

CONFIDENTIAL

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

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

REPORT

Review No. 19-3824

The Board of the Office of Congressional Ethics (hereafter “the Board”), by a vote of no less than four members, on January 31, 2020, adopted the following report and ordered it to be transmitted to the Committee on Ethics of the United States House of Representatives (hereafter “the Committee”).

SUBJECT: Representative Sanford Bishop, Jr.

NATURE OF THE ALLEGED VIOLATION: Rep. Sanford Bishop’s campaign committee, Sanford Bishop for Congress, reported campaign disbursements that may not be legitimate and verifiable campaign expenditures attributable to bona fide campaign or political purposes. If Rep. Bishop converted campaign funds from Sanford Bishop for Congress to personal use, or if Rep. Bishop’s campaign committee expended funds that were not attributable to bona fide campaign or political purposes, then Rep. Bishop may have violated House rules, standards of conduct, and federal law.

Rep. Sanford Bishop may have improperly spent a portion of his Members’ Representational Allowance (MRA) on annual holiday gatherings held in his District. If Rep. Bishop spent MRA funds on annual holiday celebrations, then Rep. Bishop may have violated House rules, standards of conduct, and federal law.

RECOMMENDATION: The Board recommends that the Committee further review the above allegation concerning Rep. Sanford Bishop, Jr. because there is substantial reason to believe that Rep. Bishop converted campaign funds from Sanford Bishop for Congress to personal use, or Rep. Bishop’s campaign committee expended funds that were not attributable to bona fide campaign or political purposes.

The Board recommends that the Committee further review the above allegation concerning Rep. Sanford Bishop, Jr. because there is substantial reason to believe that Rep. Bishop spent a portion of his MRA on annual holiday celebrations.

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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FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 19-3824

On January 31, 2020, the Board of the Office of Congressional Ethics (hereafter “the Board”) adopted the following findings of fact and accompanying citations to law, regulations, rules and standards of conduct (*in italics*). The Board notes that these findings do not constitute a determination of whether or not a violation actually occurred.

I. INTRODUCTION

A. Summary of Allegations

1. In this review, the Office of Congressional Ethics (OCE) examined whether Rep. Bishop or his campaign committee, Sanford Bishop for Congress, reported certain disbursements that may not be legitimate and verifiable campaign expenditures attributable to bona fide campaign or political purposes.
2. The OCE determined that Rep. Bishop and his campaign committee misspent campaign funds on various personal expenses. Specifically, the OCE found evidence that the Sanford Bishop for Congress campaign committee likely spent tens of thousands of dollars in campaign funds on fuel, golf expenses, meals, travel, tuition, and entertainment that likely were personal in nature.
3. Additionally, throughout the course of this review, it became apparent to both Rep. Bishop and the OCE that his former campaign committee treasurer, who held the position from 1993 until the fall of 2019, had failed to perform her duties as treasurer in various important ways. Specifically, the review yielded evidence indicating the former treasurer had, at least in recent years: (a) neglected to appropriately collect and store campaign records, (b) intentionally misreported disbursement information on Federal Election Commission (FEC) filings, and (c) may have intentionally converted campaign funds to her personal use. Since at least 2016, the former treasurer had been suffering from a variety of serious health problems, and it is unclear the extent to which these ailments contributed to the issues identified above.
4. The OCE also obtained evidence suggesting Rep. Bishop may have spent Members’ Representation Allowance (MRA) funds on an annual holiday celebration in violation of House rules, standards of conduct, and federal law.
5. Rep. Bishop acknowledged that some of the spending identified above was improper and he exhibited a genuine desire to correct certain issues that arose during the course of this review; however, he also denied any impropriety with respect to other potentially problematic expenditures. Although Rep. Bishop cooperated with the review, the state of campaign records and the former treasurer’s health prevented Rep. Bishop from producing all requested

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documents and also prevented Rep. Bishop and the OCE from determining with specificity whether and to what extent certain spending was permissible or impermissible. Below are the issues considered during the course of this review and the Board's decision on whether to recommend them for further review or dismissal:

