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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. 25-7636

The Board of the Office of Congressional Conduct (hereafter “the Board”), by a vote of no less than four members, on September 24, 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 Michael Collins

NATURE OF THE ALLEGED VIOLATION: Rep. Collins may have used congressional resources for unofficial or otherwise unauthorized purposes. If Rep. Collins used congressional resources for unofficial or otherwise unauthorized purposes, then Rep. Collins may have violated federal law, House rules, and standards of conduct.

Rep. Collins may have retained an employee who did not perform duties commensurate with the compensation the employee received. If Rep. Collins retained an employee who did not perform duties commensurate with the compensation the employee received, then Rep. Collins may have violated House rules and standards of conduct.

Rep. Collins may have discriminated unfairly by dispensing special favors or privileges by retaining an employee with whom his Chief of Staff had a personal relationship. If Rep. Collins discriminated unfairly by dispensing special favors or privileges, then Rep. Collins may have violated House rules and standards of conduct.

RECOMMENDATION: The Board recommends that the Committee further review the above allegation concerning Rep. Collins because there is substantial reason to believe that Rep. Collins used congressional resources for unofficial or otherwise unauthorized purposes.

The Board recommends that the Committee further review the above allegation concerning Rep. Collins because there is substantial reason to believe that Rep. Collins retained an employee who did not perform duties commensurate with the compensation the employee received.

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The Board recommends that the Committee further review the above allegation concerning Rep. Collins because there is substantial reason to believe that Rep. Collins discriminated unfairly by dispensing special favors or privileges by retaining an employee with whom his Chief of Staff had a personal relationship.

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.

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FINDINGS OF FACT AND CITATIONS TO LAW

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UNITED STATES HOUSE OF REPRESENTATIVES

FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 25-7636

On September 24, 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. Collins may have used congressional resources for unofficial or otherwise unauthorized purposes. If Rep. Collins used congressional resources for unofficial or otherwise unauthorized purposes, then Rep. Collins may have violated federal law, House rules, and standards of conduct.
2. Rep. Collins may have retained an employee who did not perform duties commensurate with the compensation the employee received. If Rep. Collins retained an employee who did not perform duties commensurate with the compensation the employee received, then Rep. Collins may have violated House rules and standards of conduct.
3. Rep. Collins may have discriminated unfairly by dispensing special favors or privileges by retaining an employee with whom his Chief of Staff had a personal relationship. If Rep. Collins discriminated unfairly by dispensing special favors or privileges, then Rep. Collins may have violated House rules and standards of conduct.
4. The Board recommends that the Committee further review the above allegation concerning Rep. Collins because there is substantial reason to believe that Rep. Collins used congressional resources for unofficial or otherwise unauthorized purposes.
5. The Board recommends that the Committee further review the above allegation concerning Rep. Collins because there is substantial reason to believe that Rep. Collins retained an employee who did not perform duties commensurate with the compensation the employee received.
6. The Board recommends that the Committee further review the above allegation concerning Rep. Collins because there is substantial reason to believe that Rep. Collins discriminated unfairly by dispensing special favors or privileges by retaining an employee with whom his Chief of Staff had a personal relationship.

B. Jurisdictional Statement

7. The allegations that were the subject of this review concern Rep. Collins, a Member of the United States House of Representatives from the 10th Congressional District of Georgia. The Resolution the United States House of Representatives adopted creating the Office of

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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

8. 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
9. On May 27, 2025, the OCC notified Rep. Collins of the initiation of the preliminary review, provided him with a statement of the nature of the review, notified him of his right to be represented by counsel in this matter, and notified him that invoking his right to counsel would not be held negatively against him.³
10. 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.
11. On June 23, 2025, the OCC notified Rep. Collins of the initiation of the second-phase review in this matter, and again notified him of his right to be represented by counsel in this matter, and that invoking that right would not be held negatively against him.⁵
12. 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.
13. The Board voted to refer the matter to the Committee for further review and adopted these findings on September 24, 2025.
14. The report and its findings in this matter were transmitted to the Committee on October 7, 2025.
15. In parallel with its review of this matter, the OCC Board initiated a distinct but factually congruent review focused on the same general allegations as they pertain to Brandon Phillips, Rep. Collins’s Chief of Staff.⁶ Although the two reviews commenced on the same date, involved the same facts, witnesses and many of the same legal issues, and terminated on the same date, separate reviews were conducted in recognition of the fact that the allegations

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.

³ Letter from Omar S. Ashmawy, Chief Counsel and Staff Dir., Office of Cong. Conduct, to Rep. Collins (May 27, 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. Collins (June 23, 2025).

⁶ The review of which Brandon Phillips was the subject was designated OCC Rev. No. 25-7735.

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended received by the OCC Board—if substantiated—involved potential violations of law, House rules, and standards of conduct by both Rep. Collins and Mr. Phillips.

D. Summary of Investigative Activity

16. The OCC requested documentary and/or testimonial information from the following sources:

- (1) Rep. Michael Collins;
- (2) Brandon Phillips, current Chief of Staff for Rep. Collins;⁷
- (3) Kevin Mason, current District Director for Rep. Collins;
- (4) John Ferland, former Financial Administrator in the Office of Rep. Collins;⁸
- (5) Monica Burton, former Financial Assistant in the Office of Rep. Collins;⁹
- (6) The Chief Administrative Officer of the House of Representatives;
- (7) Witness 1;
- (8) Witness 2;
- (9) Witness 3;
- (10) Witness 4;
- (11) Witness 5;
- (12) Witness 6; and
- (13) Witness 7.

17. The following individuals refused to cooperate with the OCC’s review:

- (1) Rep. Michael Collins;
- (2) Brandon Phillips;
- (3) Kevin Mason;
- (4) John Ferland; and
- (5) Monica Burton.

18. The OCC Board notes that several witnesses—including current and former House staffers—expressed to the OCC concerns about possible retaliation for their cooperation with this review. Those concerns ranged from moderate concern about professional repercussions to strong fear of personal retaliation from Brandon Phillips, Rep. Collins’s Chief of Staff. Multiple witnesses told the OCC that their fears of retaliation from Mr. Phillips stemmed at least in part from their awareness of public reporting of past violent criminal behavior by Mr. Phillips.¹⁰ The OCC Board and staff take the concerns of those witnesses seriously. In light

⁷ Pursuant to OCC Rev. No. 25-7735, the OCC sought essentially the same information from Mr. Phillips that it sought from Rep. Collins in connection with this review.

⁸ Interview Transcript of Witness 3, July 25, 2025 (“Witness 3 Transcript”) at 15:13-14. The Statement of Disbursements of the House for the fourth quarter of 2024 lists John O. Ferland as a “Shared Employee” who was paid by Rep. Collins’s Office. *See* Statement of Disbursements of the House (October 1, 2024, to December 31, 2024) at p.754.

⁹ Interview Transcript of Witness 1, July 24, 2025 (“Witness 1 Transcript”) at 31:14-15. The Statement of Disbursements of the House for the fourth quarter of 2024 lists Monica L. Burton as a “Shared Employee” who was paid by Rep. Collins’s Office. *See* Statement of Disbursements of the House (October 1, 2024, to December 31, 2024) at p.753.

¹⁰ *See, e.g.,* Daniel Lippman, *GOP operative who allegedly kicked a dog hired as top aide to new congressman*, POLITICO, <https://www.politico.com/news/2022/12/13/gop-operative-brandon-phillips-00073724> (“A veteran

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended of concerns about retaliation, the OCC has taken measures to anonymize cooperating witnesses in this Referral and Supporting Documentation.

II. REP. COLLINS’S OFFICE APPEARS TO HAVE HIRED AND PAID A DISTRICT INTERN WHO HAD A PREEXISTING PERSONAL ROMANTIC RELATIONSHIP WITH THE OFFICE CHIEF OF STAFF AND WHO DID NOT PERFORM DUTIES COMMENSURATE WITH HER COMPENSATION.

A. Applicable Law, Rules, and Standards of Conduct

19. Federal Statutes

Title 2 U.S.C. § 5341(a) states that “[t]here is established for the House of Representatives a single allowance, to be known as the ‘Members’ Representational Allowance’, which shall be available to support the conduct of the official and representational duties of a Member of the House of Representatives with respect to the district from which the Member is elected.”

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

20. House Rules

House Rule 23, cl. 1 provides, “A Member ... or employee of the House shall behave at all times in a manner that shall reflect creditably on the House.”¹¹

House Rule 23, cl. 8(a) provides, “[a] Member ... or officer of the House may not retain an employee who does not perform duties for the offices of the employing authority commensurate with the compensation such employee receives.”¹²

21. House Ethics Manual

The House Ethics Manual explains generally that

official resources of the House must, as a general rule, be used for the performance of official business of the House, and hence those resources may not be used for

Georgia Republican operative who is slated to be chief of staff for incoming Rep. Mike Collins was arrested last month for allegedly kicking a dog.”); Richard Elliot, *Donald Trump’s Georgia campaign executive director resigns*, WSB-TV 2 ATLANTA, <https://www.wsbtv.com/news/politics/trumps-executive-director-admits-to-destroying-laptop-slashing-tires/451064406/> (noting that Mr. Phillips “was arrested in 2008” ... “on battery and felony criminal damage” charges for “intentionally damag[ing] the property of (someone)” and “caus[ing] visible bodily harm to wit: cuts and bruises to the head and torso of (someone),”—but “before the case went to trial, ... [Mr.] Phillips agreed to plead guilty to the lesser charges of criminal trespassing and battery.”); Kristen Reed, Ryan Kruger, *Ex-Trump campaign director in Georgia has violent past*, 11 ALIVE, <https://www.11alive.com/article/news/local/ex-trump-campaign-director-in-georgia-has-violent-past/85-327423276> (“In November 2008, police were called to his Atlanta home after pulling a gun on a woman. When police arrived, he told them he pointed to gun at the caller after hearing someone bang on his front door. ... A few weeks later, he was arrested and charged with simple assault and battery. The charges in that case were dead docketed, a legal term where the charges are essentially put on hold, after Phillips went through pre-trial counseling.”).

¹¹ House Rule XXIII, cl. 1.

¹² House Rule XXIII, cl. 8(a).

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campaign or political purposes. The laws and rules referenced in this section reflect “the basic principle that government funds should not be spent to help incumbents gain reelection.”

What are the “official resources” to which this basic rule applies? Certainly the funds appropriated for Member, committee, and other House offices are official resources, as are the goods and services purchased with those funds.

...

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.¹³

Further, the House Ethics Manual notes:

Goods and Services Paid for With the Members’ Representational Allowance or House Committee Funds. All expenditures by a Member from his or her Members’ Representational Allowance (‘MRA’) – including expenditures for staff, travel, and communications – must comply with regulations issued by the Committee on House Administration. Those regulations are set forth in the Members’ Handbook issued by that Committee. The Handbook provides that “[o]nly expenses the primary purpose of which [is] official and representational” are reimbursable from the MRA, and that the MRA may not pay for campaign expenses or political expenses (or any personal expenses).”¹⁴

The House Ethics Manual states, with respect to compensation of any employee of the House:

The regulations of the Committee on House Administration require employing Members to provide monthly salary certifications for their staff. A salary may be disbursed to an employee only upon submission of a signed statement by the appropriate Member certifying that the Office of Human Resources has correctly listed the name and salary of each employee, and that the employees have certified that they have no relationship to any current Member of Congress, unless

¹³ House Committee on Ethics, House Ethics Manual (2022 Print) (hereinafter “House Ethics Manual”), at 133-34 (internal citations omitted).

