral related to Representative Ocasio-Cortez. On February 28, 2023, the Committee determined to carry over the deadline from the 117th Congress and release the OCC Referral two days after the Committee's organizational meeting for the 118th Congress, consistent with Committee precedent. That same day, Representative Ocasio-Cortez submitted a written response to the OCC Referral through her counsel. On March 2, 2023, pursuant to House and Committee Rules, the Committee publicly released the OCC Referral, along with a copy of Representative Ocasio-Cortez's written response.

The Committee reviewed materials provided by OCC, including the transcript of OCC's interview with Representative Ocasio-Cortez. The Committee also requested and received information from Representative Ocasio-Cortez, including documents and narrative responses. In total, Committee staff reviewed over 12,100 pages of material and interviewed Representative Ocasio-Cortez's then-campaign staffer (hereinafter, Former Campaign Staffer), as well as several other individuals who were involved in Representative Ocasio-Cortez's attendance at the 2021 Met Gala.

On July 22, 2025, the Committee unanimously voted to adopt this Report with respect to Representative Ocasio-Cortez.

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

A federal statute, 5 U.S.C. § 7353, prohibits federal officials, including Members of Congress, from soliciting or accepting anything of value, except as provided in rules and regulations issued by their supervising ethics office. For House Members, either the Committee or the "House of Representatives as a whole" is the "supervising ethics office."<sup>3</sup> Accordingly, the House, through House Rule XXV, clause 5 (the Gift Rule), has defined the gifts Members may accept consistent with federal law. The Gift Rule prohibits a Member from knowingly accepting

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<sup>2</sup> The counting of the 45 and 90-day deadlines related to OCC referrals is tolled during the 60-day blackout period prior to any elections in which the subject of the referral is a candidate.

<sup>3</sup> 5 U.S.C. § 7353(d).

a gift unless it fits within one of the rule’s enumerated exceptions.<sup>4</sup> The Gift Rule defines a “gift” broadly, as “a gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or other item having monetary value.”<sup>5</sup> It includes “gifts of services, training, transportation, lodging, and meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.” The gift prohibition does not apply to anything for which the Member pays the market value or does not use and promptly returns to the donor.<sup>6</sup>

There are exceptions to the Gift Rule for attendance at “widely-attended” events and “charity” events.<sup>7</sup> The widely-attended events exception provides that Members may accept an unsolicited offer of free attendance for a widely-attended event for themselves and any “accompanying individual.”<sup>8</sup> “Free attendance” includes all or part of the cost of admission, local transportation, food and refreshments, entertainment, and instructional materials provided to all event attendees.<sup>9</sup> Similarly, a Member may accept an unsolicited offer of free attendance for a charity fundraising event.<sup>10</sup> Though the Committee’s guidance on this subject has evolved in recent years, at the time of the event in question, an unsolicited offer of free attendance could also be accepted for a spouse or dependent child.<sup>11</sup> The “value of tickets to charity or political fundraisers is the value of the meal [...] not the ticket’s value.”<sup>12</sup>

Additionally, clauses 1 and 2 of the Code of Official Conduct (House Rule XXIII) provide that “[a] Member . . . of the House 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.”

#### IV. FACTUAL BACKGROUND

Each year, the Metropolitan Museum of Art (the Met) hosts a Costume Institute Benefit, commonly known as the Met Gala, to raise funds for the museum’s Costume Institute.<sup>13</sup> The Met Gala is the primary source of funding for the Costume Institute, and the Met describes the event

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<sup>4</sup> House Rule XXV, cl. 5(a)(1)(A)(i). If no exception applies, House Rules permit a Member to accept a gift not otherwise prohibited if the Member “reasonably and in good faith believes” the gift has a value of less than \$50 and a cumulative value from one source during a calendar year of less than \$100. House Rule XXV, cl. 5(a)(1)(B)(i).

<sup>5</sup> House Rule XXV, cl. 5(a)(2)(A).

<sup>6</sup> House Rule XXV, cl. 5(a)(3)(A). The Committee’s Gift Guidance provides that the “[t]angible gifts are generally valued at the item’s fair market value, even if the item is not typically for sale. Fair market value is the item’s retail price, not the wholesale price, or the reasonable estimate of an item’s cost if it were available for sale.” Comm. on Ethics, *Gift Guidance*, <https://ethics.house.gov/house-ethics-manual/gifts> (hereinafter House Gift Guidance) (citing House Rule XXV) (last visited July 24, 2025).

<sup>7</sup> House Rule XXV, cl. 5(a)(4)(A) and (C).

<sup>8</sup> House Gift Guidance.

<sup>9</sup> *Id.* Free attendance does not include entertainment collateral to the event or food and refreshments outside the group setting of the event, such as giveaways.

<sup>10</sup> *Id.*

<sup>11</sup> On September 19, 2022, the Committee issued a pink sheet with new guidance regarding the House Gift Rule related to event attendance. This guidance now permits the acceptance of an offer for free attendance for any guest if attendance otherwise complies with the rule. Comm. on Ethics, *Guest Policy Change and Reminder of Gift Rules for Attendance at Events* (Sept. 19, 2022) (hereinafter 2022 Pink Sheet), <https://ethics.house.gov/gift-pink-sheets/guest-policy-change-and-reminder-gift-rules-attendance-events/>.

<sup>12</sup> *House Ethics Manual* (2022) at 26 (hereinafter *Ethics Manual*).

<sup>13</sup> The Met, *The Costume Institute*, THE MET, <https://www.metmuseum.org/departments/the-costume-institute> (last visited July 24, 2025) (hereinafter *The Costume Institute*).



as “one of the most visible and successful charity events, drawing attendees from the worlds of fashion, film, society, sports, business, and music.”<sup>14</sup> Condé Nast, “renowned media compan[y]” and publisher of Vogue,<sup>15</sup> partners with the Met in organizing the event under the leadership of Anna Wintour, the Artistic Director of Condé Nast, now-former Editor-in-Chief of Vogue,<sup>16</sup> and an Honorary Trustee of the Met.<sup>17</sup> Ms. Wintour’s role in the gala included determining a significant portion of the event’s guest list.<sup>18</sup> However, the Met has also historically extended a limited number of invitations each year, including to certain government officials, free of charge.

Representative Ocasio-Cortez has served as a Member of the House since 2019, representing the Fourteenth Congressional District of New York. She received invitations to attend the Met Gala in 2019, 2020, and 2021, but only attended in 2021.<sup>19</sup> Her attendance at the Met Gala on September 13, 2021, garnered extensive media attention in the days following the event, including questions regarding whether her attendance met ethics requirements.<sup>20</sup>

### A. Invitation to the 2021 Met Gala

On May 13, 2021, Condé Nast emailed Former Campaign Staffer to extend an invitation to Representative Ocasio-Cortez and her then-partner, Riley Roberts, for the 2021 Met Gala.<sup>21</sup> The invitation stated that **“Anna [Wintour] would be thrilled to have you and Riley Roberts join us at the gala this September, as guests of Vogue.”**<sup>22</sup> On June 24, 2021, Former Campaign Staffer accepted the invitation on their behalf.<sup>23</sup>

On July 14, 2021, Ms. Wintour called Designer and asked her to “dress AOC for the Met[.]” In discussing this request with another individual, Designer noted that it was “going to be a lot of work because [she would] have to make a dress from scratch.”<sup>24</sup> She also referred to the request as “insane” and said that she “do[es]n’t make clothes.”<sup>25</sup> Designer, and her brand, Brother Vellies, are primarily known for their “luxury accessories,” including shoes and handbags.<sup>26</sup> Later in July,

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<sup>14</sup> *Id.*

<sup>15</sup> Condé Nast, *About*, CONDÉ NAST, <https://www.condenast.com/about> (last visited July 24, 2025).

<sup>16</sup> *The Costume Institute*.

<sup>17</sup> *Anna Wintour Elected Honorary Trustee*, THE MET (Jan. 12, 1999), <https://www.metmuseum.org/press/news/1999/anna-wintour-elected-honorary-trustee>.

<sup>18</sup> See Amy Odell, *How Anna Wintour Wields Her Power*, TIME (April 25, 2022), <https://time.com/6170179/anna-wintour-met-gala-amy-odell-book/>.

<sup>19</sup> See e.g., Exhibit 1 (declining invitation to the 2019 Met Gala due to prior commitments). The 2020 Met Gala was canceled due to the COVID-19 pandemic. Stuart Emmrich, *There Will Be No Met Gala This Year*, VOGUE (May 19, 2020), <https://www.vogue.com/article/met-gala-has-been-cancelled-2020>.

<sup>20</sup> See e.g., Megan C. Hills, *AOC caused a stir with her statement-making Met Gala gown*, CNN (Sept. 14, 2021), <https://www.cnn.com/style/article/aoc-met-gala-alexandria-ocasio-cortez-dress/index.html>; Stuti Mishra, *AOC hit with ethics complaint over Met Gala appearance as she fires back at critics ‘policing her body’*, INDEPENDENT (Sept. 15, 2021), <https://www.the-independent.com/news/world/americas/us-politics/aoc-met-gala-dress-criticism-b1920415.html#comments-area>.

<sup>21</sup> OCC Referral Exhibit 3.

<sup>22</sup> *Id.* (emphasis in original).

<sup>23</sup> Exhibit 2.

<sup>24</sup> Exhibit 3.