6. Rep. Sanford Bishop's campaign committee, Sanford Bishop for Congress, reported campaign disbursements that may not be legitimate and verifiable campaign expenditures attributable to bona fide campaign or political purposes. If Rep. Bishop converted campaign funds from Sanford Bishop for Congress to personal use, or if Rep. Bishop's campaign committee expended funds that were not attributable to bona fide campaign or political purposes, then Rep. Bishop may have violated House rules, standards of conduct, and federal law.
7. The Board recommends that the Committee further review the above allegation concerning Rep. Bishop because there is substantial reason to believe that Rep. Bishop converted campaign funds from Sanford Bishop for Congress to personal use, or Rep. Bishop's campaign committee expended funds that were not attributable to bona fide campaign or political purposes.
8. Rep. Sanford Bishop may have spent a portion of his MRA on annual holiday gatherings held in his District. If Rep. Bishop spent MRA funds on annual holiday celebrations, then Rep. Bishop may have violated House rules, standards of conduct, and federal law.
9. The Board recommends that the Committee further review the above allegation concerning Rep. Bishop because there is substantial reason to believe that Rep. Bishop spent a portion of his MRA on annual holiday celebrations.

B. Jurisdiction Statement

10. The allegations that were the subject of this review concern Rep. Sanford Bishop, Jr., a Member of the United States House of Representatives from the 2nd Congressional District of Georgia. The Resolution the United States House of Representatives adopted creating the OCE 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. Because the conduct under review occurred after March 11, 2008, review by the Board is in accordance with the Resolution.

C. Procedural History

11. The OCE received a written request for preliminary review in this matter signed by at least two members of the Board on September 13, 2019. The preliminary review commenced on September 14, 2019.²

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 OCE. The request for a preliminary review is received by the OCE 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.

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12. On September 16, 2019, the OCE notified Rep. Bishop 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
13. At least three members of the Board voted to initiate a second-phase review in this matter on October 11, 2019. The second-phase review commenced on October 14, 2019.⁴ The second-phase review was scheduled to end on November 27, 2019.
14. On October 15, 2019, the OCE notified Rep. Bishop 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
15. The Board voted to extend the second-phase review by an additional period of fourteen days on November 13, 2019. The additional period ended on December 11, 2019.
16. On January 8, 2020, Rep. Bishop notified the OCE that he secured counsel in this matter.⁶
17. The Board voted to refer the matter to the Committee on Ethics for further review and adopted these findings on January 31, 2020.
18. The report and its findings in this matter were transmitted to the Committee on Ethics on February 10, 2020.

D. Summary of Investigative Activity

19. The OCE requested documentary and in some cases testimonial information from the following sources:
 - (1) Rep. Bishop;⁷
 - (2) Treasurer, Sanford Bishop for Congress (Current Treasurer);
 - (3) Controller, Green Island Country Club (GICC Controller);
 - (4) Golf Pro, Green Island Country Club (GICC Golf Pro);
 - (5) Banquet Coordinator, Green Island Country Club (GICC Banquet Coordinator);
 - (6) Membership Coordinator, Stonebridge Golf and Country Club (SGCC Membership Coordinator);
 - (7) Golf Pro, Stonebridge Golf and Country Club (SGCC Golf Pro);
 - (8) The Caleris Companies, LLC (d/b/a Kwik Kopy Printing);

³ Letter from Omar S. Ashmawy, Chief Counsel and Staff Dir., Office of Cong. Ethics, to Rep. Sanford Bishop, Jr., September 16, 2019.

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. Ethics, to Rep. Sanford Bishop, Jr., October 15, 2019.

⁶ Letter from Rep. Sanford Bishop, Jr. to Omar S. Ashmawy, Chief Counsel and Staff Dir., Office of Cong. Ethics, January 6, 2020. This letter was sent via email to the OCE on January 8, 2020.

⁷ The Request for Information directed to Rep. Bishop sought information from him in his personal capacity and from his congressional campaign committee, Sanford Bishop for Congress.

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- (9) American Express;
- (10) SunTrust Bank; and
- (11) Synovus Bank (formerly Columbus Bank & Trust).

20. The following entity refused to cooperate with the OCE's review:

- (1) Synovus Bank.

II. REP. BISHOP MAY HAVE CONVERTED CAMPAIGN FUNDS TO PERSONAL USE

A. Applicable Law, Rules, and Standards of Conduct

21. Federal Law

52 U.S.C. § 30114(b)(1)

“A contribution or donation [to a candidate for Congress] shall not be converted by any person to personal use.”