¹⁴ *Id.* at 135 (internal citations omitted).

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specifically noted. Compensation may be received only for duties performed within the preceding month.

The Ethics Reform Act of 1989 amended what is now House Rule 23, clause 8, “to strengthen and broaden [Members’ and officers’] accountability for the pay and performance of staff.”

...

The underlying standard for the receipt of compensation by an employee of the House is that the employee has regularly performed official duties commensurate with the compensation received. The Code of Ethics for Government Service instructs every employee to “[g]ive a full day’s labor for a full day’s pay; giving to the performance of his duties his earnest effort and best thought.” Employees are paid United States Treasury funds to perform public duties. ... Funds appropriated for congressional staff to perform official duties should be used only for assisting a Member in his or her legislative and representational duties, working on committee business, or performing other congressional functions.¹⁵

...

Standards Committee Actions. *In one case considered by the Standards Committee in the 100th Congress, involving the misuse of clerk hire funds, the Committee found that a Member maintained an employee on the payroll of a subcommittee the Member chaired, while knowing that the employee was not coming to work. The House reprimanded the Member for, among other things, violating the Code of Official Conduct (currently clause 8 of House Rule 23).¹⁶*

...

Court Actions. *The Department of Justice has on four separate occasions pursued criminal charges, against two then-current and two former Members of the House, for allegedly placing persons on the congressional payroll who did not regularly perform official congressional duties but rather performed personal services or duties for or on behalf of the Members. The charges included fraud, mail fraud, perjury, and embezzlement of government funds. The sitting Members were convicted; the former Members pleaded guilty.*

In one of these cases, the United States Court of Appeals, summarizing the testimony of a House officer, stated that it is “within a congressman’s discretion to define the parameters of an employee’s responsibilities as long as those responsibilities related to the congressman’s ‘official and representative duties.’” Nevertheless, the court, in upholding the fraud conviction of the Member of Congress, stated that although the employees had performed some official services for the Member, “only a nominal percentage of [the employees’] responsibilities

¹⁵ *Id.* at 288-89.

¹⁶ *Id.* at 289 (internal citations omitted).

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were congressionally related,” and thus a jury had sufficient evidence to conclude that such employees were paid from clerk hire allowances “with the intention of compensating them for services rendered to the [defendant Member’s private business] or the defendant.” Thus, while it might have been argued that “it was a matter of [the Member’s] discretion to fix their duties and salaries as congressional employees,” the “defendant’s representations to the House Office of Finance that the [employees] were bona fide congressional employees were fraudulent and material in violation of 18 U.S.C. § 1001.”¹⁷

The Ethics Manual further states, regarding the prohibition against “special favors” found in the Code of Ethics for Government Service discussed below, that “[t]he prohibition against doing any special favors for anyone in one’s official capacity is a fundamental standard of conduct, and it applies to an official’s conduct with regard to not only his or her spouse or other family members, but more broadly to any person.”¹⁸

Regarding travel, the House Ethics Manual notes:

“Travel. Member and staff travel, including to one’s district, may be paid with official funds only if the primary purpose of the trip is the conduct of official business. As a general matter, a Member or staff person, while on official travel may engage in incidental campaign or political activity, provided that no additional travel expenses are incurred as a result. However, when the primary purpose of trip is in fact the conduct of campaign or political activity, then the travel expenses must be paid with campaign funds and cannot be paid with official funds. The Members’ Handbook and the Committees’ Handbook issued by the Committee on House Administration include provisions on campaign activity in the course of travel paid for with House funds. Thus when a Member or staff person wishes to engage in any such activity in the course of an official trip, he or she should first review the section of the appropriate Handbook on travel and consult with the Committee on House Administration staff as necessary.”¹⁹

22. Code of Ethics for Government Service

The Code of Ethics for Government Service instructs every employee to

[g]ive a full day’s labor for a full day’s pay; giving to the performance of his duties his earnest effort and best thought to the performance of duties²⁰

and

[n]ever discriminate unfairly by the dispensing of special favors or privileges to anyone, whether for remuneration or not; and never accept for himself or his

¹⁷ *Id.* at 289-90 (internal citations omitted).

¹⁸ *Id.* at 253-54.

¹⁹ *Id.* at 141 (internal citations omitted).

²⁰ Code of Ethics for Government Service, ¶ 3.

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*family, favors or benefits under circumstances which might be construed by reasonable persons as influencing the performance of his governmental duties.*²¹

23. Members' Congressional Handbook

The Members' Congressional Handbook provides that:

*Only expenses, the primary purpose of which are official and representational, and are incurred in accordance with the Handbook are reimbursable. In general: 1. The MRA may not be used to pay for: ... b. any expenses related to activities or events that are primarily social in nature (including but not limited to: sporting events, theme park activities, concerts, personal events, etc.); c. any expenses related to a charity or fundraiser; d. personal expenses; e. campaign expenses; f. campaign-related political party expenses ...*²²

*The Handbook provides detailed guidance on what is and is not reimbursable in the category of travel expenses.*²³ *Among the various requirements for reimbursement of travel expenses, the Members' Handbook notes that:*

Travel must be in support of the Member's official and representational duties to the district from which elected, and the primary purpose of the travel must be official in nature to be deemed "official travel."

Ordinary and necessary expenses incurred by the Member, the Member's employees, and in limited circumstances, vendors, while on official travel including transportation, lodging, meals (excluding alcohol), fees (e.g., parking, tolls, ticket change fees, travel insurance, etc.), and incidental expenses are reimbursable.

Official travel includes local travel and travel away from home overnight to conduct official and representational duties, within the United States and its territories and possessions, when returning to the duty station or residence is impractical.

*... An employee's primary duty station is either the employing Member's district or Washington, D.C., which is determined by the employee's primary residence.*²⁴

...

Official travel must originate and terminate in either Washington, D.C., the Member's District, or another location of official business except where otherwise stipulated in the Handbook.

²¹ *Id.*, ¶ 5.

²² See House Committee on House Administration, *Members' Congressional Handbook* (adopted April 30, 2024), at 5 (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.

²³ *Id.*

²⁴ *Members' Handbook* at 39.

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Transportation expenses to connect to or from another official or officially connected trip is also considered official travel. Any of the connecting/linking travel must occur within the U.S. to be reimbursed with official funds, and the primary purpose of the secondary trip must be official.

Commuting expenses (local transportation expenses incurred by the Member or employee while commuting between their residence and duty station) are not reimbursable, except in extraordinary circumstances (e.g., extreme weather conditions, staff working beyond availability of mass transit or rideshare arrangements, etc.) when authorized by the Member.

Official travel, paid for with the MRA, may not be for personal, campaign-related political party, campaign, or committee purposes.²⁵

Regarding the compensation of interns, the Members' Congressional Handbook states that "[p]aid interns must perform services for the Member on a temporary basis as part of an educational plan. Examples of an educational plan include, but are not limited to, participation in the Intern Lecture Series, attendance at committee hearings, attendance at CRS internship training programs, etc. Each Member is responsible for determining the activities of the Member's interns consistent with these requirements."²⁶

24. House Ethics Committee Guidance: Committee Reports

In July 2020, the Committee published a June 2020 Investigations Subcommittee Report (ISC) explaining: "[t]he ISC is well-aware that Members have demanding schedules that do not afford them the time to tend to the minutiae of every campaign transaction or congressional office task to ensure their campaigns and congressional offices operate in full compliance with relevant rules and laws. Members often delegate such oversight and compliance responsibilities to others But Members must be held to account when they know or should know of ethical violations that occur within the organizations they oversee; abdicate their duty to supervise the staff to whom they delegate substantial responsibilities; disregard concerns as they are brought to their attention; and hamstringing compliance professionals by not supplying necessary information or providing false information."²⁷

B. The OCC Received Multiple Submissions of Information Alleging That an Individual Paid by Rep. Collins's Office as a District Intern Did No Work for the Member's District Office.

25. A submission of information received by the OCC on September 6, 2024, alleged that in the final reporting period of the [2023] MRA expenditures, a "District Intern" was paid \$5000 for her time as an intern. The district intern in question is Caroline

²⁵ *Id.* at 40.

²⁶ *Id.* at 8.

²⁷ House Committee on Ethics, Investigative Subcommittee Report, *In the Matter of Allegations Relating to Representative Laura Richardson*, 112th Cong. 2d Sess. (2012) at 3.

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Craze (Brandon Phillips [*sic*] girlfriend) and she has never worked a day in the district office; she was paid for work that was not done in the district.²⁸

26. A second submission of information from another individual received on September 7, 2024, contained similar allegations. The September 7 submission alleged that

a “District Intern” named Caroline Craze was never employed in the district office, nor ever present. She was paid \$5000, and I am unsure what role she had. She is in a relationship with Brandon Phillips. To my knowledge, she is not a student in any program which would be aligned for rules for an intern.²⁹

C. The OCC’s Preliminary Review Found Evidence Corroborating Information in the Submissions—including Evidence that Caroline Craze May Have Been Employed Elsewhere While She Was Being Paid as a District Office Intern for Rep. Collins.

27. An initial review of official Statements of Disbursements of the House for the fourth quarter of 2023 confirmed that an individual named Caroline H. Craze was paid \$5,044.00 as a District Office Paid Intern by Rep. Collins’s office between November 4, 2023, and December 31, 2023.³⁰
28. The official Statements of Disbursements of the House for the fourth quarter of 2024 indicated that Caroline H. Craze was also paid \$5,244.44 as a District Office Paid Intern by Rep. Collins’s office between October 7, 2024, and December 5, 2024.³¹
29. The OCC’s initial review of public sources identified two online profiles believed to belong to the same Caroline Craze who was paid as a District Intern for Rep. Collins. The first, a profile on the professional networking site LinkedIn.com, indicates that Ms. Craze is based in the Atlanta Metropolitan Area and worked at Cox Communications from January 2022 until at least May 28, 2025 (when the OCC last retrieved Ms. Craze’s publicly available LinkedIn page).³²
30. According to her LinkedIn profile, Ms. Craze worked as an “Internal Consultant” for Cox Communications from January 2022 until January 2024—a period that encompasses the two months in late 2023 when she was paid from Rep. Collins’s Member Representational Allowance (“MRA”), ostensibly for serving as a District Intern.³³
31. Similarly, Ms. Craze’s LinkedIn profile indicated that she worked as an “Operations Management Analyst” at Cox Communications from December 2023 until at least May 28,

²⁸ Electronic form submission to OCC dated September 6, 2024 (on file with the OCC).

²⁹ Electronic form submission to OCC dated September 7, 2024 (on file with the OCC).

³⁰ Statement of Disbursements of the House (October 1, 2023, to December 31, 2023).