<sup>25</sup> *Id.*

<sup>26</sup> *Our Story*, BROTHER VELLIES, <https://brothervellies.com/pages/about-brother-vellies> (last visited July 24, 2025).

staff at Vogue connected Former Campaign Staffer with Designer.<sup>27</sup> Representative Ocasio-Cortez also agreed to participate in a video for Vogue, which documented the creative process around the design of her look, as well as her getting ready to attend the Met Gala.<sup>28</sup> Prior to attending the event, Representative Ocasio-Cortez also engaged counsel to ensure her attendance was compliant with House Rules.<sup>29</sup>

Although tickets to the Met Gala were sold for \$35,000 each that year, with proceeds benefiting the Met's Costume Institute, Representative Ocasio-Cortez and Mr. Roberts received free admission to the event. Representative Ocasio-Cortez's counsel "reached out to the Metropolitan Museum of Art to confirm that the event met the criteria for a permissible charity event under House [R]ules" as part of their due diligence prior to the event, "and the general counsel of the museum confirmed that it met those criteria."<sup>30</sup> Representative Ocasio-Cortez's counsel thus correctly understood that she could accept the offer of free admission to the event, along with food and beverage, because the invitation was extended by the Met as the charitable sponsor of the event.<sup>31</sup> Counsel also indicated that the "Congresswoman was offered a guest ticket under the same criteria, and her longtime partner attended the event as well."<sup>32</sup>

## **B. Representative Ocasio-Cortez's Related Expenses**

In addition to free admission, Representative Ocasio-Cortez was provided with a designer gown, handbag, shoes, jewelry, and a floral hairpiece, and hair, makeup, transportation, and ready-room services for herself, as well as a bowtie, shoes, and tailoring services for Mr. Roberts. These goods and services were provided, or coordinated, by either Condé Nast or Brother Vellies, both of which primarily communicated with Former Campaign Staffer on Representative Ocasio-Cortez's behalf.

According to Representative Ocasio-Cortez and her counsel, they determined prior to the event that she would be paying for the goods and services received and her "staff explicitly told vendors prior to the Met Gala that the Congresswoman would be paying for many of the benefits provided *personally*."<sup>33</sup> Representative Ocasio-Cortez's staff directed vendors to "keep costs

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<sup>27</sup> OCC Referral Exhibit 6.

<sup>28</sup> Sarah Spellings, *Alexandria Ocasio-Cortez Sent a Message with her First Met Gala Appearance*, VOGUE (Sept. 16, 2021), <https://www.vogue.com/article/alexandria-ocasio-cortez-met-gala-2021>.

<sup>29</sup> OCC Interview of Representative Ocasio-Cortez.

<sup>30</sup> Letter from Counsel to Representative Alexandria Ocasio-Cortez to Tom Rust, Committee on Ethics (July 8, 2022) (Appendix B).

<sup>31</sup> See OCC Referral Exhibit 11. Although Representative Ocasio-Cortez's counsel has indicated that the invitation was extended by the Met, OCC "found significant documentary evidence suggesting that [her] invitation is most appropriately characterized as an invitation from Vogue" and that there may have been "some attempt to obfuscate Vogue's role in the invitation process" by counsel. Nonetheless, OCC found that, even if Vogue invited the congresswoman, her attendance was permissible under the charitable events exception to the Gift Rule because "Vogue is appropriately characterized as an event organizer given the significant and active role it plays in organizing the Met Gala." OCC Referral n. 46; see also OCC Referral Exhibit 14.

<sup>32</sup> OCC Referral Exhibit 11.

<sup>33</sup> Letter from counsel to Representative Alexandria Ocasio-Cortez to Tom Rust, Committee on Ethics (July 8, 2022) (Appendix B) (emphasis in original). See also OCC Interview of Former Campaign Staffer. Documents suggest some ambiguity about the source of payment in the days leading up to the event. See e.g., Exhibit 4 (Sept. 11, 2021, email thread between Condé Nast staff stating, "Getting on a call with AOC and they said that designers can't pay

down” in light of that, although her counsel acknowledged that “it proved to be exceptionally difficult to educate vendors on the ethical requirements that the Congresswoman is subject to,” noting, “multiple occasions where the Congresswoman and her team were met with responses from collaborators and involved companies to the effect of ‘Met Gala attendees don’t normally pay for this.’”<sup>34</sup> Representative Ocasio-Cortez ultimately paid for most of the goods and services received out of personal funds, although the payments were significantly delayed and some payments fell short of fair market value. Most payments occurred after OCC initiated its review, “[b]ut for” which, OCC stated “it appears that [she] may not have paid for several thousands of dollars’ worth of goods and services provided to her.”<sup>35</sup> Additional details regarding the goods and services received, the delays in completing payment, and fair market valuation are discussed further below.

### *1. Services Provided or Coordinated by Condé Nast*

Condé Nast assisted with the coordination of hair and makeup services for Representative Ocasio-Cortez related to her attendance at the Met Gala and production of the associated “getting ready” video for Vogue.<sup>36</sup> Both vendors initially billed Condé Nast for their services, but Condé Nast informed them on September 21, 2021—approximately one week after the event—that they had a “small shift on our end with billing and the talent’s team will be handling directly.”<sup>37</sup> Former Campaign Staffer was identified as the point of contact for Representative Ocasio-Cortez in both instances.<sup>38</sup> As discussed in further detail below, both vendors were unable to collect payment on their invoices until months after the event and after repeated attempts at collection.

Condé Nast also provided Representative Ocasio-Cortez with transportation from her home to The Carlyle hotel, where she got ready for the event. Condé Nast appeared to have initially covered the cost of the transportation but provided Former Campaign Staffer with an invoice for reimbursement after Former Campaign Staffer reached out to them following the initiation of OCC’s review, which the congresswoman paid in May 2022.

#### *a. Hair Styling*

Representative Ocasio-Cortez received hair services for the Met Gala from Hairstylist.<sup>39</sup> The agency representing Hairstylist sent an invoice for \$477.73 to Former Campaign Staffer on September 30, 2021, per Condé Nast’s instructions.<sup>40</sup> The invoice noted that payment was due by October 30, 2021.<sup>41</sup>

On November 16, 2021, Hairstylist’s agency emailed Former Campaign Staffer about the

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for stuff needs to be a gift.”); OCC Referral Exhibit 10 (Undated text message from Former Campaign Staffer to Designer stating, “I don’t want to do anything that we find out later will need to be a personal expense for her”).

<sup>34</sup> Letter from counsel to Representative Alexandria Ocasio-Cortez to Tom Rust, Committee on Ethics (May 16, 2025) (Appendix B).

<sup>35</sup> OCC Referral at 8.

<sup>36</sup> See OCC Referral Exhibits 16, 20.

<sup>37</sup> OCC Referral Exhibits 16, 20. Representative Ocasio-Cortez was the “talent” referenced.

<sup>38</sup> *Id.*

<sup>39</sup> See OCC Referral Exhibit 16.

<sup>40</sup> *Id.*

<sup>41</sup> *Id.*

past due payment and requested that she provide proof of payment by the end of the week.<sup>42</sup> Former Campaign Staffer did not respond to the email, nor any of the other emails sent by the agency throughout December.<sup>43</sup> After Condé Nast was looped back into communications on the issue in mid-January 2022, the agency noted that Former Campaign Staffer “has never responded to any requests for payment. Obviously it would look terrible if we had to file a complaint with the NY Dept of Labor against Alexandria Ocasio-Cortez for Congress. Do you have an active contact on AOC’s team who will pay for the work done by our artist?”<sup>44</sup> Former Campaign Staffer responded to the email thread on January 26, 2022, and requested a credit card authorization form. The agency provided the form the same day, but Former Campaign Staffer did not complete the payment.<sup>45</sup>

One month later, on February 23, 2022, the agency notified Former Campaign Staffer and Condé Nast that they would be filing a complaint against Alexandria Ocasio-Cortez for Congress if payment was not deposited by the end of business on the following day.<sup>46</sup> Former Campaign Staffer requested a call with Hairstylist’s agency.<sup>47</sup> On February 24, 2022, the invoice was paid<sup>48</sup> from Representative Ocasio-Cortez’s personal funds.<sup>49</sup>

Former Campaign Staffer advised OCC that “on one level [the payment] did fall off my radar and I think I remember getting e-mails from them usually when I was somewhere else where I couldn’t [] be at my laptop and focus on it.”<sup>50</sup> She also noted that there were some logistical issues in completing the payment.<sup>51</sup> The Committee did not receive any evidence that Representative Ocasio-Cortez was personally made aware of the communications from Hairstylist’s agency regarding the late payment. Representative Ocasio-Cortez testified to OCC that she was not aware at the time how each good or service was to be billed and believed that they would perhaps be reimbursing Brother Vellies for all costs:

So I didn't know in terms of how it was structured if we were paying each vendor individually, if it was Brother Vellies covering the cost and then us -- you know, of all of these things because we hadn't shared, or, you know, same provider, same vendor and that we were reimbursing them. I also was under the impression it was the latter, that we were reimbursing Brother Vellies for the cost, but I really did not know the details at the time of how things were itemized.<sup>52</sup>

#### b. Makeup Services

Representative Ocasio-Cortez received makeup services for the Met Gala from Makeup

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<sup>42</sup> OCC Referral Exhibit 17.

<sup>43</sup> *Id.*

<sup>44</sup> *Id.*

<sup>45</sup> *See id.*

<sup>46</sup> *Id.*

<sup>47</sup> *Id.*

<sup>48</sup> OCC Referral Exhibit 18.

<sup>49</sup> OCC Interview of Representative Ocasio-Cortez.

<sup>50</sup> OCC Interview of Former Campaign Staffer.

<sup>51</sup> *See id.*

<sup>52</sup> OCC Interview of Representative Ocasio-Cortez.

Artist.<sup>53</sup> Several days after the event, on September 17, 2021, the agency that represented Makeup Artist in the transaction invoiced Condé Nast for \$344.85.<sup>54</sup> On September 23, 2021, after receiving instructions from Condé Nast to bill Representative Ocasio-Cortez directly, Makeup Artist's agency asked Former Campaign Staffer to provide the correct billing address for the invoice.<sup>55</sup> Former Campaign Staffer did not reply, and there was no further communication between the parties until January 2022.