52 U.S.C. § 30114(b)(2)(D)

“[A] contribution or donation shall be considered to be converted to personal use if the contribution or amount is used to fulfill any commitment, obligation, or expense of a person that would exist irrespective of the candidate's election campaign or individual's duties as a holder of Federal office, including—

- (A) a home mortgage, rent, or utility payment;*
- (B) a clothing purchase;*
- (C) a noncampaign-related automobile expense;*
- (D) a country club membership;*
- (E) a vacation or other noncampaign-related trip;*
- (F) a household food item;*
- (G) a tuition payment;*
- (H) admission to a sporting event, concert, theater, or other form of entertainment not associated with an election campaign; and*
- (I) dues, fees, and other payments to a health club or recreational facility.”*

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22. Federal Regulations

11 C.F.R. § 113.1(g) FEC Personal Use Definition

“(g) Personal use means any use of funds in a campaign account of a present or former candidate to fulfill a commitment, obligation or expense of any person that would exist irrespective of the candidate’s campaign or duties as a Federal officeholder.

(1)(i) Personal use includes but is not limited to the use of funds in a campaign account for any item listed in paragraphs (g)(1)(i)(A) through (J) of this section:

(A) Household food items or supplies.

(B) Funeral, cremation or burial expenses except those incurred for a candidate (as defined in 11 CFR 100.3) or an employee or volunteer of an authorized committee whose death arises out of, or in the course of, campaign activity.

(C) Clothing, other than items of de minimis value that are used in the campaign...

(D) Tuition payments, other than those associated with training campaign staff.

(E) Mortgage, rent or utility payments...

(F) Admission to a sporting event, concert, theater or other form of entertainment, unless part of a specific campaign or officeholder activity.

(G) Dues, fees or gratuities at a country club, health club, recreational facility or other nonpolitical organization, unless they are part of the costs of a specific fundraising event that takes place on the organization’s premises.

(H) Salary payments to a member of the candidate’s family, unless the family member is providing bona fide services to the campaign. ...

(I) Salary payments by a candidate’s principal campaign to a candidate [meeting certain requirements];

(J) A vacation.”

“The Commission will determine, on a case-by-case basis, whether” the following constitute personal use:

“(A) Legal expenses;

(B) Meal expenses;

(C) Travel expenses, including subsistence expenses incurred during travel. If a committee uses campaign funds to pay expenses associated with travel that involves both personal activities and campaign or officeholder-related activities, the incremental expenses that result from the personal activities are personal use, unless the person(s) benefiting from this use reimburse(s) the campaign account within thirty days for the amount of the incremental expenses, and

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(D) Vehicle expenses, unless they are a de minimis amount. If a committee uses campaign funds to pay expenses associated with a vehicle that is used for both personal activities beyond a de minimis amount and campaign or officeholder-related activities, the portion of the vehicle expenses associated with the personal activities is personal use, unless the person(s) using the vehicle for personal activities reimburse(s) the campaign account within thirty days for the expenses associated with the personal activities.”

60 Fed. Reg. 7861, 7866 (Feb. 9, 1995), Final Rule Re: Personal Use of Campaign Funds, Dues Fees and Gratuities

“Under this rule, membership dues, greens fees, court fees or other payments for access to [country] clubs are personal use, as are payments to caddies or professionals who provide services at the club, regardless of whether they are club employees or independent contractors. However, this rule contains an exception that allows a candidate holding a fundraising event on club premises to use campaign funds to pay the cost of the event. In this situation, the payments would be expenditures rather than personal use. . . . However, this exception does not cover payments made to maintain unlimited access to such a facility, even if access is maintained to facilitate fundraising activity. The exception is limited to payments for the costs of a specific fundraising event.”

60 Fed. Reg. 7861, 7868 (Feb. 9, 1995), Final Rule Re: Personal Use of Campaign Funds, Meal Expenses

“The Commission is aware of the potential for abuse in the use of campaign funds to pay for meal expenses. However, the Commission sought to establish a rule that would effectively curb these abuses without making it difficult to conduct legitimate campaign or officeholder related business. Consequently, the Commission has decided to address these situations on a case by case basis using the general definition of personal use. Under this approach, the use of campaign funds for meals involving face to face fundraising would be permissible. Presumably, the candidate would not incur the costs associated with this activity if he or she were not a candidate. In contrast, the use of campaign funds to take the candidate’s family out to dinner in a restaurant would be personal use, because the family’s meal expenses would exist even if no member of the family were a candidate or an officeholder.”⁸