³¹ Statement of Disbursements of the House (October 1, 2024, to December 31, 2024).

³² Caroline Craze, LINKEDIN, https://www.linkedin.com/in/carolinecraze?trk=people-guest_people_search-card (copy saved May 28, 2025) (Exhibit 1 at 25-7636_0002 - 0007).

³³ *Id.*

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2025—a period that encompasses the two months in late 2024 when she was paid from Rep. Collins’s MRA, ostensibly for serving for a second time as a District Intern.³⁴

32. If the dates of employment listed on her LinkedIn profile are accurate, they suggest that at all times during which Ms. Craze was paid for ostensible service as a District Intern, she was—according to the information on her LinkedIn profile—employed elsewhere. Indeed, if the dates are accurate, they suggest that for some period of time in December 2023, while Ms. Craze was being paid for serving for the first time as a District Intern for Rep. Collins, she was simultaneously employed in not one but two other positions at Cox Communications in Atlanta, Georgia (both an “Internal Consultant” and “Operations Management Analyst”).³⁵
33. The “Experience” section of Ms. Craze’s LinkedIn profile did not list any period of employment with Rep. Collins, either in his District Office or his Washington, D.C. Office, in 2023 or 2024.³⁶ As discussed above, other roles—such as reported employment at Cox Communications—are listed under “Experience” for the time periods when Ms. Craze ostensibly served as a District Intern.
34. As detailed in Section III below, the OCC made multiple good-faith attempts to contact Ms. Craze to confirm the above employment information with her directly, but those attempts were unsuccessful.
35. Ms. Craze’s full LinkedIn profile is no longer publicly viewable online, but the OCC has preserved a copy of the public profile as it appeared on May 28, 2025.

³⁴ *Id.*

³⁵ *Id.*

³⁶ *Id.*

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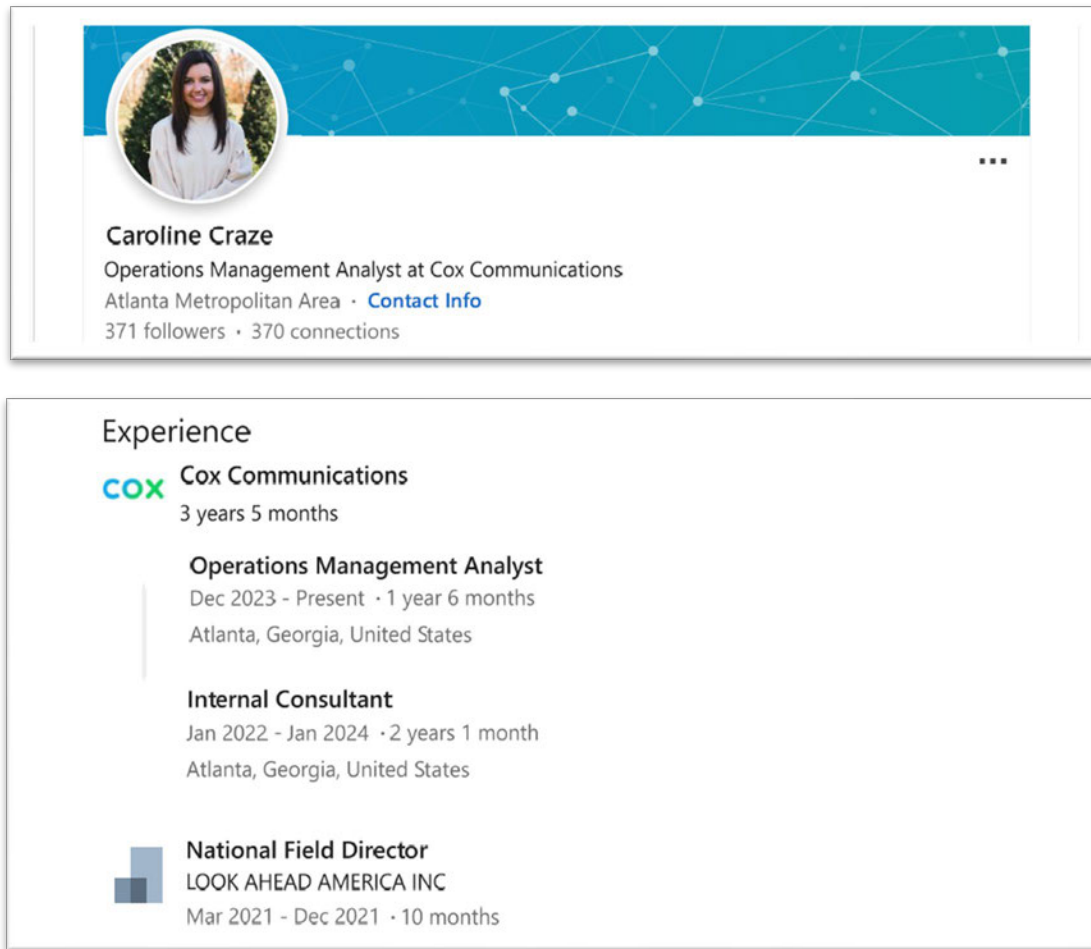


Figure 1. Excerpts of Exhibit 1, Caroline Craze’s public LinkedIn profile as it appeared online on May 28, 2025.

36. The second online profile identified by the OCC is a profile on the social media platform Instagram belonging to user “@caroline_craze.”³⁷ As of June 12, 2025, when the page was last retrieved by the OCC, Ms. Craze’s Instagram profile included a profile photo consistent with the one on Ms. Craze’s LinkedIn profile, as well as a photograph of Ms. Craze and an individual later identified by a witness as Brandon Phillips, Rep. Collins’s Chief of Staff.³⁸
37. Like Ms. Craze’s LinkedIn profile, her Instagram profile is no longer publicly viewable online, but the OCC has preserved a copy of the top portion of the public page as it appeared on June 12, 2025.

³⁷ “caroline_craze,” INSTAGRAM, https://www.instagram.com/caroline_craze/ (copy saved June 12, 2025) (Exhibit 2 at 25-7636_0014 - 0016).

³⁸ Witness 1 Transcript at 33:3-9.

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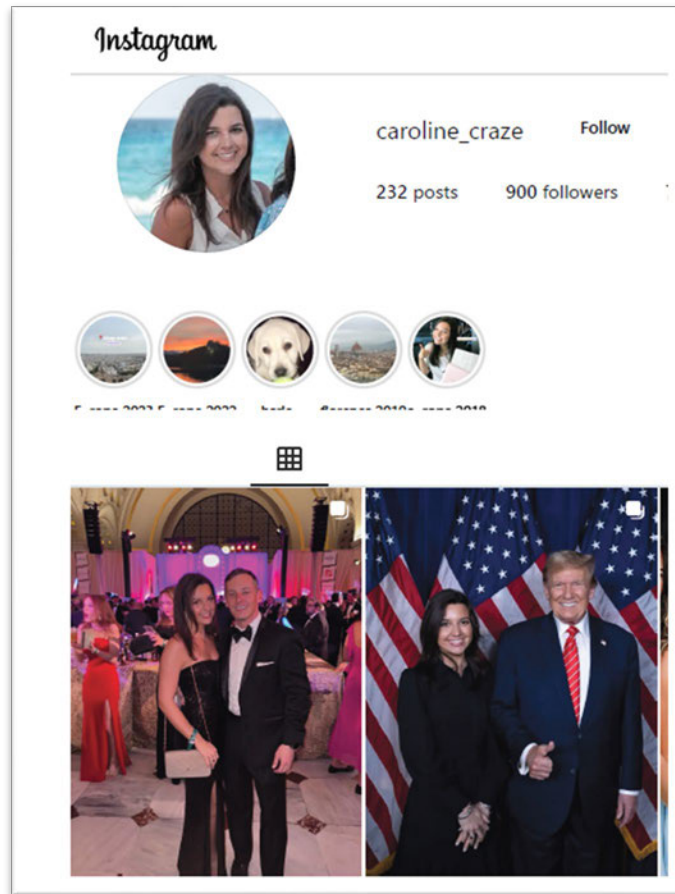


Figure 2. Excerpt of Exhibit 2, Caroline Craze’s public Instagram profile as it appeared online on June 12, 2025. The posted photograph appearing in the bottom left corner of Figure 2 is of Caroline Craze and an individual witnesses identified to the OCC as Brandon Phillips, Rep. Collins’s Chief of Staff.

D. Several Witnesses Corroborated the Allegation That Caroline Craze Never Worked for Rep. Collins’s District Office.

38. As part of the OCC’s review, the OCC spoke with seven current and former staffers of Rep. Collins’s District and Washington, D.C. Offices.
39. The information provided by those witnesses—including testimony provided in formal, transcribed interviews—corroborates the allegation that Ms. Craze never performed any duties in or for Rep. Collins’s District Office in 2023—despite being paid as a District Intern from November 4, 2023, to December 31, 2023.³⁹ The information provided to the OCC by those witnesses similarly indicates that Ms. Craze did not perform any duties in or for Rep.

³⁹ Statement of Disbursements of the House (October 1, 2023, to December 31, 2023).

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Collins's District Office in 2024—despite being paid for a second time as District Intern from October 7, 2024, to December 5, 2024.⁴⁰

- i. Current and Former Members of Rep. Collins's District Staff Told the OCC That Caroline Craze Never Worked in Rep. Collins's District Office.

40. Of the current and former members of Rep. Collins's District Office staff the OCC spoke with, none were aware of Ms. Craze performing any duties for Rep. Collins's District Office.
41. Both Witness 1 and Witness 4 said that they first became aware of Ms. Craze when her name appeared on the Statement of Disbursements of the House for the fourth quarter of 2023.⁴¹ According to Witness 1, the Statement of Disbursements "said she was a [D]istrict [I]ntern. And so right away we started asking questions among the [D]istrict staff. Do we know who this person is?"⁴² The conclusion among Rep. Collins's District staff at the time was that "[n]obody had heard of her. And we determined that she had never done a district internship in our office."⁴³
42. Witness 4 recalled a similar reaction to encountering Ms. Craze's name listed in the Statement of Disbursement as a paid intern: "... I kind of did some mental digging to remember who had been in the office. ... And so I kind of did a mental inventory and tried to remember this person, and I had no recollection."⁴⁴ Witness 4 also stated, "I recognized all the other names, and that's why that one stood out."⁴⁵
43. When asked directly if they had ever worked with Ms. Craze in any capacity, Witness 1—who indicated that they routinely interacted with the District Office's interns—said, "No, I did not. I've never met her. ... I've never spoken to her. I've never communicated to her. I've never seen her in person."⁴⁶ When asked if anyone had ever told them that Ms. Craze came into the District Office to do work there, Witness 1 responded, "She did not come into the [D]istrict [O]ffice to do work."⁴⁷ Witness 1 also noted that District Interns "were not remote workers" and that they "came in person."⁴⁸
44. Three other witnesses—who, like Witness 1, worked in Rep. Collins's District Office during the periods in 2023 and 2024 when Ms. Craze was paid as a District Intern—all asserted that they were unaware of Ms. Craze ever working for the Office.