On January 10, 2022, Makeup Artist's agency emailed Condé Nast another copy of the invoice, indicating that it was outstanding and asking for payment "as soon as possible[.]"<sup>56</sup> On January 13, 2022, Condé Nast rejected the invoice noting that it was "[t]o be paid out by AOC team."<sup>57</sup> The notification also provided Former Campaign Staffer's email address. Former Campaign Staffer replied to further inquiry from the agency and advised them that "we are taking care of it, and apologies-this should have been taken care of a while ago."<sup>58</sup> However, by January 25, 2022, Makeup Artist had still not received payment, and the agency again followed up with Former Campaign Staffer, who did not respond.<sup>59</sup>

Makeup Artist's agency followed up again on February 7, 2022, and noted that the "invoice is still outstanding and EXTREMELY overdue."<sup>60</sup> Former Campaign Staffer did not respond. On February 11, 2022, the agency emailed Former Campaign Staffer again and asked if the invoice needed to be reissued to a different party so that it could be paid.<sup>61</sup> Former Campaign Staffer apologized and indicated that they believed payment had already been made, but that they would issue payment the following business day.<sup>62</sup> The agency reached out to Former Campaign Staffer three more times in February after not receiving payment.<sup>63</sup> On February 24, 2022, Former Campaign Staffer indicated to the agency that payment had been completed.<sup>64</sup> However, the agency informed her the following day that the payment had been rejected.<sup>65</sup> The invoice was not successfully paid until March 16, 2022, approximately two weeks after the congresswoman and her team were informed of OCC's review.<sup>66</sup> The invoice was paid from Representative Ocasio-Cortez's personal funds.<sup>67</sup>

Former Campaign Staffer indicated to OCC that the delayed payment to Makeup Artist's agency was due in part to issues in completing the payment with the vendor and because "other things kind of took precedence[.]"<sup>68</sup> The Committee did not receive any evidence that

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<sup>53</sup> OCC Referral Exhibit 19.

<sup>54</sup> *Id.*

<sup>55</sup> OCC Referral Exhibit 20

<sup>56</sup> OCC Referral Exhibit 21.

<sup>57</sup> *Id.*

<sup>58</sup> *Id.*

<sup>59</sup> *Id.*

<sup>60</sup> *Id.*

<sup>61</sup> *Id.*

<sup>62</sup> *See* OCC Referral Exhibit 21.

<sup>63</sup> *Id.*

<sup>64</sup> OCC Referral Exhibit 22.

<sup>65</sup> *Id.*

<sup>66</sup> OCC Referral Exhibit 23.

<sup>67</sup> OCC Interview of Representative Ocasio-Cortez.

<sup>68</sup> OCC Interview of Former Campaign Staffer.

Representative Ocasio-Cortez was personally made aware of the communications from Makeup Artist’s agency regarding the late payment. As noted above, Representative Ocasio-Cortez indicated she was under the impression that Brother Vellies had paid the vendors and that she would be reimbursing Brother Vellies.

c. Transportation to The Carlyle

Condé Nast coordinated transportation for Representative Ocasio-Cortez from her home to The Carlyle (where she got ready for the Met Gala). Two days prior to the event, individuals at Condé Nast initially discussed renting a sprinter van, as “AOC team asked if we could have one that will transport crew and AOC from location to location and then to the [hotel] and then to The Met.”<sup>69</sup> However, after estimating the van’s potential cost, individuals at Condé Nast instead internally proposed renting two SUVs in an attempt to “make it slightly more cost effective.”<sup>70</sup> In a later response to the same email thread, Condé Nast staff said: “Getting on a call with AOC and they said that designers can’t pay for stuff[, it] needs to be a gift. So just double checking.”<sup>71</sup> There is no indication that Condé Nast provided Representative Ocasio-Cortez, or anyone on her team, with an invoice for the transportation costs until after OCC initiated its review.

On March 16, 2022, approximately two weeks after OCC notified Representative Ocasio-Cortez of its review, Former Campaign Staffer was in contact with Condé Nast regarding transportation costs.<sup>72</sup> Condé Nast provided a receipt showing that the total transportation cost was \$586.84.<sup>73</sup> However, because there were four riders—three of whom were Vogue crew members—Condé Nast suggested that it might be appropriate to divide the hourly rate between the four individuals.<sup>74</sup> Former Campaign Staffer replied, “Can we get an invoice for \$180? We can split this evenly.”<sup>75</sup> An invoice in that amount was provided to Former Campaign Staffer the following day on March 17, 2022.<sup>76</sup> The invoice was paid in full almost two months later, on May 10, 2022,<sup>77</sup> from Representative Ocasio-Cortez’s personal funds.<sup>78</sup>

2. *Goods and Services Provided or Coordinated by Brother Vellies*

Brother Vellies either directly provided or coordinated the other goods and services received by the congresswoman and Mr. Roberts related to their Met Gala attendance. Specifically, Representative Ocasio-Cortez was provided with a gown, handbag, shoes, jewelry, and a floral hairpiece, and ready-room services for herself, and a bowtie, shoes, and tailoring services for Mr. Roberts.

As discussed further below, Representative Ocasio-Cortez and her team were provided

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<sup>69</sup> Exhibit 5.

<sup>70</sup> *Id.*

<sup>71</sup> Exhibit 4.

<sup>72</sup> OCC Referral Exhibit 34.

<sup>73</sup> *Id.*

<sup>74</sup> *Id.*

<sup>75</sup> *Id.*

<sup>76</sup> *Id.*

<sup>77</sup> OCC Referral Exhibit 35.

<sup>78</sup> OCC Interview of Representative Ocasio-Cortez.

with multiple invoices from Brother Vellies which accounted for most, but not all, goods and services received in connection with the Met Gala. Complete payment to Brother Vellies for the invoiced costs did not occur until May 10, 2022, nearly eight months after the event. During its review, the Committee received information indicating that the invoiced costs did not reflect the fair market value of the goods and services provided.

a. Custom Designs by Brother Vellies

The gown, handbag, and shoes were all designed specifically in contemplation of Representative Ocasio-Cortez's Met Gala appearance, although some iterations of the handbag and shoes were later sold at retail.<sup>79</sup> Representative Ocasio-Cortez, through Former Campaign Staffer and her counsel, communicated to Brother Vellies at the outset that costs should be kept down, although the Committee's record suggests that no specific budget number was discussed.<sup>80</sup>

Nonetheless, the record shows that Designer, and a team of subcontractors, spent considerable time and effort in creating custom apparel for the congresswoman's Met Gala appearance. This process included drafting numerous sketches of possible gown designs<sup>81</sup> that were then narrowed down in lookbooks presented to Representative Ocasio-Cortez (through Former Campaign Staffer) seeking her feedback.<sup>82</sup> Designer also sought out Artist for paper flowers to be included in the design of "a pair of custom shoes[.]"<sup>83</sup> When asked about the budget for the shoes by another individual, Designer indicated "I don't know really. We are making 10 shoe options, th[e paper flowers are] for one."<sup>84</sup>

b. Invoices

On September 19, 2021, Publicist—who was associated with Designer and Brother Vellies—provided Former Campaign Staffer with an itemized invoice for rental of the gown and handbag, as well as purchase of the shoes, in the amount of \$2,283.93.<sup>85</sup>

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<sup>79</sup> See OCC Referral Exhibits 24, 25; see also *Nile Bag in Checkers*, BROTHER VELLIES, <https://brothervellies.com/collections/bags/products/checkers-nile-handbag> (retailing at \$1,195 and noting that "Several customized versions were worn at the 2021 MET Gala.") (last visited July 24, 2025).

<sup>80</sup> See 18(a) Interview of Designer (Designer noted that Representative Ocasio-Cortez's counsel asked her to "keep a record," but when asked "a record of what," she responded, "I don't really remember." She then explained, "it was supposed to stay, like, cheap. Q: Okay. Was there discussion of a specific budget? A: I don't remember. Q: 'Cheap' means different things to different people. Do you have any sense of what that meant in this case? A: I don't remember. I just remember, like, trying to keep it affordable.").

<sup>81</sup> See e.g., Exhibit 6.

<sup>82</sup> See e.g., Exhibit 7.

<sup>83</sup> Exhibit 8.

<sup>84</sup> *Id.* See also Exhibit 9 (noting multiple shoe and handbag design options produced for Representative Ocasio-Cortez).

<sup>85</sup> OCC Referral Exhibit 28.

DESCRIPTION	AMOUNT
Met Gala Gown Rental – September 13, 2021	\$1,300.00
Met Gala Handbag Rental – September 31, 2021	\$ 170.00
Met Gala Shoe Purchase - Ribbon Pump	\$ 635.00
Sales Tax 8.5%	\$ 178.93
Total	\$2,283.93

The following day, on September 20, 2021, another invoice was provided to Former Campaign Staffer, but with a reduced total amount of \$990.76.<sup>86</sup> A jewelry rental had been added to the invoice, but the prices listed for the gown and shoes decreased significantly from \$1,300 to \$300 and \$635 to \$160, respectively.

DESCRIPTION	AMOUNT
Met Gala Gown Rental – September 13, 2021	\$ 300.00
Met Gala Handbag & Jewelry Rental – September 31, 2021	\$ 450.00
Met Gala Shoe Purchase - Ribbon Pump	\$ 160.00
Sales Tax 8.875%	\$ 80.76
Total	\$ 990.76

When asked about the revisions, Former Campaign Staffer advised OCC that she spoke to Publicist after receiving the first invoice because she noted some issues that she wanted to address.<sup>87</sup> Specifically, Former Campaign Staffer told OCC that prior to the event, they had discussed the attire totaling around one thousand dollars.<sup>88</sup> Additionally, Former Campaign Staffer’s understanding was that the shoes were to be a rental, rather than purchase as indicated in the invoice, because Brother Vellies intended to use the shoes in other photo shoots.<sup>89</sup> Because of these discrepancies, Former Campaign Staffer said that she wanted to confirm the bill’s overall accuracy.<sup>90</sup>

Although Former Campaign Staffer indicated that the price of the shoes was lowered to reflect that they were a rental, the description in the revised invoice still indicated an intent to purchase the shoes. The Committee found evidence that the originally quoted price of \$635 was a figure provided by Designer to Brother Vellies’ then-accountant, when he asked Designer what she thought the fair market value would be for the shoes.<sup>91</sup> When asked to confirm whether the shoes were in fact returned to Brother Vellies after the event, counsel for Representative Ocasio-Cortez indicated to the Committee that the “shoes were returned September 15, 2021 (two days after the Met Gala), in good condition (worn once).”<sup>92</sup> However, other evidence collected by the Committee suggests that the return did not occur on the date provided by counsel and that there was some intention to purchase the shoes—or at least confusion between the parties around this

<sup>86</sup> OCC Referral Exhibit 29.

<sup>87</sup> OCC Interview of Former Campaign Staffer.

<sup>88</sup> *Id.*

<sup>89</sup> *Id.*

<sup>90</sup> *Id.*

<sup>91</sup> Exhibit 10.

<sup>92</sup> Letter from counsel to Representative Alexandria Ocasio-Cortez to Tom Rust, Committee on Ethics (July 29, 2024) (Appendix B).



point—in the weeks following the event.

For example, two days after the alleged return of the shoes, Representative Ocasio-Cortez’s counsel responded to proactive outreach from Committee staff asking counsel if “your client had any questions for us about the ethics rules and how they apply to events like the Met Gala”—“something we commonly do, particularly when there has been a high profile matter and we don’t have a record of the office seeking the Committee’s guidance on the issues involved”; in that response, counsel asserted in relevant part that “the Congresswoman is paying personally for all other benefits, including the rental value of her dress, handbag, and accessories, as well as the **full value for the shoes worn.**”<sup>93</sup> In addition, on September 18, 2021, correspondence between Condé Nast and Publicist noted that “the pumps that were worn by AOC haven’t been returned yet.”<sup>94</sup> Publicist replied: “The plan is for [Representative Ocasio-Cortez] to keep the shoes since she can’t rent them. She is planning to pay in full.”<sup>95</sup>

An invoice produced to OCC also indicates that a courier delivery to Brother Vellies was not scheduled until September 21, nearly a week after the Committee’s September 15 outreach (and the date counsel asserts that the return occurred).<sup>96</sup> The timing of the delivery was also corroborated by correspondence between Publicist and Condé Nast. In reply to the previously discussed email thread about return of the shoes, Publicist informed Condé Nast on September 27, 2021, that “[t]hey returned the dress last week but I know she wanted to keep the shoes. I can help track them down if there is still a need.”<sup>97</sup> The Committee could not definitively establish that the shoes were also included in the delivery (or perhaps returned at a later date), but Representative Ocasio-Cortez’s counsel represented that the congresswoman “no longer has the shoes, and is unaware as to what may have happened to them after they were sent back with the courier.”<sup>98</sup>

OCC also asked Former Campaign Staffer why the rental value of the gown was reduced from \$1,300 to \$300 after she spoke to Publicist, but Former Campaign Staffer said that she did not know.<sup>99</sup> OCC attempted to discuss these invoices (and other matters) with Designer and Publicist, but they did not agree to interviews; Designer and Publicist did, however, participate in voluntary interviews with the Committee.

Designer informed the Committee that she had no knowledge about the prices included in the invoices nor why they might have been changed.<sup>100</sup> However, Publicist recalled that Former Campaign Staffer asked for the costs provided in the original invoice to be lowered and suggested specific prices that were “[s]ignificantly lower numbers.”<sup>101</sup> Publicist stated that she was “given guidance to adjust things as needed”<sup>102</sup> by Former Campaign Staffer and that there was some back

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<sup>93</sup> OCC Referral Exhibit 11 (emphasis added).

<sup>94</sup> Exhibit 11.

<sup>95</sup> *Id.*

<sup>96</sup> Exhibit 12. Other documentation shows that the courier invoice was paid by the campaign.

<sup>97</sup> Exhibit 13.

<sup>98</sup> Email from counsel to Representative Alexandria Ocasio-Cortez to Committee staff, Committee on Ethics (Sept. 30, 2024) (Appendix B).

<sup>99</sup> OCC Interview of Former Campaign Staffer.

<sup>100</sup> See 18(a) Interview of Designer.

<sup>101</sup> 18(a) Interview of Publicist.

<sup>102</sup> *Id.*

and forth between the teams to determine the pricing:

I mean, we would go back and forth on comparing items to what she saw on Rent the Runway, and that was a big comparison for [Former Campaign Staffer], which, you know, could be a little offensive if I was [Designer]. Like, stuff is not intended to be on Rent the Runway. This is very different, very different.<sup>103</sup>

Brother Vellies' then-accountant similarly testified that Representative Ocasio-Cortez's staff was part of a discussion prior to the event about valuing the dress compared to services like Rent the Runway.<sup>104</sup> Former Campaign Staffer denied requesting the prices to be lowered, stating that she "only asked that they confirm that [the invoice] was correct."<sup>105</sup> She also denied that she indicated to Publicist that she would have expected the gown's rental cost to be lower than the original quote based on a comparison to rentals featured on Rent the Runway.<sup>106</sup>

Although the revised Brother Vellies invoice was provided to Former Campaign Staffer in September 2021, payment was not made until the following year. Former Campaign Staffer told OCC that payment was not made at that time because she "didn't consider it the final invoice because I knew we still had to work through the hotel and so I did not treat it as a final invoice."<sup>107</sup> She similarly informed the Committee that she "would share with [Representative Ocasio-Cortez] that I got an invoice from [Brother Vellies], that there were corrections [that] needed to be made, and that we understood that it wasn't the full scope of what we would need to pay out to Brother Vellies."<sup>108</sup>

However, Publicist did contact Former Campaign Staffer about collecting payment on the invoice in October 2021. Specifically, on October 4, 2021, Publicist wrote to Former Campaign Staffer, "hi stranger! bumping this as we have yet to receive payment. how are you doing over there?" Former Campaign Staffer replied, "Trying! Is my answer to both of your questions :D"<sup>109</sup> The following day, Publicist contacted Former Campaign Staffer again asking her to "keep me posted on that invoice so we can close that work out."<sup>110</sup> There was no further correspondence regarding payment until after OCC initiated its review.

On March 3, 2022, two days after OCC provided notice of its review to Representative Ocasio-Cortez, Former Campaign Staffer emailed Publicist "to collect payment confirmation to process for the Congresswoman and to 'close the books' so to speak for the event."<sup>111</sup> On March 7, 2022, Publicist responded that "finance is saying they never received the payment via invoice sent. Can you confirm when/how payment was made?"<sup>112</sup> Former Campaign Staffer indicated

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<sup>103</sup> *Id.*

<sup>104</sup> 18(a) Interview of Former Accountant.

<sup>105</sup> 18(a) Interview of Former Campaign Staffer.

<sup>106</sup> *Id.*

<sup>107</sup> OCC Interview of Former Campaign Staffer.

<sup>108</sup> 18(a) Interview of Former Campaign Staffer.

<sup>109</sup> Exhibit 14.

<sup>110</sup> Exhibit 15.

<sup>111</sup> OCC Referral Exhibit 30.

<sup>112</sup> *Id.*

that they would “have to take care of this asap.”<sup>113</sup> The invoice was paid in full on March 9, 2022.<sup>114</sup>

On April 15, 2022, counsel for Brother Vellies and Designer contacted Representative Ocasio-Cortez’s counsel in response to their “request for an invoice and supporting documentation for any goods, services or amenities which Representative Ocasio-Cortez and Mr. Riley Roberts may have received from your clients in connection with the September 13, 2021, Met Gala” that were as yet unpaid.<sup>115</sup> In their response, Brother Vellies and Designer’s counsel identified six additional expenses (car service, shared hotel rooms, and Mr. Roberts’ shoes and bow tie) requiring reimbursement in the total amount of \$5,579.99, and provided supporting documentation for the expenses.<sup>116</sup>

- LV Services, Inc. (car service): \$571.59.
- Room 1122 at the Carlyle Hotel on September 12, 2021: \$1,214.61.
- Room 1122 at the Carlyle Hotel on September 13, 2021: \$1,205.04.
- Room 0911 at the Carlyle Hotel on September 13, 2021: \$2,182.67.
- Shoes for Mr. Roberts’ attendance at the Met Gala: \$136.08.
- Bow tie for Mr. Roberts’ attendance at the Met Gala: \$270.00.
- **TOTAL: \$5,579.99.**

The Committee did not receive information about why Brother Vellies did not initially seek repayment for these goods and services. Representative Ocasio-Cortez’s counsel referred to the April 2022 invoice as “new” costs that make clear that “[n]o one appeared to be thinking about the cost of anything, despite the fact that they were told to keep the costs down by the Congresswoman’s staff because the Congresswoman had and has limited financial means.”<sup>117</sup>

The record suggests that Brother Vellies may have been under the impression that the congresswoman did not have to pay fair market value for the shoes and bow tie provided to Mr. Roberts based on a text message exchange with Former Campaign Staffer. Specifically, prior to the event, Former Campaign Staffer sent text messages to Designer stating, “Ah just confirming you’re thinking of providing Riley with a tie/cummerbund? . . . There is no restriction on Riley btw[,]” seemingly in reference to his ability to accept gifts.<sup>118</sup>

On May 10, 2022, the April 2022 invoice was paid in full<sup>119</sup> from Representative Ocasio-Cortez’s personal funds.<sup>120</sup>

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<sup>113</sup> *Id.*

<sup>114</sup> OCC Referral Exhibit 31.