⁴⁰ Statement of Disbursements of the House (October 1, 2024, to December 31, 2024).

⁴¹ Witness 1 Transcript at 18:15-19 ("I first heard of her name when I saw her on the members – what is it – disbursement, financial disbursements for the end of the year. And it showed that she was a district intern and getting paid."); Witness 4 Transcript at 16:21 – 17:7 ("I – the first time that I saw the name was on an MRA report, and I did not recognize it at the time ...").

⁴² Witness 1 Transcript at 19:21 – 20:1.

⁴³ *Id.* at 20:17-19.

⁴⁴ Witness 4 Transcript at 17:1-7.

⁴⁵ *Id.* at 23:15-16.

⁴⁶ Witness 1 Transcript at 24:8-14.

⁴⁷ *Id.* at 28:12-13.

⁴⁸ *Id.* at 18:2-10.

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45. Witness 7—who worked in Rep. Collins’s District Office during both periods when Ms. Craze was paid as a District Intern—told the OCC that they had never seen Ms. Craze in the District Office, nor had they ever seen Ms. Craze sending, receiving, or being looped into any e-mail messages with other staffers.⁴⁹
46. When Witness 4 was asked if they were “aware of any work that Caroline Craze did” for either Rep. Collins’s District Office or his D.C. Office, they said, “No. None in the [D]istrict.”⁵⁰
47. When they first spoke with the OCC, Witness 6 said that they had never heard of an intern named Caroline Craze.⁵¹ Witness 6 also noted that the name did not appear on a list of interns maintained by District Office staff.⁵²
48. The OCC received and reviewed copies of an Excel spreadsheet that District staff used to track interns hired by the District Office in 2023 and 2024.⁵³ Witness 1 said that they believed the spreadsheet listed all those who served as interns with Rep. Collins’s District Office in 2023 and 2024.⁵⁴ Ms. Craze’s name does not appear on the list.⁵⁵
- ii. According to Current and Former Staffers in Rep. Collins’s D.C. Office, Caroline Craze Also Did Not Serve as an Intern in Their Office.
49. Although several witnesses indicated that Ms. Craze may have had a limited role supporting some work carried out by Rep. Collins’s staff in 2023 and 2024, current and former staffers who worked in his Washington, D.C. Office while Ms. Craze was on Rep. Collins’s payroll told the OCC that she never served as a D.C. intern—which, like the District Intern position, was an in-person position.⁵⁶
50. Witness 2, a former member of Rep. Collins’s D.C. staff, told the OCC that they had met Ms. Craze in the Washington D.C. Office, estimated that Ms. Craze had been to that office “five or six times,”⁵⁷ and said they recalled meeting Ms. Craze in 2023 when she “came up one

⁴⁹ OCC Staff Memorandum of Call with Witness 7 on June 2, 2025 (on file with the OCC).

⁵⁰ Interview Transcript of Witness 4, August 1, 2025 (“Witness 4 Transcript”) at 22:13-18. Witness 4 went on to note that they had “no information regarding the day-to-day duties of what was happening in ... D.C.,” but they acknowledged that Ms. Craze was not among the D.C. staff who they knew to expect “would be answering the phone regularly or who to expect an email message from.” Witness 4 Transcript at 22:18 – 23:9.

⁵¹ OCC Staff Memorandum of Call with Witness 6 on July 9, 2025 (on file with the OCC).

⁵² *Id.* On a subsequent call with the OCC, Witness 6 claimed that the OCC had not asked about “Caroline” Craze but had instead asked about a “Carolyn” Craze. Witness 6 claimed not to know anyone by the latter name, but suggested there was a possibility that “Caroline” Craze might be a person they had met at a dinner. In any event, because Witness 6 did not claim to know of a District Intern by either name, and because the name “Caroline” Craze does not appear on the intern list discussed above, the OCC is inclined to credit Witness 6’s statements on their first call with the OCC. OCC Staff Memorandum of Call with Witness 6 on June 22, 2025 (on file with the OCC).

⁵³ See District Intern Spreadsheet (2023 – 2024) (Exhibit 3 at 25-7636_0018).

⁵⁴ Witness 1 Transcript at 61:8-22.

⁵⁵ See District Intern Spreadsheet (2023 – 2024) (Exhibit 3 at 25-7636_0018).

⁵⁶ See Interview Transcript of Witness 2, July 25, 2025 (“Witness 2 Transcript”) at 11:2 (stating regarding Rep. Collins’s interns that “they were all in person”); Witness 3 Transcript at 12:13-14 (“In DC, it’s an in-person position, yeah.”).

⁵⁷ Witness 2 Transcript at 12:19.

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time to help us when the [C]ongressman was running for the vice chair race, and it was all hands on deck. She came up, helped us stuff some envelopes and things”⁵⁸ However, Witness 2 then noted that Ms. Craze had been assisting “in her capacity as Brandon Phillips’[s] girlfriend”⁵⁹ and that they “only remember her up there, maybe two days.”⁶⁰ Witness 2 further noted, “I found out significantly later from the [D]eputy [C]hief of [S]taff that she was an intern in the District office.”⁶¹

51. Witness 3, a current member of Rep. Collins’s D.C. staff, told the OCC that Mr. Phillips “did mention one time she [Ms. Craze] was helping us out with some communication stuff, so social media content and whatnot.”⁶² However, when asked where Ms. Craze interned, Witness 3 responded, “I believe it was the District because she didn’t intern up here.”⁶³ When asked if they had any interactions with Ms. Craze when she was on Rep. Collins’s payroll, Witness 3 stated, “Not in an official capacity, no. I didn’t supervise her or give her any work to do.”⁶⁴
52. Witness 1—who worked in Rep. Collins’s District Office during the periods in 2023 and 2024 when Ms. Craze was paid as a District Intern—said they had been told by Witness 3 that Ms. Craze “did work in the D.C. [O]ffice during the week leading up to the election of House leadership following the domino effect that took place when Speaker Mike Johnson got that position,”⁶⁵ and that they heard Ms. Craze “was helping with social media as well.”⁶⁶ However, Witness 1 also noted that Ms. Craze “was not a regular presence that I’m aware of” in Rep. Collins’s D.C. Office.⁶⁷ Witness 1 also seemed to cast some doubt on the claim that Ms. Craze was “helping with social media” when they told the OCC that “everybody knew that Brandon [Phillips] very much controls social media. I mean, he’s large and in charge with ... that [M]ember’s tweets.”⁶⁸
53. Witness 5, another former member of Rep. Collins’s D.C. staff whose tenure included the months in 2023 when Ms. Craze was being paid as a District Intern, told the OCC that they were not aware of any work done by Ms. Craze (and that, to their knowledge, Ms. Craze was not an employee and never received a staff badge).⁶⁹
54. Witness 7 said they thought the first time Ms. Craze was hired, the understanding was that she was helping with a House membership leadership race that Rep. Collins was involved in,

⁵⁸ *Id.* at 13:9-13.

⁵⁹ *Id.* at 13:13-14.

⁶⁰ *Id.* at 14:12-13.

⁶¹ *Id.* at 13:14-17.

⁶² Witness 3 Transcript at 16:19-21.

⁶³ *Id.* at 13:13-14.

⁶⁴ *Id.* at 13:21-22.

⁶⁵ Witness 1 Transcript at 24:22 – 25:3.

⁶⁶ *Id.* at 27:3-4.

⁶⁷ *Id.* at 28:22.

⁶⁸ *Id.* at 27:4-7.

⁶⁹ OCC Staff Memorandum of Call with Witness 5 on June 25, 2025 (on file with the OCC).

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended and that the second time she was hired, Ms. Craze was supposed to be helping with communications.⁷⁰

- iii. Based on Information Provided to the OCC by Current and Former Staffers, Caroline Craze Did Not Fit the Usual Profile of an Intern in Rep. Collins's District or D.C. Offices, and She Does Not Appear to Have Been Hired Through the Usual Process.

55. There appear to be significant differences between Ms. Craze's hiring and that of other interns.
56. First, as discussed above, current and former District staffers told the OCC that Ms. Craze never came to the District Office while she was on Rep. Collins's payroll ostensibly for serving as a District Intern—which was an in-person position.⁷¹ And although several current and former D.C. and District staffers indicated that Ms. Craze may have had a limited role supporting some work that was carried out by Rep. Collins's staff in 2023 and 2024—including work in Washington, D.C.—none indicated that she worked in-person from the D.C. Office, which would have been required of a D.C.-based intern.⁷²
57. Second, according to current and former staffers, all of Rep. Collins's District Interns were students,⁷³ and his D.C. Interns were students or recent graduates.⁷⁴ Witness 1 specifically noted that Rep. Collins's District Interns “were normally students at UGA, which is in Athens,” near the District Office.⁷⁵ According to her LinkedIn profile, Ms. Craze—who was classified as a “District Office Paid Intern” by Rep. Collins's Office—was not a student in 2023 or 2024, having graduated from Auburn University in 2020.⁷⁶
58. Third, according to Witness 1 and Witness 4, District Interns were not paid,⁷⁷ whereas Ms. Craze was paid \$5,044.00 for serving as a “District Office Paid Intern” for approximately two months in 2023,⁷⁸ and another \$5,244.44 for serving in that role for approximately two months in 2024.⁷⁹
59. Fourth, according to Witness 1 and Witness 4, Ms. Craze's hiring does not appear to have followed the usual process that the District Office used to hire interns. Witness 1 told the

⁷⁰ OCC Staff Memorandum of Call with Witness 7 on June 2, 2025 (on file with the OCC).

⁷¹ See Section II.D.i.

⁷² See Section II.D.ii.

⁷³ See Witness 1 Transcript at 10:19-20 (“I believe they’re – they were all students.”); Witness 4 Transcript at 13:9 (“They were all students.”).

⁷⁴ See Witness 2 Transcript at 7:17-19 (“Most of them were students, I believe. I think we had a couple that were recent graduates.”); Witness 3 Transcript at 8:9-13 (“Interns? Generally speaking, they’re college students or someone maybe who just recently graduated potentially, and they’re looking for a job on the Hill or they, you know, just have an interest in this area generally.”).

⁷⁵ Witness 1 Transcript at 10:6-7.

⁷⁶ Caroline Craze, LINKEDIN, https://www.linkedin.com/in/carolinecraze?trk=people-guest_people_search-card (copy saved May 28, 2025) (Exhibit 1 at 25-7636_0006).

⁷⁷ Witness 1 Transcript at 12:12-13 (“But we did not, to my knowledge, pay any of our [D]istrict [I]nterns during Mike Collin[s] term.”); Witness 4 Transcript at 21:12-13 (“... none of them were paid in our [D]istrict [O]ffice.”).

⁷⁸ Statement of Disbursements of the House (October 1, 2023, to December 31, 2023).

⁷⁹ Statement of Disbursements of the House (October 1, 2024, to December 31, 2024).

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OCC that the hiring of District Interns was the responsibility of the then-Deputy District Director, Kevin Mason, and a Staff Assistant who “would work a little bit more closely with those interns,” and they “were involved with interviewing and selecting them.”⁸⁰ As to the hiring process itself, it was up to those two individuals

whether they communicated with UGA about the need and advertised it among students, or whether those students simply found their way to us through our online application. But prior to the semester that we were seeking internships, they would review those applications, they would reach out to them, they would schedule an interview, and then they would select the ones that they wanted and set up a schedule for them.⁸¹

60. Witness 4 provided additional detail about the usual hiring process for District Interns:

There was an application period where they would gather the applicants. Typically, there would be either an in-person interview or a Zoom meeting or a virtual – I don't know if it was Zoom, what platform. But we would often hear we have great prospects; we just finished with this person, you know; we actually have multiple to choose from; we're going to go with these two for this semester.⁸²

61. Given that Ms. Craze's name does not appear on the intern list that the District Office maintained, that Witness 1 and Witness 4 told the OCC they first learned her name when they saw it on the Statement of Disbursements of the House in the fourth quarter of 2023, and that none of the District staff “had heard of her”⁸³ in late 2023 or early 2024⁸⁴—it does not appear that Ms. Craze's hiring went through the usual process (or the individuals responsible for hiring District Interns).

62. Fifth, as detailed in the next sub-section, several current and former staffers told the OCC that Ms. Craze had a personal romantic relationship with Mr. Phillips, Rep. Collins's Chief of Staff, that predated her hiring by Rep. Collins's Office.

iv. Several Witnesses Understood That Caroline Craze Had a Preexisting Personal Romantic Relationship with Brandon Phillips, Rep. Collins's Chief of Staff, Who May Have Been Directly Involved in Her Hiring.

63. When asked how they knew Ms. Craze, Witness 2 said they had been introduced to her as “the Chief of Staff Brandon Phillips'[s] girlfriend.”⁸⁵ Similarly, Witness 3 said, “I've known her on and off because she's my – our [C]hief of [S]taff's girlfriend. So, I met her early on when we took office, when she was up here, and I've seen her various times”⁸⁶ Witness 1, who first learned of Ms. Craze when they saw her name listed on the Statement of Disbursements of the House, said, “... months later, I heard through some friends that she

⁸⁰ Witness 1 Transcript at 11:20-22.

⁸¹ *Id.* at 13:9-17.

⁸² Witness 4 Transcript at 13:19 – 14:5.

⁸³ Witness 1 Transcript at 20:17.

⁸⁴ *See id.* at 21:17-18.

⁸⁵ Witness 2 Transcript at 12:4-5.

⁸⁶ Witness 3 Transcript at 13:2-5.

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was the girlfriend of our [C]hief of [S]taff, Brandon Phillips.”⁸⁷ Witness 4 told the OCC that they formed their own conclusion that Ms. Craze and Mr. Phillips were in a relationship based on photographs they saw on social media.⁸⁸

64. As noted above, those statements appear to be supported by at least one photograph of Mr. Phillips and Ms. Craze posted to her Instagram profile.⁸⁹ Recent public reporting has also described a romantic relationship between Ms. Craze and Mr. Phillips.⁹⁰
65. According to the Employee Handbook for Rep. Collins’s Office, “[t]he Deputy Chief of Staff will manage the intern program for the Office of Representative Mike Collins,” and although “[d]aily tasks and responsibilities will be coordinated with the interns [*sic*] ‘site manager’ ... [a]ll H.R. responsibilities, hiring, and references will be handled by the Deputy Chief of Staff in conjunction with the interns [*sic*] ‘site manager.’”⁹¹
66. In apparent contrast with that organization structure, information provided by two witnesses suggests that Mr. Phillips may have been directly involved in hiring and supervising Ms. Craze. Witness 1 claimed that they were told by Witness 3 that Ms. Craze “reported to Brandon [Phillips].”⁹² When interviewed by the OCC, Witness 3 seemed to acknowledge that Mr. Phillips was involved in hiring Ms. Craze. When asked who would have been involved in Ms. Craze’s hiring, Witness 3 said, “I would imagine that if the District [O]ffice was involved, I don’t know, but Brandon [Phillips] and whoever filed the paperwork, which was probably our financial advisor at the time or financial administrator, John F[erland].”⁹³
67. Rep. Collins and Mr. Phillips declined to respond to formal Requests for Information from the OCC seeking information and documents concerning the hiring of Ms. Craze and any work that she performed for Rep. Collins’s District Office in 2023 and 2024.
68. Based on the information described above in Sections II.B through II.D, the Board finds that there is substantial reason to believe each of the allegations outlined above as they pertain to the hiring of Ms. Craze.

⁸⁷ Witness 1 Transcript at 19:8-10.

⁸⁸ Witness 4 Transcript at 18:3-10 (“I found that on my own, just trying to figure out who she was. ... And I Googled her name and came across her social profile and recognized Brandon Phillips in photos with her.”); *id.* at 18:13-18 (“I knew he had a girlfriend, because he had mentioned it. He was going to stay with his girlfriend in – in Atlanta at a – at a Christmas lunch. The pictures show them, you know, close together, arm-in-arm, not a typical professional photo.”).

⁸⁹ “caroline_craze,” INSTAGRAM, https://www.instagram.com/caroline_craze/ (copy saved June 12, 2025) (Exhibit 2 at 25-7636_0014).

⁹⁰ See, e.g., Jon Michael Raasch, *Scandal rocks Congress as top aide is caught in outrageous plot with his much-younger girlfriend: ‘The nerve!’*, DAILY MAIL, July 30, 2025, <https://www.dailymail.co.uk/news/article-14952099/Scandal-rocks-Congress-aide.html>.

⁹¹ See U.S. House of Representatives Employee Handbook for the Office of U.S. Representative Mike Collins Serving Georgia’s 10TH District | Updated: January 23, 2023 (Exhibit 4 at 25-7636_0090).

⁹² Witness 1 Transcript at 24:1-2.

⁹³ Witness 3 Transcript at 15:9-14.

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69. With regard to Rep. Collins's responsibility in the hiring of Ms. Craze, House Rules and precedent are clear. A member must provide reasonable oversight of their office.⁹⁴ Accordingly, either Rep. Collins was aware of Mr. Phillips's actions, or he so thoroughly delegated his authority over the office that he was nevertheless in violation of House Rules, precedent, and Committee on Ethics guidance.⁹⁵

E. The Same Submissions That Made Allegations Regarding the Hiring of Caroline Craze Also Raised Other Questions About the Conduct of Rep. Collins's Chief of Staff.

70. In addition to the allegations concerning the hiring of Ms. Craze, the submissions the OCC received also alleged that Mr. Phillips has misused Rep. Collins's MRA funds.

i. **The Submissions Allege That Rep. Collins's Chief of Staff May Have Used MRA Funds for Non-Official Travel-Related Expenses, Including Personal and Campaign-Related Expenses.**

71. A submission of information received on September 6, 2024, alleged that Mr. Phillips, Rep. Collins's Chief of Staff,

has abused the MRA throughout his tenure as CoS [Chief of Staff]. Mr. Phillips does not have a home and uses MRA funds to pay for hotels, meals and travel to and from Georgia and DC, paying for hotels in each location despite his duty station being that of Washington, DC. When he travels to Georgia he is not always traveling in support of the member but for personal or campaign related events. There may be some instances when travel was made in support of the member but overall, Mr. Phillips travels to Georgia for personal or campaign reasons.⁹⁶

72. The second, separate submission of information received on September 7, 2024, contained similar allegations. The September 7 submission alleged that

⁹⁴ See, e.g., House Committee on Ethics, Investigative Subcommittee Report, *In the Matter of Allegations Relating to Representative Laura Richardson*, 112th Cong. 2d Sess. (2012) at 3 ("... Members must be held to account when they know or should know of ethical violations that occur within the organizations they oversee; abdicate their duty to supervise the staff to whom they delegate substantial responsibilities; disregard concerns as they are brought to their attention; and hamstringing compliance professionals by not supplying necessary information or providing false information."); see also House Ethics Manual at 134 ("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. ... 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." (citing House Comm. on Standards of Official Conduct, *In the Matter of Rep. E.G. "Bud" Shuster*, H. Rep. 106-979, 106th Cong., 2d Sess. 31 (2000); House Comm. on Standards of Official Conduct, *Statement Regarding Complaints Against Rep. Newt Gingrich*, 101st Cong., 2d Sess. 60, 165-66 (1990); House Comm. on Standards of Official Conduct, *In the Matter of Rep. Austin J. Murphy*, H. Rep. 100-485, 100th Cong., 1st Sess. 4 (1987))).

⁹⁵ Here, House Rule 23, cl. 8(a) in particular provides, "[a] Member ... or officer of the House may not retain an employee who does not perform duties for the offices of the employing authority commensurate with the compensation such employee receives."

⁹⁶ Electronic form submission to OCC dated September 6, 2024.

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Firstly, this is evident in the quarterly release of the statements of disbursement. His [Mr. Phillips's] home address is listed in Georgia, but it is unknown if he actually resides there. Mr. Phillips spends an exorbitant amount of the MRA on travel expenses that are not in benefit of the member. His duty station is the D.C. office and he has charges from hotels, flights, and other accommodations each week going from D.C. to GA.⁹⁷

ii. Although Relatively High, Mr. Phillips's Reimbursed Travel-Related Expenses Appear to Fall into Allowable Categories.

73. According to records reviewed by the OCC, Rep. Collins's office spent approximately \$131,000 in MRA funds on travel in 2023.⁹⁸ Of that amount, \$70,760.63 was spent on travel by Mr. Phillips.⁹⁹ Lodging comprised the majority of Mr. Phillips's travel expenses (\$42,654.83), with the next largest amounts spent on airfare (\$22,266.20) and taxis or rideshares (\$4,713.94).¹⁰⁰
74. The OCC reviewed official Statements of Disbursements of the House and found that, in the first quarter of calendar year 2023, Mr. Phillips's travel expenses were \$7,986.06—or approximately half—of the \$16,573.38 total travel expenses of Rep. Collins's office.¹⁰¹ In the second quarter, Mr. Phillips's travel expenses were \$26,400.40 of the \$41,232.62 office total.¹⁰² In the third quarter, Mr. Phillips's travel expenses were \$14,700.34 of the \$31,900.97 office total.¹⁰³ In the fourth quarter, Mr. Phillips's travel expenses were \$21,673.83 of the \$41,692.90 office total.¹⁰⁴
75. When compared with the travel spending of other Member offices, the approximately \$130,000 that Rep. Collins's office spent on travel in 2023 ranked 33rd among all Members. A sample analysis of MRA travel disbursements for five other Members' chiefs of staff in southeastern states—Georgia, South Carolina, Florida, Alabama, and North Carolina—suggests that the approximately \$70,000 spent on travel by Mr. Phillips is relatively high. The sampled chiefs of staff for freshmen Members in the same region of the country spent between approximately \$3,300 and \$8,500 on travel in 2023.
76. For the calendar year 2024, Mr. Phillips's travel expenses were \$18,205.10 of the office's \$43,010.27 first quarter total;¹⁰⁵ \$21,680.39 of the \$44,459.33 second quarter total;¹⁰⁶

⁹⁷ Electronic form submission to OCC dated September 7, 2024.