<sup>115</sup> OCC Referral Exhibit 32.

<sup>116</sup> *Id.*

<sup>117</sup> Letter from counsel to Representative Alexandria Ocasio-Cortez to Tom Rust, Committee on Ethics (May 16, 2025) (Appendix B).

<sup>118</sup> Exhibit 16.

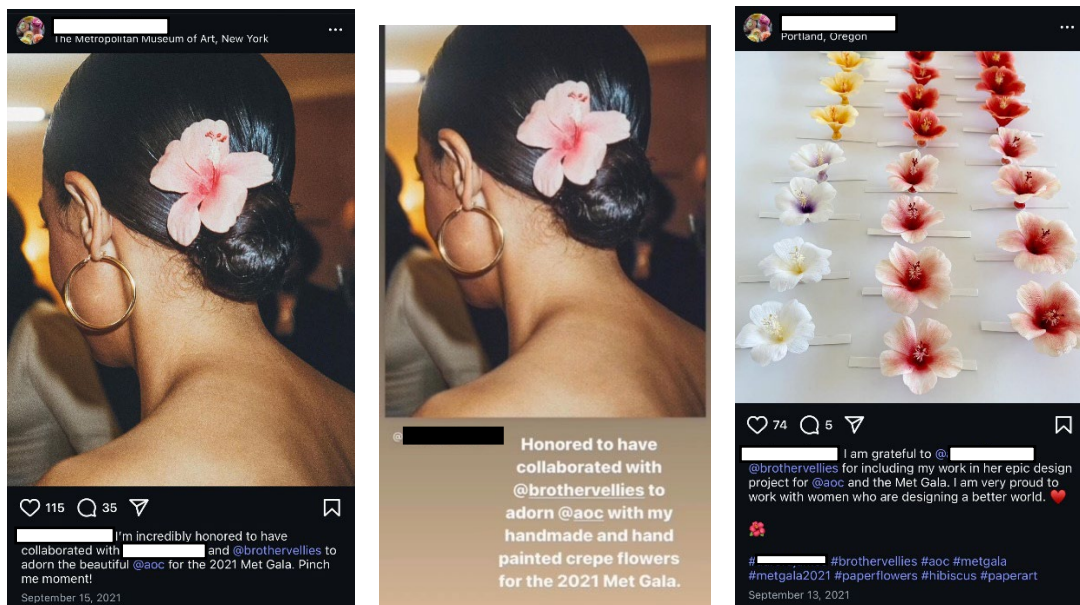
<sup>119</sup> OCC Referral Exhibit 33.

<sup>120</sup> OCC Interview of Representative Ocasio-Cortez.

### c. Additional Expenses

Although Representative Ocasio-Cortez ultimately completed payment on both invoices provided to her by Brother Vellies, two expenditures related to her and Mr. Roberts' Met Gala appearance were not accounted for in the invoices.

First, Representative Ocasio-Cortez was provided with a floral hairpiece by Brother Vellies. When asked about the hairpiece by the Committee, her counsel indicated that the flower “was a live flower without future potential use” so it had not been returned; it was their “impression that the cost of this accessory was covered under either hair [or] makeup vendor[.]”<sup>121</sup> However, counsel provided no information supporting this belief and there is no indication that the accessory was covered under either vendor's invoices. Further, evidence collected by the Committee—including the below social media posts by Artist—suggests that the accessory was not a live flower but rather a “handmade and hand painted crepe flower” made by Artist that matched similar flowers that were incorporated in the shoes designed by Brother Vellies. Documents indicate Brother Vellies paid \$1,000 for 28 “Paper Hibiscus” flowers from Artist.<sup>122</sup> Several of the flowers were incorporated on the shoes that were designed for the occasion, and the hair piece was selected to match the shoes.<sup>123</sup>



Second, Mr. Roberts received additional tailoring services—separate from the Suit Supply

<sup>121</sup> Email from counsel to Representative Alexandria Ocasio-Cortez to Committee staff, Committee on Ethics (Sept. 30, 2024) (Appendix B).

<sup>122</sup> Exhibit 17.

<sup>123</sup> See Jessica Testa, *A.O.C.'s Met Gala Designer Explains Her "Tax the Rich" Dress*, NEW YORK TIMES (Sept. 16, 2021), <https://www.nytimes.com/2021/09/16/style/aoc-designer-tax-the-rich-dress.html> (“There was an artist . . . that I found through a friend who makes these really beautiful flowers out of paper; she created the Flor de Maga, which is the Puerto Rican national flower, for me in the very beginning, and we designed the shoes around the idea of adorning them with that flower.”); see also Brothervellies, INSTAGRAM (Sept. 14, 2021), <https://www.instagram.com/p/CT0GjU3JUqk/>.

tailoring related to his tuxedo purchase—that were coordinated by Designer with assistance from Former Campaign Staffer.<sup>124</sup> When asked by OCC whether Mr. Roberts received these services, Representative Ocasio-Cortez stated: “It never happened, but [Designer] extended that offer [to have his suit tailored], yes.”<sup>125</sup> When later asked the same question by the Committee, Representative Ocasio-Cortez’s counsel stated that “[o]n further discussion between the Congresswoman and Mr. Roberts, she has learned that additional tailoring was done on his tuxedo without her prior knowledge, **that Mr. Roberts paid for personally.**”<sup>126</sup> Counsel also produced a screenshot of a text message indicating that Mr. Roberts received an invoice for \$103 for the alterations from Ignacio’s Tailor.<sup>127</sup> The Committee asked counsel to clarify why Mr. Roberts provided the receipt to Former Campaign Staffer and requested that they provide documentation showing that Mr. Roberts paid for the services personally.<sup>128</sup> In response, counsel indicated that “[a]ccording to Mr. Roberts’ recollection, [Former Campaign Staffer] told him to hold on to receipts related to the Met Gala, so he sent to her for safe keeping, not to seek reimbursement, approval, or the like.”<sup>129</sup> Counsel also provided a bank statement from Mr. Roberts indicating that he withdrew cash to pay for the tailoring services.<sup>130</sup>

#### d. Fair Market Value of Goods and Services

According to Representative Ocasio-Cortez’s counsel, “[t]o ensure that these costs invoiced were the ‘fair market value’ for rental of these items, the congresswoman and her team conducted a separate analysis.”<sup>131</sup> Counsel explained this analysis as follows.

Brother Vellies had indicated to Representative Ocasio-Cortez and her team that “their costs to create the dress and handbag were \$1,000.”<sup>132</sup> The Committee did not receive information about how the \$1,000 cost was conveyed. Based on that figure, counsel calculated a \$3,000 market value for the dress and handbag, explaining that, according to Vogue, the industry standard markup is approximately “2.2 to 2.5 times cost,”<sup>133</sup> but counsel applied “a greater markup [...](of 3 times cost)] given the time [Designer] spent on the dress and handbag, time for fittings, and the like, **and came to a \$3,000 market value.**”<sup>134</sup> “Publicly available data points” were then used to determine the rental cost, including comparisons to Rent the Runway.”<sup>135</sup> Based on this analysis, counsel determined that the anticipated fair market value for rental of the dress and handbag was \$473.94

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<sup>124</sup> Exhibit 18.

<sup>125</sup> OCC Interview of Representative Ocasio-Cortez.

<sup>126</sup> Letter from counsel to Representative Alexandria Ocasio-Cortez to Tom Rust, Committee on Ethics (July 29, 2024) (Appendix B) (emphasis in original).

<sup>127</sup> *Id.*

<sup>128</sup> Email from counsel to Representative Alexandria Ocasio-Cortez to Committee staff, Committee on Ethics (Oct. 15, 2024) (Appendix B).

<sup>129</sup> *Id.* (emphasis removed).

<sup>130</sup> *Id.*

<sup>131</sup> Exhibit 19.

<sup>132</sup> *Id.*

<sup>133</sup> Emily Farra, *What Is the Right Price for Fashion?*, VOGUE (June 29, 2020), <https://www.vogue.com/article/what-is-the-right-price-for-fashion> (“The industry standard for a profit margin is between a 2.2 and 2.5x markup, meaning a dress that cost a designer \$100 to produce might be sold to a retailer for \$220. That retailer has to mark it up by 2.2x again to make its own profit, bringing the final price up to \$484.”).

<sup>134</sup> Exhibit 19 (emphasis in original).