⁹⁸ Statements of Disbursements of the House (January 1, 2023, to December 31, 2023).

⁹⁹ *Id.*

¹⁰⁰ *Id.*

¹⁰¹ Statement of Disbursements of the House (January 1, 2023, to March 31, 2023).

¹⁰² Statement of Disbursements of the House (April 1, 2023, to June 30, 2023).

¹⁰³ Statement of Disbursements of the House (July 1, 2023, to September 30, 2023).

¹⁰⁴ Statement of Disbursements of the House (October 1, 2023, to December 31, 2023).

¹⁰⁵ Statement of Disbursements of the House (January 1, 2024, to March 31, 2024).

¹⁰⁶ Statement of Disbursements of the House (April 1, 2024, to June 30, 2024).

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\$10,097.92 of the \$24,402.71 third quarter total;¹⁰⁷ and \$8,542.29 of the \$21,030.99 fourth quarter total¹⁰⁸—amounts roughly similar to his travel-related expenses in 2023.

77. According to the official Statements of Disbursement reviewed by the OCC, Mr. Phillips’s travel expenses included “lodging,” “taxi/ride share,” “airfare commercial transport,” “meals,” “wi-fi on travel,” and “parking.”¹⁰⁹ Such expenses fall within categories that are, at least on their face, reimbursable under the rules, namely, “transportation, lodging, meals (excluding alcohol), fees (e.g., parking, tolls, ticket change fees, travel insurance, etc.), and incidental expenses.”¹¹⁰

iii. Information Provided by Witnesses Raised Other Questions About the Permissibility of the Chief of Staff’s Travel Expense Reimbursements That the OCC Could Not Conclusively Answer Without Cooperation from Mr. Phillips and Rep. Collins.

78. On the other hand, information provided by witnesses and documents reviewed by the OCC raise questions about where Mr. Phillips’s official duty station was during 2023 and 2024, whether that designation reflected the reality of his work for Rep. Collins, and, ultimately, whether Mr. Phillips’s expensing of travel to and lodging in Washington, D.C. was appropriate.

79. Based on reimbursement records the OCC has reviewed, Mr. Phillips was routinely reimbursed for travel to and lodging in Washington, D.C.¹¹¹ That necessarily implies that, contrary to the information in the submissions, Mr. Phillips’s duty station was Rep. Collins’s District. (Under House rules, an employee can only be reimbursed for travel “away from home”—that is, their residence or duty station—and “[a]n employee’s primary duty station is either the employing Member’s district or Washington, D.C., which is determined by the employee’s primary residence.”¹¹²)

80. According to Witness 1, the Employee Handbook in Rep. Collins’s Office similarly envisions that “[a]ll staff are D.C. or [D]istrict [staff]. You’re assigned a duty station, one of those two.”¹¹³ Witness 1 stated that they believed that Mr. Phillips’s primary duty station

¹⁰⁷ Statement of Disbursements of the House (July 1, 2024, to September 30, 2024).

¹⁰⁸ Statement of Disbursements of the House (October 1, 2024, to December 31, 2024).

¹⁰⁹ Statements of Disbursements of the House (January 1, 2023, to December 31, 2023).

¹¹⁰ *Members’ Handbook* at 42.

¹¹¹ See, e.g., Brandon Phillips Lodging and Uber Sept 6-15 | Expense Report #104457 | Expensed By: Brandon Phillips” (including lodging expenses at the Courtyard by Marriott Washington Capitol Hill Navy Yard (Exhibit 5 at 25-7636_0095).; Brandon Phillips September 18 through 22 | Expense Report #105834 | Expensed By: Brandon Phillips” (including lodging expenses at the Residence Inn Capitol Hill/Navy Yard and AC Hotels by Marriott Capitol Hill/Navy Yard (Exhibit 6 at 25-7636_0104 - 0105); Brandon Phillips - Flights September | Expense Report #107865 | Expensed By: Brandon Phillips (including airfare expenses between Washington, D.C. and Atlanta, Georgia) (Exhibit 7 at 25-7636_0113 - 0116). “Approvers” listed on those expense reports included Mr. Phillips, John Ferland, and Monica Burton.

¹¹² *Members’ Handbook* at 29.

¹¹³ Witness 1 Transcript at 59:3-4. Witness 1 was asked about a section of the Employee Handbook that read in part, “Occasionally, D.C. staff may travel to the district and district staff may travel to Washington, D.C. for official purposes.” The Employee Handbook does not seem to allow for any other category of staff. See U.S. House of Representatives Employee Handbook for the Office of U.S. Representative Mike Collins Serving Georgia’s 10TH

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was technically Rep. Collins's District,¹¹⁴ but when asked where Mr. Phillips was based, Witness 1 told the OCC that Mr. Phillips "always worked out of D.C."¹¹⁵ When asked if Mr. Phillips "ever" worked out of the District Office, Witness 1 answered simply, "No."¹¹⁶ It was Witness 1's understanding that Mr. Phillips "would fly each week back and forth [f]rom Georgia to D.C."¹¹⁷

81. Although they said they were not aware of the specific purposes of the trips for which Mr. Phillips was reimbursed from Rep. Collins's MRA, Witness 1 suggested it seemed improper for Mr. Phillips to be reimbursed for all of his travel to Washington, D.C. When asked if they were aware of the specific purpose of any trip Mr. Phillips took, Witness 1 said, "No, not specifically. But I guess I'm saying that ... when Congress was in session, during the week he was in D.C. And when that week – work week was over, he would fly back to wherever it is he resided."¹¹⁸ And when asked if they were aware of Mr. Phillips being reimbursed from the MRA for campaign travel, Witness 1 said they were "not privy. ... All I know is if you're looking at those financials, there's a lot attributed to his travel and accommodations."¹¹⁹
82. Witness 1 and Witness 7 both acknowledged that, in theory, a House chief of staff can live in their Member's district, but they did not think that was the situation with Mr. Phillips. For example, Witness 1 said that although they knew that chiefs of staff can be "district-based," in their experience those chiefs are "very much *in*" their district—whereas Mr. Phillips was rarely in Rep. Collins's District.¹²⁰ Witness 7 similarly noted to the OCC that it is not unheard of for a chief of staff to live in a Member's district, but even when Mr. Phillips was in Rep. Collins's District, he rarely came to the office. Witness 7 could recall seeing Mr. Phillips in the District Office only three or four times in 2023 and 2024, and two of those occasions were office Christmas parties.¹²¹
83. Witness 4 made substantially similar statements to the OCC regarding where Mr. Phillips worked. When asked where Mr. Phillips was based, Witness 4 said, "I have no idea. His primary duties were to D.C., but I don't know where his home of record was."¹²² When asked what they based that on, Witness 4 said, "He was there in DC., in the office, managing the D.C. offic[e], and I may have seen him in the office, the [D]istrict [O]ffice, four of five times" between 2023 and 2024.¹²³
84. When asked where Mr. Phillips was based, Witness 3, a member of Rep. Collins's D.C. staff, also seemed to indicate that Mr. Phillips worked a majority of the time in Washington, D.C.,

District | Updated: January 23, 2023. (Exhibit 4 at 25-7636_0042). When asked if there was any other category, Witness 1 said, "Nope." Witness 1 Transcript at 59:6.

¹¹⁴ OCC Staff Memorandum of Call with Witness 1 on June 24, 2025 (on file with the OCC).

¹¹⁵ Witness 1 Transcript at 34:7.

¹¹⁶ Witness 1 Transcript at 34:10.

¹¹⁷ *Id.* at 34:17-18.

¹¹⁸ *Id.* at 35:14-18.

¹¹⁹ *Id.* at 37:10-14.

¹²⁰ OCC Staff Memorandum of Call with Witness 1 on June 24, 2025 (on file with the OCC).

¹²¹ OCC Staff Memorandum of Call with Witness 7 on June 2, 2025 (on file with the OCC).

¹²² Witness 4 Transcript at 24:6-8.

¹²³ *Id.* at 24:11-14.

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despite not living there. Witness 3 said that Mr. Phillips “comes up to [D.C.] when we’re in session” but “lives in Georgia.”¹²⁴ When asked where Mr. Phillips worked when not in Rep. Collins’s D.C. Office—“is he typically working from his place in South Georgia or Florida, or is he in the District primarily?”—Witness 3 said, “I couldn’t tell you that. I don’t know exactly where he works. He doesn’t report to me on where he is.”¹²⁵

85. Whereas the statements of Witness 1 and Witness 3, as well as the records of reimbursements that the OCC reviewed, suggest Mr. Phillips’s official duty station would have been Rep. Collins’s District, Witness 2 said Mr. Phillips was based in Washington, D.C.¹²⁶
86. Witnesses generally seemed to agree that Mr. Phillips did not primarily reside in Washington, D.C., but they differed as to where they thought he might live. Witness 7 said they previously thought Mr. Phillips lived in Washington, D.C., but are now not sure.¹²⁷ Witness 1 said, “[h]is residence is, like, in North Florida, I believe, or South Georgia, somewhere down there. Plus, there may be somewhere that he’s [staying] in Atlanta.”¹²⁸ (For reference, Rep. Collins’s District is in northeastern Georgia, east of Atlanta.) Witness 3 stated, “I think he’s got – I can’t remember the name of the town that he’s from – but he’s got a house somewhere in South Georgia, and then I know he’s – I think he might stay with his girlfriend in Atlanta sometimes. But I don’t – I don’t know exactly where he lives. ... I know he’s got a house. ... I was just saying that I know that he stays in Atlanta, has a house in South Georgia, and from what I understand, maybe a house in Tallahassee as well in Florida. But I don’t know how often he spends in each of those places.”¹²⁹ Witness 4 said they did not know where the Chief of Staff resided when he was not working from Washington, D.C.¹³⁰
87. The OCC has identified property records that appear to be consistent with witness statements that Mr. Phillips may own property in northern Florida¹³¹ and southern Georgia,¹³² and Mr. Phillips did seek reimbursement from Rep. Collins’s MRA for travel to those areas on multiple occasions. For example, Mr. Phillips was reimbursed for Delta Airlines itineraries between Tallahassee, Florida, and Washington, D.C. (with a connection in Atlanta, Georgia) in June 2023.¹³³ In another instance, Mr. Phillips was reimbursed for “Private Auto Mileage” for a round trip from his address in Whigham, Georgia, to Rep. Collins’s District

¹²⁴ Witness 3 Transcript at 19:6-7.

¹²⁵ *Id.* at 20:21 – 21:1.

¹²⁶ Witness 2 Transcript at 16:1.

¹²⁷ OCC Staff Memorandum of Call with Witness 7 on June 2, 2025 (on file with the OCC).

¹²⁸ Witness 1 Transcript at 34:13-15.

¹²⁹ Witness 3 Transcript at 19:9-14, 19:19, 20:2-7.

¹³⁰ Witness 4 Transcript at 26:13.

¹³¹ Leon County, Florida, Property Record (listing owner as “Phillips Brandon C”) (Exhibit 8 at 25-7636_0118).

¹³² Grady County, Georgia, Property Record (listing owner as “Phillips Brandon C”) (Exhibit 9 at 25-7636_0122).

The same address in Whigham, Georgia, is listed as Mr. Phillips’s address on a lodging receipt from the Ritz Carlton in Pentagon City that Mr. Phillips submitted for reimbursement in early 2024. *See* B. Phillips 1/29 – 2/2 Ubers and lodging | Expense Report #141509 (Exhibit 18 at 25-7636_164).

¹³³ *See* (“B. Phillips June Flights | Expense Report #90203 | Expensed By: Brandon Phillips” (including airfare expense from Tallahassee, Florida, to Washington, D.C.) (Exhibit 10 at 25-7636_0127); B. Phillips June Flights | Expense Report #88226 | Expensed By: Brandon Phillips” (including airfare expense from Washington, D.C. to Tallahassee, Florida, and from Tallahassee, Florida, to Washington, D.C. (Exhibit 11 at 25-7636_0131).

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Office in Monroe, Georgia for “[o]fficial meeting with constituents” on December 20, 2023.¹³⁴ Shortly thereafter, Mr. Phillips was also reimbursed for a night of hotel lodging in Whigham, Georgia, on December 30, 2023.¹³⁵ A subsequent reimbursement for “Private Auto Mileage” for another round trip between Whigham and Monroe did not state an official meeting as its purpose.¹³⁶ (As noted in the Members’ Congressional Handbook, “[o]fficial travel must originate and terminate in either Washington, D.C., the Member’s District, or another location of official business except where otherwise stipulated in the Handbook.”¹³⁷)

The image is a screenshot of a property tax record summary. It contains the following information:

- Summary**
- Parcel ID:** [REDACTED]
- Location:** [REDACTED]
- Subdivision Name:** RUNNYMEDE UNIT NO 2
- Owner(s):** PHILLIPS BRANDON C
- Property Use:** 0100 - SINGLE FAMILY RESIDENTIAL
- Tax District:** 2 - COUNTY
- Mailing Address:** [REDACTED]
TALLAHASSEE FL 32303
- Legal Desc:** RUNNYMEDE UNREC
[REDACTED]
- [View All Legal](#)
- Acreage:** 0.38 ±
- Parent Parcel ID:** None

Figure 3. Excerpt of Exhibit 8, a property tax record listing Brandon C. Phillips as the owner of property in northern Florida (Tallahassee), where Witness 1 and Witness 3 indicated Mr. Phillips may have a residence.

¹³⁴ See Brandon Phillips - Mileage 12/20 | Expense Report #133069 | Expensed By: Brandon Phillips (Exhibit 12 at 25-7636_0135).

¹³⁵ See Phillips - Hotel 12/30 | Expense Report #137814 | Expensed By: Brandon Phillips (Exhibit 13 at 25-7636_0139).

¹³⁶ See B. Phillips - Mileage 2/20/24 | Expense Report #163447 | Expensed By: Brandon Phillips (Exhibit 14 at 25-7636_0143 - 0144).

¹³⁷ *Members’ Handbook* at 40.

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Grady County, GA

Assessment Notice

2025 Assessment Notice (PDF)

Summary

Parcel Number	[REDACTED]
Location Address	[REDACTED]
Legal Description	N/A
Class	R4-Residential
	(Note: This is for tax purposes only. Not to be used for zoning.)
Tax District	COUNTY (District 03)
Millage Rate	27.45
Acres	8.6
Homestead Exemption	No (50)
Landlot/District	53 / 16

[View Map](#)

Owner

PHILLIPS BRANDON C
[REDACTED]
WHIGHAM, GA 39897

Figure 4. Excerpt of Exhibit 9, a property tax record listing Brandon C. Phillips as the owner of property in southern Georgia (Whigham), where Witness 1 and Witness 3 indicated Mr. Phillips may also have a residence.

88. As noted above, an “employee’s primary duty station is either the employing Member’s district or Washington, D.C.,”¹³⁸ and “[c]ommuting expenses (local transportation expenses incurred by the ... employee while commuting between their residence and duty station) are not reimbursable, except in extraordinary circumstances”¹³⁹ Not only did Witness 1 and Witness 3 both indicate that Mr. Phillips may reside in northern Florida or southern Georgia, but Mr. Phillips appears to have been reimbursed for travel to and/or from those areas, and for lodging in Washington D.C.,¹⁴⁰ Whigham, Georgia,¹⁴¹ and Atlanta, Georgia¹⁴²—adjacent to Rep. Collins’s District—raising the question whether all of those expenses were properly reimbursable from Rep. Collins’s MRA.¹⁴³
89. Because Mr. Phillips was (and is) Rep. Collins’s Chief of Staff, other members of Rep. Collins’s staff reported to him and did not have visibility into the purposes of his travel. For example, when asked a series of questions about Mr. Phillips’s travel and expense reimbursements, Witness 3 said, “... I don’t know who, how, what he requests

¹³⁸ *Members’ Handbook* at 39.

¹³⁹ *Id.* at 40.

¹⁴⁰ *See, e.g.,* B. Phillips – Lodging 2/13 – 2/16 | Expense Report #145013 | Expensed By: Brandon Phillips (Exhibit 15 at 25-7636_0148).

¹⁴¹ *See supra* note 135 and accompanying text.

¹⁴² *See, e.g.,* B. Phillips Uber and lodging 2/13 – 2/16 | Expense Report #144639 | Expensed By: Brandon Phillips (including charges at The Westin Peachtree Plaza in Atlanta, Georgia) (Exhibit 16 at 25-7636_0155).

¹⁴³ *See Members’ Handbook* at 39; *see supra* text accompanying notes 125-26

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reimbursements for, what, you know, when he's going or what the purposes are.”¹⁴⁴ Witness 2 said that, with the exception of a single trip they were aware of, they did not know the specific purposes of Mr. Phillips's trips.¹⁴⁵

90. Multiple witnesses indicated that, as Chief of Staff, Mr. Phillips would have been responsible for reviewing and approving his own expenses. Witness 3 was asked if they had any involvement in that process at all, and they said, “No, I don't approve expense reimbursements. ... It goes through Brandon [Phillips] and our financial administrator.”¹⁴⁶ Witness 1 noted that, as Chief of Staff, Mr. Phillips would have been solely responsible for approving his own expenses:

Q. ... Did anyone else have to approve reimbursement requests that Mr. Phillips submitted?

A. No. Pretty much, when you're the chief, you don't answer to anyone other than the [M]ember, and most members aren't paying attention to those details.¹⁴⁷

91. Like the questions of his primary duty station and residence, the question of the purposes of Mr. Phillips's specific trips is relevant to determining the legitimacy of the reimbursements that Mr. Phillips sought and obtained from Rep. Collins's MRA.
92. Overall, the information described above does not clearly substantiate or clearly disprove the allegation that Mr. Phillips obtained reimbursement from the MRA for non-official travel. Although members of Congress do have some “discretion to define the parameters of an employee's responsibilities as long as those responsibilities related to the congressman's ‘official and representative duties,’”¹⁴⁸ that discretion is not unlimited, and the reimbursement of expenses from MRA funds must always adhere to certain rules.¹⁴⁹ Practically speaking, Mr. Phillips's position as Rep. Collins's Chief of Staff meant that no other employees of Rep. Collins were necessarily aware of the purpose of any given trip that Mr. Phillips took or were involved in approving his travel expenses.
93. Notwithstanding the repeated and factually similar allegations in the submissions received by the OCC, as well as the witness information outlined above, without any direct cooperation from Mr. Phillips or Rep. Collins, the OCC was not able to reach a determination at this time

¹⁴⁴ Witness 3 Transcript at 22:7-10.

¹⁴⁵ Witness 2 Transcript at 16:22 – 17:5 (“Q. Were you aware of the ... specific purposes of trips that he took for work? A. I know he went to the Congressional Institute's Chief of Staff Retreat. Beyond that, I don't know.”).

¹⁴⁶ Witness 3 Transcript at 17:18-22. Witness 3 also specifically denied any role in approving staff travel expenses. *See Id.* at 18:5-7.

¹⁴⁷ Witness 1 Transcript at 37:21 – 38:5.

¹⁴⁸ House Ethics Manual at 290 (internal quotation marks omitted).

¹⁴⁹ “Commuting expenses,” for example, are generally not reimbursable outside of “extraordinary circumstances.” *Members' Handbook* at 40. Although not dispositive, one witness, Witness 2, actually described Mr. Phillips's travel to and from Washington, D.C. as commuting: “So, my recollection is that he commuted back and forth when we were in session and the congressman was here. He was up in [D.C.] when he was not. He split his time between Atlanta and Tallahassee and South Georgia.” Witness 2 Transcript at 17:9 – 17:13.

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- iv. The Submissions Further Allege that Mr. Phillips May Have Received a House Salary at a Time When He Was Not Actually Working for Rep. Collins's Office, and That He May Have Used House Resources for Campaign Activity.

94. The September 6, 2024 submission separately alleges that:

Mr. Phillips has not been in the DC office the entire month of August. I am unsure if he is getting a full paycheck or took leave, however, he is working full time on campaigns throughout the country. He is a senior staff member making more than the allowed limit.

... In addition, Mr. Phillips blatantly uses office time to work on campaign related initiatives to include fundraising, social media, phone calls, meetings.¹⁵⁰

95. The September 7, 2024 submission similarly alleges that:

He also has not physically been in the D.C. office for over 2 months. Now, I am unsure if he has taken leave as required, but he is working on campaign related work and not official. It must be investigated if he is still collecting a full paycheck from the House.¹⁵¹

96. The OCC reviewed official Statements of Disbursements of the House and confirmed that Mr. Phillips received a House salary for the third quarter of 2024 (July 1, 2024 to September 30, 2024) of \$48,750.00—approximately the same as his salary for the second and fourth quarters of 2024—during a period when the submissions allege Mr. Phillips spent a significant amount of time away from his duty station for campaign work.¹⁵²

97. Information provided by the witnesses the OCC spoke with did not clearly substantiate, but also did not disprove, the above allegations.

98. Witness 2, for example, said they did not know whether Mr. Phillips ever took leave from his job to do campaign work for Rep. Collins or on any other campaign.¹⁵³ When asked if they were aware of Mr. Phillips doing campaign work or other outside work when he was working in Rep. Collins's D.C. Office, Witness 2 at first noted, "I believe he was doing some things for the campaign – Mr. Collins's campaign. I know he would go across the street to Capitol Hill Club and stuff for meetings."¹⁵⁴ However, when the OCC clarified that they were asking only about activities when Mr. Phillips was in the office, not if he left the office, Witness 2 said, "... as far as in the office, I don't – I don't know."¹⁵⁵

¹⁵⁰ Electronic form submission to OCC dated September 6, 2024.

¹⁵¹ Electronic form submission to OCC dated September 7, 2024.

¹⁵² Statement of Disbursements of the House (July 1, 2023, to September 30, 2023).

¹⁵³ Witness 2 Transcript at 20:1-7.

¹⁵⁴ *Id.* at 19:13-16.

¹⁵⁵ *Id.* at 19:21-22.