<sup>135</sup> *Id.*

(15.80% of their calculated \$3,000 market value). Calculations for the other items were performed using similar methods:

ITEM	Anticipated FMV Rental Value	Retail Value (at 3x)	Rental/Retail	Assumed Cost of Goods ("COG")	ACTUALLY PAID
Dress	\$473.94	\$3,000.00	15.80%	\$1,000.00	\$ 300.00
Shoes	\$97.16	\$615.00	15.80%	N/A	\$ 160.00
Handbag		(Combined with Dress)			\$ 450.00
Earrings	\$65.89	\$450.00	14.64%	N/A	Combined with Handbag
Ring	\$12.58	\$65.00	19.35%	N/A	
<b>TOTAL</b>	<b>\$649.56</b>				<b>\$ 910.00</b>

Based on these calculations, Representative Ocasio-Cortez’s counsel determined that she was charged and paid “greater than the ‘fair market value’ projections.”<sup>136</sup>

However, the Committee received evidence that the Cost of Goods (COGS) for Brother Vellies to create the dress was \$6,279.10, rather than \$1,000.<sup>137</sup> The invoice indicating the COGS also noted, “**AOC Met Gala Rental Invoice** Per Rent the Runway \$300.”<sup>138</sup> When asked why the dress rental amount invoiced was decreased from \$1,300 to \$300, as discussed above, the former accountant for Designer stated, “I don’t know why there was a reduction [...] this wasn’t me making those decisions; it was them telling me, ‘Here is what should be.’ [...] I presented to them what I had and then they made the decisions off of that.”<sup>139</sup> The accountant also explained that he used the \$300 valuation based on a chiffon gown available on Rent the Runway at the time, which retailed for \$2,280 but was available to rent for \$330.<sup>140</sup> The Committee did not receive any evidence that Representative Ocasio-Cortez or her team received the invoice reflecting the true COGS or otherwise had reason to know the actual design costs until the Committee inquired about the information. When presented with the documents reflecting the \$6,279.10 COGS by the Committee on May 5, 2025, counsel for Representative Ocasio-Cortez asserted that the congresswoman was not aware of these costs and “did not authorize these costs.”<sup>141</sup>

Applying the methodology used by Representative Ocasio-Cortez’s team—multiplying the updated COGS by a markup of 3 times cost (\$6,279.10), the retail value of the dress would be

<sup>136</sup> *Id.*

<sup>137</sup> Exhibit 17.

<sup>138</sup> *Id.* (emphasis in original).

<sup>139</sup> 18(a) Interview of Former Accountant.

<sup>140</sup> Unlike the new, custom-made gown worn by the congresswoman, the comparator gown was a ready-to-wear item and a screenshot taken by the accountant at the time indicates that dozens of renters had previously rented the gown at the time it was renting for \$330.

<sup>141</sup> Letter from counsel to Representative Alexandria Ocasio-Cortez to Tom Rust, Committee on Ethics (May 16, 2025) (Appendix B).

approximately \$18,837.30. Applying the cited rental percentage of the retail value (15.8%) results in a rental value of approximately \$2,976.29.

With respect to the shoes worn to the event, the full fair market value for their purchase would be approximately \$635.<sup>142</sup> As Representative Ocasio-Cortez’s counsel noted, “[t]here is no comparable market for shoe rental to compare prices.”<sup>143</sup>

The retail value of the jewelry listed in counsel’s calculations is consistent with listings on Mejuri’s website for the pieces worn by Representative Ocasio-Cortez.<sup>144</sup>

Finally, a version of the handbag designed in contemplation of Representative Ocasio-Cortez’s Met Gala appearance was later sold by Brother Vellies at retail for \$995. This version did not include the custom “Tax the Rich” slogan featured in the design worn by the congresswoman, but the handbag’s description on the website noted its connection to the one worn at the event.<sup>145</sup> Applying 15.80% to a retail value of \$995 produced an approximate rental value of \$157.21.

## V. FINDINGS

### A. Representative Ocasio-Cortez Impermissibly Accepted Gifts Related to her Attire at the 2021 Met Gala.

Under federal law and House regulations, Members may not accept gifts unless they meet certain requirements; gifts may include any “item having monetary value,” as well as “gifts of services, training, transportation, lodging, and meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.”<sup>146</sup> This prohibition does not apply to anything for which the Member pays the fair market value,<sup>147</sup> which is the item’s retail price, or the reasonable estimate of an item’s cost if it were available for sale.”<sup>148</sup>

As Representative Ocasio-Cortez’s counsel acknowledged, “[t]he Met Gala is primarily an event for celebrities, who are not subject to any legal restrictions on acceptance of gifts and who are routinely given complimentary benefits in connection with their attendance.”<sup>149</sup> Unlike many other attendees at the Met Gala, Representative Ocasio-Cortez, as a Member of Congress, could not accept gifts or loans of goods and/or services associated with her attendance at the event, although her personal attendance at the event otherwise complied with House Rules.

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<sup>142</sup> Exhibit 10; *but see* OCC Referral Exhibit 25 (indicating that a version of the shoes worn by Representative Ocasio-Cortez was later sold at retail for \$795).

<sup>143</sup> Exhibit 19 n.19.

<sup>144</sup> OCC Referral Exhibits 26, 27.

<sup>145</sup> OCC Referral Exhibit 24 (“The Nile Handbag is a beloved lady. She enjoys skirt suits, candlelight dinners, and well thought out plans. And an occasional Met Gala.”).

<sup>146</sup> House Rule XXV, cl. 5(a)(2)(A); *see also* 5 U.S.C. § 7353.

<sup>147</sup> *Id.* at cl. 5(a)(3)(A).

<sup>148</sup> House Gift Guidance.

<sup>149</sup> Letter from counsel to Representative Alexandria Ocasio-Cortez to Tom Rust, Committee on Ethics (May 16, 2025) (Appendix B).

In recognition of that limitation, Representative Ocasio-Cortez proactively took steps to ensure her compliance with the Gift Rule, including by engaging counsel prior to her attendance and by arranging to “rent” her apparel and to pay for various services out of her personal funds. The Committee acknowledges these significant attempts at compliance.

Nonetheless, Representative Ocasio-Cortez’s attempt to apply a retail rental cost to a handmade couture gown was unrealistic.<sup>150</sup> Although Representative Ocasio-Cortez relied on the advice of her counsel and information provided by her staff, and the designer of her attire, to calculate an appropriate rental cost, those calculations did not fully account for the true cost of the unique goods and services she received, or the countervailing incentives of the vendors whose good and services would be showcased.

### *1. Delay in Payments*

As OCC found, while Representative Ocasio-Cortez did ultimately pay for most of the goods and services received, “payment [...] did not occur until after the OC[C] contacted her in connection with [its] review. But for [...] which,] it appears that [she] may not have paid for several thousands of dollars’ worth of goods and services provided to her.”<sup>151</sup> While forbearance may itself constitute a gift, and the Committee has concerns about whether Representative Ocasio-Cortez’s delays in making payments for the goods and services received is itself a violation of the Gift Rule, the Committee did not find any indication that the delays in making payments were intentional or that Representative Ocasio-Cortez was aware of the extent to which they occurred.

Her counsel noted, “[h]owever, the delay in payment by itself is not evidence that the Congresswoman did not intend to pay for personal expenses related to Met Gala, especially given the explicit, documented communications which took place prior to OC[C]’s review that show she did intend to pay, and that her staff was collecting invoices and consulting with Counsel to that effect.”<sup>152</sup> Nonetheless, Representative Ocasio-Cortez stated to OCC that “it is just a deeply regrettable situation” and that she “feel[s] terrible for especially the small businesses that were impacted.”<sup>153</sup>

### *2. Fair Market Value*

With respect to whether Representative Ocasio-Cortez paid fair market value for the goods and services received, the Committee acknowledges that she and her counsel took some steps to determine fair market value. However, these efforts failed to account for the true cost of such unique goods, particularly considering that they were custom-made for the congresswoman and likely had no further use after the event. The Committee agrees with Publicist—the comparison

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<sup>150</sup> See Tahirah Hairston, *Who Pays for Those \$10,000 Met Gala Dresses: Five Designers on the High, Unreimbursed Costs of Dressing a Celebrity for the First Monday in May*, THE CUT (May 5, 2025), <https://www.thecut.com/article/met-gala-costs-designers.html> (noting that “[f]or independent designers, the cost of creating a single custom look can range from \$5,000 to more than \$10,000.”).

<sup>151</sup> OCC Referral at 8.

<sup>152</sup> Letter from counsel to Representative Alexandria Ocasio-Cortez to Tom Rust, Committee on Ethics (July 8, 2022) (Appendix B) (emphasis removed).

<sup>153</sup> OCC Interview of Representative Ocasio-Cortez.



of a one-of-a-kind, custom-made designer gown to those sold commercially and rented to numerous individuals on Rent the Runway is simply inapposite.

Even so, there must be some method by which to determine the rental value of the items received. The Committee finds it appropriate to generally employ the methodology used by Representative Ocasio-Cortez's counsel but with some adjustment and acknowledgement of the difficulty of this endeavor for all parties involved. Thus, using the revised cost of goods provided to the Committee, the Committee finds that the true retail value of the gown designed for Representative Ocasio-Cortez was likely approximately \$18,837.30, and \$2,976.29 would be a more reasonable fair market value for rental of the gown.

With respect to the shoes worn by Representative Ocasio-Cortez, it seems the parties initially intended for the congresswoman to pay full value for purchase of the shoes (\$635). As her counsel previously noted, there is no comparable market for shoe rentals.<sup>154</sup> However, because the Committee did not find evidence that the shoes are still in Representative Ocasio-Cortez's possession, it finds that the \$160 already paid is sufficient fair market value for rental of the shoes.

A version of the handbag designed in contemplation of Representative Ocasio-Cortez's Met Gala appearance was later sold by Brother Vellies at retail for \$995.<sup>155</sup> This version did not include the "Tax the Rich" slogan featured in the design worn by Representative Ocasio-Cortez, but the handbag's description on the website noted its connection to the one worn at the event.<sup>156</sup> Applying the 15.80% retail to rental valuation used by counsel, with the retail value of \$995, produced an approximate rental value of \$157.21. Representative Ocasio-Cortez was initially invoiced \$170 for rental of the handbag. The Committee therefore finds the originally invoiced \$170 to be a reasonable approximation of fair market value.