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99. Witness 3 told the OCC that they did not believe Mr. Phillips had taken leave from his job as chief of staff to do outside campaign work.¹⁵⁶ When asked if they were aware of Mr. Phillips doing campaign work while in his House office, Witness 3 said, “I mean, not that I’ve seen, but I don’t, I mean, I can’t tell. He’s got a door, so I don’t – I don’t know.”¹⁵⁷
100. Witness 4 said they “did not have access to [Mr. Phillips’s] daily calendar, but as far as I know, there was never any extended leave of absences, times when he was not responsible for the duties of chief of staff.”¹⁵⁸ When asked if they were aware of Mr. Phillips doing outside campaign work on the occasions when he was in the District Office, Witness 4 said, “I do not know.”¹⁵⁹
101. Witness 7 said that Mr. Phillips’s posts on the social media platform Twitter (now known as X) gave them the impression that there were periods of time when Mr. Phillips, while continuing to draw his House salary and not taking leave from his House employment, nevertheless engaged in personal activities or was involved in campaign activities.¹⁶⁰ As an example, Witness 7 cited the period leading up to the 2024 election, when they did not believe Mr. Phillips was in the office for about a month, and noted that his Twitter posts during that time indicated he was taking personal time and had been at a presidential campaign event.¹⁶¹ Although Witness 7 did not indicate any specific dates or posts, the OCC was able to identify at least one post from July 2024 that may be among the posts Witness 7 was referencing:

¹⁵⁶ See Witness 3 Transcript at 23:13-18.

¹⁵⁷ *Id.* at 23:7-9.

¹⁵⁸ Witness 4 Transcript at 26:20 – 27:1.

¹⁵⁹ *Id.* at 27:12.

¹⁶⁰ OCC Staff Memorandum of Call with Witness 7 on June 2, 2025 (on file with the OCC).

¹⁶¹ *Id.*

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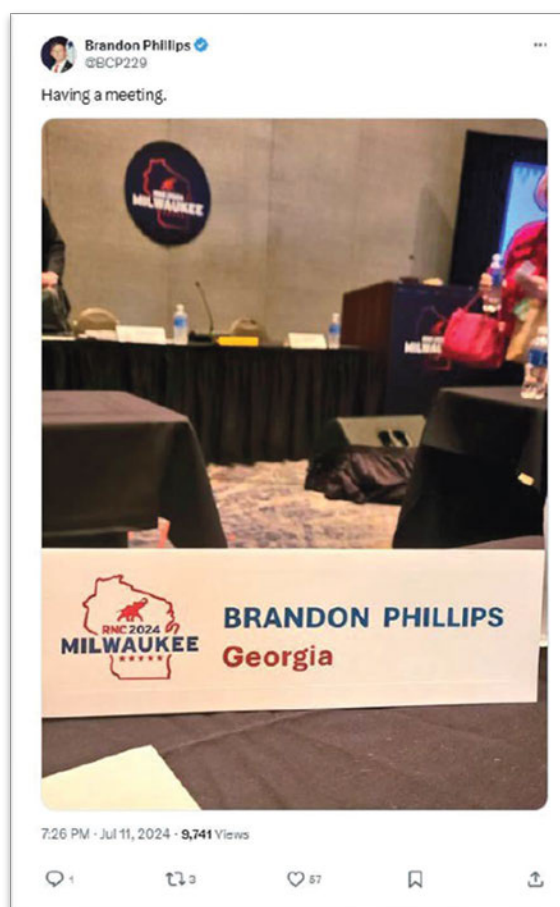


Figure 3. Exhibit 17, a post on X by Brandon Phillips dated Thursday, July 11, 2024, which appears to indicate that Mr. Phillips was attending a campaign or political meeting on that date.

102. The testimony of Witness 1 captures the challenge the OCC faced in trying to evaluate the allegations concerning Mr. Phillips’s receipt of a House salary while traveling for political activities and/or using House office resources for campaign work. When asked if they were aware of Mr. Phillips taking leave to do campaign work, Witness 1 said, “I’m not aware. If he took leave, he didn’t tell us he was going on leave.”¹⁶² And when asked about Mr. Phillips doing campaign work in 2023 or 2024, Witness 1 responded,

It appeared that he was doing some things. I mean, he was definitely doing Congressman Collins' [sic] campaign. And at a minimum, he was helping other -- being helpful to other campaigns, ... *But it was never clear when he was doing official versus when he was doing campaign. You know, it was unclear.*¹⁶³

¹⁶² Witness 1 Transcript at 38:9-11.

¹⁶³ *Id.* at 38:20 – 39:7 (emphasis added).

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103. Overall, the information provided by the above witnesses does not clearly substantiate or clearly disprove the allegations concerning Mr. Phillips's possible use of House resources for campaign purposes. Practically speaking, Mr. Phillips's position as Rep. Collins's Chief of Staff meant that no other employees of Rep. Collins were involved in supervising Mr. Phillips's work or work schedule or approving his expenses. Nor were any other employees necessarily privy to the duration or purpose of any leave he took during the period in question in 2024.
104. Notwithstanding the repeated and factually similar allegations in the submissions received by the OCC, as well as the witness information outlined above, without any direct cooperation from Mr. Phillips or Rep. Collins, the OCC was not able to reach a determination at this time on whether there is a substantial reason to believe the additional allegations concerning Mr. Phillips's possible use of House resources for campaign purposes.

* * *

105. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Collins used congressional resources for unofficial or otherwise unauthorized purposes.
106. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Collins retained an employee who did not perform duties commensurate with the compensation the employee received.
107. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Collins discriminated unfairly by dispensing special favors or privileges by retaining an employee with whom his Chief of Staff had a personal relationship.

III. INDIVIDUALS WHO REFUSED TO COOPERATE WITH THE OCC REVIEW

108. In the course of its review, the OCC issued five formal Requests for Information ("RFIs") and ten formal Requests for Interviews to individuals believed to have information relevant to the review. The five individuals listed in the first paragraph of Section V below declined to provide the information, documents, or testimony sought by the OCC or even acknowledge receipt of the OCC's requests by signing and returning the OCC's standard Acknowledgement forms.
109. The OCC successfully made initial contact with Rep. Collins by telephone on May 27, 2025, and notified him of the OCC Board's initiation of a preliminary review. Following that telephone call, the OCC sent its standard initial notices—including the Statement of the Nature of the Review, a formal RFI, as well as Acknowledgment forms seeking his confirmation of receipt of those two documents—to an e-mail address designated by Rep. Collins. Since the initial telephone call between Rep. Collins and the OCC, Rep. Collins has not responded to any communications or requests from the OCC. When the second-phase review concluded on August 18, 2025, Rep. Collins had not responded to the OCC's initial RFI. Rep. Collins also has not responded to or acknowledged any of the OCC's subsequent notices (including the Second-Phase Review Notices sent on June 23, 2025, the Non-

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended Cooperation & Negative Inference Letter sent on August 6, 2025, or the Notice of Right to Appear sent on September 9, 2025).

110. As explained above in Section I.C, in parallel with its review of this matter, the OCC Board initiated a distinct but factually congruent review focused on the same general allegations as they pertain to Brandon Phillips, Rep. Collins's Chief of Staff. In connection with that review, the OCC first attempted to make contact with Mr. Phillips using his House e-mail address to notify him of the initiation of a preliminary review. Those attempts, on May 22 and 23, 2025, were unsuccessful. On May 28, 2025, the OCC hand-delivered its standard initial notices—including the Statement of the Nature of the Review, a formal RFI, as well as Acknowledgment forms seeking his confirmation of receipt of those two documents—to Mr. Phillips at Rep. Collins's Washington, D.C. Office, where the notice package was received and signed for by another member of Rep. Collins's staff. To date, the OCC has not received a response or acknowledgement of any kind from Mr. Phillips. When the second-phase review concluded on August 18, 2025, Mr. Phillips had not responded to the OCC's initial RFI. Mr. Phillips also has not responded to or acknowledged any of the OCC's subsequent notices (including the Second-Phase Review Notices sent on June 23, 2025, the Non-Cooperation & Negative Inference Letter sent on August 6, 2025, or the Notice of Right to Appear sent on September 9, 2025).
111. Rep. Collins and Mr. Phillips repeatedly declined to respond to or even acknowledge the OCC's notices, formal requests, and other communications, and in so doing, they refused to cooperate with OCC Rev. No. 25-7636 and OCC Rev. No. 25-7735, respectively.
112. During the review, the OCC also issued formal Requests for Interviews sent to Kevin Mason, who at relevant times served as Deputy District Director for Rep. Collins; John Ferland, a former Financial Administrator in Rep. Collins's Washington, D.C. Office; and Monica Burton, a former Financial Assistant in Rep. Collins's Washington, D.C. Office. All three are believed to have information relevant to the review, in particular to the hiring of Caroline Craze, her classification as a "District Office Paid Intern," and her payment out of Rep. Collins's MRA. None of the three responded to or acknowledged the OCC's formal interview requests, and in so doing, they refused to cooperate with the review.
113. The OCC made multiple good-faith attempts to contact Ms. Craze for the purpose of seeking documents and information in connection with the review. On June 6, 2025, during the preliminary review, the OCC attempted to contact Ms. Craze by sending an e-mail to an address believed to be Ms. Craze's work e-mail address. On August 11, 2025, during the second-phase review, the OCC attempted to contact Ms. Craze by calling and leaving a voicemail message on a telephone line believed to be Ms. Craze's personal mobile telephone. Neither attempt elicited a response from Ms. Craze. Although the OCC does not know whether Ms. Craze received its messages—and is therefore not able to say whether Ms. Craze intentionally did not cooperate with the OCC's review—because she is certain to have information highly relevant to the review, the OCC Board nevertheless recommends that the Committee on Ethics issue a subpoena to Ms. Craze.

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

IV. CONCLUSION

114. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Collins used congressional resources for unofficial or otherwise unauthorized purposes.
115. Accordingly, the Board recommends that the Committee further review the above allegation that Rep. Collins used congressional resources for unofficial or otherwise unauthorized purposes.
116. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Collins retained an employee who did not perform duties commensurate with the compensation the employee received.
117. Accordingly, the Board recommends that the Committee further review the above allegation that Rep. Collins retained an employee who did not perform duties commensurate with the compensation the employee received.
118. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Collins discriminated unfairly by dispensing special favors or privileges by retaining an employee with whom his Chief of Staff had a personal relationship.
119. Accordingly, the Board recommends that the Committee further review the above allegation that Rep. Collins discriminated unfairly by dispensing special favors or privileges by retaining an employee with whom his Chief of Staff had a personal relationship.

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

120. The following witnesses, by declining to provide requested information and/or testimony to the OCC, did not cooperate with the OCC review:
 - a. Rep. Michael Collins;
 - b. Brandon Phillips;
 - c. Kevin Mason;
 - d. John Ferland; and
 - e. Monica Burton.
121. The Board recommends that the Committee on Ethics issue subpoenas to:
 - a. Rep. Michael Collins;
 - b. Brandon Phillips;
 - c. Caroline Craze;
 - d. Kevin Mason;
 - e. John Ferland; and
 - f. Monica Burton.