The Committee accepts counsel's determination of fair market value for rental of the jewelry—totaling \$78.47. As noted above, Representative Ocasio-Cortez was not invoiced for the handmade paper flower that was worn in her hair. Brother Vellies was billed \$1,000 for 28 flowers, so the per flower cost was approximately \$35.71. Accordingly, the Committee finds the below to be an appropriate estimation of the fair market value of the items provided to Representative Ocasio-Cortez by Brother Vellies:<sup>157</sup>

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<sup>154</sup> Exhibit 19. *See also* 18(a) Interview of Publicist (Q. "In your response to him, you wrote that he should also include the price of the shoes, too, since she has to buy them. So why did you say that she needed to buy the shoes?" A. "I am trying to remember. I mean, typically -- again, I am not an expert even on the fashion side, but typically, with shoes, you buy them. You should not be renting. That would be a little nasty to rent shoes.")

<sup>155</sup> OCC Referral Exhibit 24.

<sup>156</sup> *Id.*

<sup>157</sup> The goods and services included in the April 15, 2022, invoice were set at market value and require no additional consideration by the Committee.

<b>Description</b>	<b>Amount Paid</b>	<b>Fair Market Value</b>
Gown Rental	\$300	\$2,976.29
Shoe Rental	\$160	\$160
Handbag Rental	\$450	\$170
Jewelry Rental		\$78.47
Floral Hairpiece	\$0	\$35.71
Sales Tax (8.875%)	\$80.76	\$303.57
	<b>\$990.76</b>	<b>\$3,724.04</b>

Representative Ocasio-Cortez’s counsel asserts that “[i]t would be nonsensical to suggest that the Congresswoman should have been prepared to pay for aspects of items and services that she didn’t know about and didn’t authorize,” and repeatedly invokes the “due diligence” conducted by her team, which “should be worth something.”<sup>158</sup> Indeed, the Committee has considered the efforts made as evidence that the congresswoman did not intend to receive a significant discount on the costs incurred in connection with her Met Gala attendance. Nonetheless, the Committee’s record indicates that the “due diligence,” which was primarily done by Former Campaign Staffer and the same counsel who represented her before the Committee, fell short. Despite counsel’s characterization of the costs at issue as “new,” they are the actual costs incurred by Brother Vellies in the making of a custom-designed gown for an evening on the red carpet.<sup>159</sup> Counsel’s letter references Brother Vellies “discovering” new costs, but the Cost of Goods was not provided to the Committee by Brother Vellies, but instead by the accountant they employed. Acting on the instruction of Brother Vellies, the accountant did indeed generate an invoice that vastly undervalued the apparel. Given the inherent value gained from the exposure of a sitting congresswoman wearing their designs to the Met Gala, it is not surprising that Brother Vellies did not seek the congresswoman’s “authorization” for the gift they provided.

Counsel has asserted that under the Committee’s analysis, there is no level of diligence that could have been done that would have been sufficient but also rejects the argument that the congresswoman “just shouldn’t have gone” to the event.<sup>160</sup> The Committee does not take the position that the congresswoman’s attendance at the event was itself impermissible, nor does it find that she necessarily should have declined the opportunity to be dressed by a professional designer. Once she accepted that opportunity, however, it was unrealistic for her team to communicate a general desire to keep costs down and then develop a price based on inapt comparators and loose quotes from the designer. Counsel asks, “What other due diligence could the Congresswoman and her staff have done before the event that would have satisfied the Committee?” The answer is simple: they could have called the Committee’s staff for assistance.

Representative Ocasio-Cortez has informed the Committee through her counsel that she will pay “amounts directed and invoiced by Brother Vellies for services rendered,” but the burden

<sup>158</sup> Letter from counsel to Representative Alexandria Ocasio-Cortez to Tom Rust, Committee on Ethics (May 16, 2025) (Appendix B).

<sup>159</sup> Counsel similarly described the April 2022 invoice as “new” and “discovered” costs, but those were also actual costs incurred at the time and which Representative Ocasio-Cortez had reason to know existed, as she herself was present in the cars and hotel rooms for which she was later charged.

<sup>160</sup> Letter from counsel to Representative Alexandria Ocasio-Cortez to Tom Rust, Committee on Ethics (May 16, 2025) (Appendix B).

of the House Gift Rule does not fall on those who would seek to *give* the gifts; to suggest otherwise misses the point of the rule, which serves to protect the integrity of the House. Counsel argues that Representative Ocasio-Cortez “cannot and should not be held to verifying the accuracy of those invoices.”<sup>161</sup> While the congresswoman’s ethical obligations do not require her to verify the accuracy of every invoice she receives, they do require her to reject or repay all improper gifts, regardless of whether she solicited them. This obligation is not unique to Representative Ocasio-Cortez, and she is not the first Member to receive a gift without “authorization.”

For example, in 2013, several House Members traveled to a foreign country and found miscellaneous tangible gifts waiting for them in their hotel rooms and received inconsistent answers about the source of the gifts. In that matter, the Committee noted its history of requiring repayment for improper gifts, “even where the Member was initially unaware that they had received an improper gift”; all Members complied with the Committee’s guidance to return the gifts or committed to take the corrective action recommended.<sup>162</sup> The Committee also acknowledged the Members acted in good faith and imposed no sanction, but nonetheless found that repayment was necessary. In another matter reviewed by the Committee around the same time, an investigative subcommittee determined that, due to the “corrosion of evidence over time, it could not recommend a finding that [the Member] purposefully or corruptly accepted any of the gifts” at issue, but that his “state of mind at the time he obtained the gifts did not impact whether he must repay.”<sup>163</sup> In that matter, which involved additional allegations of misuse of campaign funds and tens of thousands of dollars of gifts over several years, the Committee did determine to reprove the Member, noting the “lack of appropriate safeguards and an inattention to the relevant standards of conduct.” Here, the Committee found Representative Ocasio-Cortez’s conduct with respect to the fair market value discrepancy to be more akin to the foreign travelers dealing with a dishonest trip sponsor. However, as discussed further below, some of the actions of her staff, acting under her supervision, exacerbated the situation.

Based on the above, the Committee finds that it would be appropriate for Representative Ocasio-Cortez to remit payment of an additional \$2,733.28 for the goods that she received in connection with her attendance at the 2021 Met Gala to comply with the Gift Rule.<sup>164</sup>

## **B. Representative Ocasio-Cortez Impermissibly Accepted a Gift of Free Admission to the 2021 Met Gala for her Then-Partner, Riley Roberts.**

OCC found that Representative Ocasio-Cortez’s acceptance of free admission to the Met Gala for her then-partner, Mr. Roberts, was permissible because it “opted to treat a long-term

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<sup>161</sup> Letter from counsel to Representative Alexandria Ocasio-Cortez to Tom Rust, Committee on Ethics (May 16, 2025) (Appendix B).

<sup>162</sup> Comm. on Ethics, *In the Matter of Officially-Connected Travel by House Members to Azerbaijan in 2013*, H. Rept. 114-239, 114th Cong., 1st Sess. 25 (2015).

<sup>163</sup> Comm. on Ethics, *In the Matter of Allegations Relating to Representative Don Young*, H. Rept. 113-487, 113th Cong., 2d Sess. 4 (2014).

<sup>164</sup> The total amount for repayment is based on a highly conservative estimate of the actual value of the goods and services that the congresswoman received. For example, the Committee could reasonably have determined that applying a reduced “rental” value to the retail cost was an undue discount considering the lack of market for custom-made designs (as opposed to ready-to-wear designs). This is even more true for the shoes, for which there is no rental market even for ready-to-wear designs. The Committee also could have considered whether the various designs sketched by Designer and not ultimately used should have been separately valued.

significant other as synonymous with a spouse” which was “[c]onsistent with prior decisions[.]”<sup>165</sup> However, OCC’s decision to treat a long-term significant other as a spouse for purposes of the Gift Rule is not based on any law or precedent then in existence.<sup>166</sup>

Under House Rules and guidance as applied at the time of the event, a Member was only permitted to accept an unsolicited offer of free attendance to a charity fundraising event—such as the Met Gala—for themselves and either a spouse or dependent child.<sup>167</sup> The *Ethics Manual* defines “spouse” as “someone to whom you are legally married.”<sup>168</sup> Representative Ocasio-Cortez’s counsel was also informed of this guidance when Committee staff conducted outreach in the days after the event; counsel was explicitly told that a Member could only accept free attendance for a “spouse,” and that “the Committee has taken a fairly narrow view of who counts as a ‘spouse or dependent child.’”<sup>169</sup> Representative Ocasio-Cortez’s counsel sought no additional clarification.

Representative Ocasio-Cortez’s counsel later informed the Committee that the “Congresswoman chose to follow campaign finance laws [... which] was and is a reasonable and logical conclusion to make, and the Committee should not so brazenly apply guidance limited to other sets of rules in other contexts.”<sup>170</sup> If counsel was unsure what guidance applied to the situation, counsel (or the congresswoman herself) should have contacted the Committee for advice, rather than “choosing” which law to apply. The Committee “takes very seriously its obligation to provide sound and dispassionate advice to the Members of this House” and would have informed Representative Ocasio-Cortez and her counsel that Mr. Roberts did not fit the definition of a “spouse” for purposes of the Charitable Events Exception.<sup>171</sup> Further, acting on the advice of counsel does not excuse a Member from a long-held “duty of reasonable inquiry” and “even if Representative [Ocasio-Cortez] believed h[er] actions were consistent with what the law required, that belief was mistaken, as the Committee would have informed h[er], had [s]he only asked.”<sup>172</sup>

While the Committee has since updated its guidance and now permits the acceptance of an offer for free attendance for any guest—as long as the attendance otherwise complies with the Gift Rule—the Committee may not retroactively apply that guidance to prior conduct.<sup>173</sup> Accordingly, Representative Ocasio-Cortez impermissibly accepted a gift of free admission to the 2021 Met

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<sup>165</sup> OCC Referral n.47.

<sup>166</sup> The Committee also found evidence that Representative Ocasio-Cortez listed Mr. Roberts as her “spouse” on paperwork filed with the House relating to privately sponsored travel, although the two were not legally married at the time of the gifted travel. It is not clear whether these misstatements were made on the advice of counsel; indeed, counsel acknowledged in his May 16, 2025, letter that the Travel Regulations provide that Mr. Roberts was not a “relative” under the applicable regulations. The Committee further notes that at the same time Representative Ocasio-Cortez was seeking to take advantage of exceptions to the Gift Rule only applicable to spouses and/or certain relatives, she was not disclosing Mr. Roberts’ financial interests as is required of Members who are legally married.

<sup>167</sup> House Gift Guidance.

<sup>168</sup> *Ethics Manual* at 39.

<sup>169</sup> OCC Referral Exhibit 11.

<sup>170</sup> Letter from counsel to Representative Alexandria Ocasio-Cortez to Tom Rust, Committee on Ethics (May 16, 2025) (Appendix B).

<sup>171</sup> Comm. on Ethics, *In the Matter of Allegations Relating to Representative David McKinley*, H. Rept. 114-795, 114th Cong., 2d Sess. 18 (2016).

<sup>172</sup> *Id.* at 20-21.

<sup>173</sup> See 2022 Pink Sheet.

Gala for Mr. Roberts, even if she was acting on the advice of her counsel. Per House Gift Guidance, the “value of tickets to charity or political fundraisers is the value of the meal [...] not the ticket’s value.”<sup>174</sup> Therefore, the Committee finds that Representative Ocasio-Cortez should donate the per-person cost for Mr. Roberts’ meal at the gala, which the Met determined to be \$250, to the Costume Institute.<sup>175</sup>

### C. Representative Ocasio-Cortez Failed to Exercise Proper Oversight over Staff

The *Ethics Manual* also warns Members against actions that “may create an appearance of impropriety that may undermine the public’s faith in government.”<sup>176</sup> The Committee has repeatedly cautioned that Members should avoid even the appearance of impropriety, which undermines the public’s confidence in the integrity of government officials.<sup>177</sup>

The Committee found no evidence that Representative Ocasio-Cortez was aware of Former Campaign Staffer’s attempts to lower the congresswoman’s costs with respect to the Met Gala, but those attempts nonetheless occurred. Former Campaign Staffer was also tasked with making payments to the various vendors for the goods and services received by Representative Ocasio-Cortez and Mr. Roberts, and those payments were delayed well beyond the date of the event. In fact, most payments were not made until after repeated attempts at collection from unpaid vendors, threatened legal action, or following the initiation of OCC’s review. While Representative Ocasio-Cortez may not have been fully aware of these issues, she bears ultimate responsibility for their occurrence. Had she more diligently supervised a staffer working on her behalf, she may have identified these issues prior to the initiation of OCC’s review nearly six months after the event. Nonetheless, the Committee acknowledged Representative Ocasio-Cortez’s general good-faith efforts at compliance, as well as her reliance on the actions of her staff and the advice of her counsel, in determining that a sanction is not necessary.

The Committee has previously sanctioned Members in a variety of recent matters, including: where a Member failed to employ appropriate safeguards to prevent a pervasive and years long misappropriation of resources;<sup>178</sup> where a Member was unaware of improper activity

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<sup>174</sup> House Gift Guidance; *Ethics Manual* at 26.

<sup>175</sup> Exhibit 20 (noting that the “goods and services are \$250 per ticket” in response to a request from Representative Ocasio-Cortez’s counsel for the per-person cost of the meal at the event).

<sup>176</sup> *House Ethics Manual* (2008) at 24.

<sup>177</sup> See, e.g., Comm. on Ethics, *In the Matter of Allegations Relating to Representative Cathy McMorris Rodgers*, H. Rept. 116-359, 116th Cong., 1st Sess. 52 (2019) (“Nonetheless, the Committee cautions Representative Rodgers and the whole House community to avoid even the appearance of a conflict of interest when entering into relationships with contractors on behalf of the House.”) (hereinafter *Rodgers*); Comm. on Ethics, *In the Matter of Allegations Relating to Representative Thomas Garrett*, Staff Rept. 115th Cong., 2d Sess. 38 (2019) (“However, Members have a duty to avoid even the appearance of impropriety. When Members accept gifts from their employees, it can lead to an appearance that the Member lacks impartiality and create an environment in which staff attempt to win a Member’s favor not based on their work product or effort, but by offering to perform unofficial favors for or providing gifts to the Member.”); Comm. on Ethics, *In the Matter of Allegations Relating to Representative Luis V. Gutiérrez*, H. Rept. 115-617, 115th Cong., 2d Sess. 31 (2018) (“The Committee has also long cautioned Members that when taking official actions, they must ‘avoid situations in which even an inference might be drawn suggesting improper action.’”) (hereinafter *Gutiérrez*).

<sup>178</sup> *Rodgers*.

but failed to take appropriate steps to address misconduct when it came to light;<sup>179</sup> where a Member engaged in repeated unwanted advances towards a woman who was required to work with him;<sup>180</sup> where a Member was found to have unintentionally used MRA funds in a “substantial, non-technical” violation of House Rules;<sup>181</sup> and where a Member accepted a substantial gift due to inattention to the rules.<sup>182</sup> In other recent matters, however, the Committee has declined to recommend a sanction where it found a violation to have occurred, including: where a Member violated campaign finance restrictions but engaged in good faith efforts to comply, did not seek to unjustly enrich herself, and made required repayments;<sup>183</sup> where a Member showed poor judgment in his official communications, acted in a manner that did not reflect creditably upon the House, but did not intend to violate any laws or rules;<sup>184</sup> and where a Member engaged in an “inadvertent, technical violation” of a House Rule.<sup>185</sup>

Although Representative Ocasio-Cortez failed to exercise proper oversight over a staffer working on her behalf, the Committee did not find evidence that she intended to seek to lower the cost of goods provided to her or to delay payment for those goods and other services received by her and Mr. Roberts. Communications about payments, or the lack thereof, were handled solely by Former Campaign Staffer. Representative Ocasio-Cortez and her counsel also made efforts to ensure her compliance with House Rules and to pay fair market value for the goods and services received. Although their efforts at valuation fell short, and efforts to make appropriate payment were delayed, the Committee nonetheless recognizes that those efforts occurred, and that Representative Ocasio-Cortez sought to act consistently with her ethical requirements as a Member of the House. In light of this, the Committee determined that no sanction was merited, provided Representative Ocasio-Cortez: (1) donates the \$250 value of Mr. Roberts’ Met Gala meal to the Costume Institute and (2) pays Brother Vellies an additional \$2,733.28 for the fair market value of the goods that she received in connection with her 2021 Met Gala attendance.

The Committee also acknowledges Representative Ocasio-Cortez’s general cooperation in the matter. Counsel suggested that Representative Ocasio-Cortez’s cooperation “increased the scrutiny that the Committee has placed on this matter,”<sup>186</sup> but the Committee credits the congresswoman for her participation throughout its review. Most notably, the Committee relied on the transcript of the congresswoman’s testimony to OCC rather than requesting she appear for

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<sup>179</sup> Comm. on Ethics, *In the Matter of Allegations Relating to Representative Mark Meadows*, H. Rept. 115-1042, 115th Cong., 2d Sess. (2018).

<sup>180</sup> Comm. on Ethics, *In the Matter of Allegations Relating to Representative Ruben Kihuen*, H. Rept. 115-1041, 115th Cong., 2d Sess. (2018).

<sup>181</sup> *Gutiérrez* at 29.

<sup>182</sup> Comm. on Ethics, *In the Matter of Allegations Relating to Representative Bobby L. Rush*, H. Rept. 115-618, 115th Cong., 2d Sess. (2018).

<sup>183</sup> Comm. on Ethics, *In the Matter of Allegations Relating to Representative Rashida Tlaib*, H. Rept. 116-473, 116th Cong., 2d Sess. 4 (2020).

<sup>184</sup> Comm. on Ethics, *In the Matter of Allegations Relating to Representative Matt Gaetz*, H. Rept. 116-479, 116th Cong., 2d Sess. (2020) (in that matter, the Committee did determine its report should serve as an admonishment of the Member).

<sup>185</sup> Comm. on Ethics, *In the Matter of Allegations Relating to Representative Ben Ray Lujan*, H. Rept. 115-272, 115th Cong., 1st Sess. (2017).

<sup>186</sup> Letter from counsel to Representative Alexandria Ocasio-Cortez to Tom Rust, Committee on Ethics (May 16, 2025) (Appendix B). Counsel also seemed to suggest that it may not have been an actual coincidence that the Committee sent correspondence to Representative Ocasio-Cortez on the day of the 2025 Met Gala. The Committee generally does not track when the annual Met Gala occurs, and the date was indeed a coincidence.

an additional interview before the Committee. When certain inconsistencies were identified in the OCC testimony, such as Representative Ocasio-Cortez's initial assertion that Mr. Roberts did not receive tailoring services, the Committee provided her with the opportunity to correct the record. While counsel is correct that Committee staff conducted a thorough investigation and "rechecked" OCC's work, such diligence is in no way unique to this matter. The Committee independently reviews all referrals from OCC.

## **VI. CONCLUSION**

The Committee determined that Representative Ocasio-Cortez's conduct was inconsistent with House Rules, laws, and other standards of conduct with respect to her acceptance of certain goods and services associated with her attendance at the 2021 Met Gala, and her delay in making appropriate payment for their receipt. While the Committee did not find that Representative Ocasio-Cortez's violations were knowing and willful, she nonetheless received impermissible gifts and must bear responsibility for the other conduct that occurred with respect to the delays in payment.

The Committee also reminds all House offices that Members and their congressional staff may always seek guidance from the Committee and encourages them to do so proactively, even if they are represented by counsel.

Following the publication of this Report and repayment of the value of the improper gifts, the Committee 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.