60 Fed. Reg. 7861, 7868 (Feb. 9, 1995), Final Rule Re: Personal Use of Campaign Funds, Vehicle Expenses

“[V]ehicle expenses that would exist irrespective of the candidate’s campaign or duties as a holder of Federal office will be personal use, unless they are a de minimis amount. If these expenses exceed a de minimis amount, the person(s) using the vehicle for personal purposes must reimburse the committee for the entire amount associated with the personal use. . . . The

⁸ “It should be noted that this provision applies to meal expenses incurred outside the home. It does not apply to the use of campaign funds for household food items, which are covered by section 113.1(g)(1)(i)(A),” and defined as *per se* personal use. See 60 Fed. Reg. 7861, 7868 (Feb. 9, 1995), Final Rule Re: Personal Use of Campaign Funds, Meal Expenses.

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Commission is sensitive to the difficulties that candidates and committees would face in completely eliminating all vehicle uses that confer a personal benefit. Consequently, the Commission has sought to carefully craft a rule that will provide a mechanism for addressing apparent abuses of campaign vehicles without imposing unrealistic burdens on candidates and committees. The Commission has decided . . . to review the facts of a particular case in order to determine whether personal use has occurred. The Commission will make use of the de minimis concept by assessing whether the amount of expenses associated with personal activities is significant in relation to the overall vehicle use.”

11 C.F.R. § 106.3(b)(2-3) Allocation of Expenses Between Campaign and Non-Campaign Related Travel

“(b)(2) Where a candidate’s trip involves both campaign-related and non-campaign-related stops, the expenditures allocable for campaign purposes are reportable, and are calculated on the actual cost-per-mile of the means of transportation actually used, starting at the point of origin of the trip, via every campaign-related stop and ending at the point of origin.

(b)(3) Where a candidate conducts any campaign-related activity in a stop, the stop is a campaign-related stop and travel expenditures made are reportable. Campaign-related activity shall not include any incidental contacts.”

23. House Rules

House Rule 23, clause 6 states: “A Member, Delegate, or Resident Commissioner— (a) shall keep the campaign funds of such individual separate from the personal funds of such individual; (b) may not convert campaign funds to personal use in excess of an amount representing reimbursement for legitimate and verifiable campaign expenditures; and (c) except as provided in clause 1(b) of rule XXIV, may not expend funds from a campaign account of such individual that are not attributable to bona fide campaign or political purposes.”

24. House Ethics Manual

*The House Ethics Manual states, “[a] Member’s use of campaign funds for federal office is permissible only if it complies with the provisions of **both** the House Rules **and** [the Federal Election Campaign Act].”⁹*

*The House Ethics Manual further explains, “Campaign funds are **not** to be used to enhance a Member’s lifestyle, or to pay a Member’s personal obligations. Members have wide discretion in determining what constitutes a bona fide campaign or political purpose to which campaign funds and resources may be devoted, but Members have **no** discretion whatsoever to convert campaign funds to personal use. Furthermore, House rules require that Members be able to verify that campaign funds have not been used for personal purposes.”¹⁰*

⁹ House Ethics Manual (2008) (“Manual”) at 152 (emphasis in original).

¹⁰ *Id.* at 173 (emphasis in original).

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*With respect to verification, the Manual emphasizes the following: “This requirement that the proper purpose of each outlay be ‘verifiable’ is a commonsense requirement. With the huge number of outlays that Members’ campaigns typically make, often on a nearly continuous basis, the propriety of particular outlays may not be subject to review for months or years after the fact, when recollections as to the circumstances or specific purposes of an outlay may well have faded. Absent a requirement for verification, the prohibition against converting campaign funds to personal use would be nullified in substantial part. Furthermore, the verification requirement should serve to cause Members and their campaign staffs to exercise caution in spending campaign funds, and to ensure that no outlay is for an impermissible personal purpose. **Members and their campaign staffs should bear in mind that the verification requirement imposed by the House rules is separate from, and in addition to, whatever recordkeeping requirements are imposed by the Federal Election Commission on federal candidates generally.**”¹¹*

According to the House Ethics Manual, a Member “must take reasonable steps to ensure that any outside organization over which he or she exercises control – including the individual’s own authorized campaign committee ... operates in compliance with applicable law.”¹²

*The House Ethics Manual also states, “the [personal use] prohibition is against the use of campaign funds for personal purposes not only of the Member, but rather of **anyone.**”¹³*

House Ethics Manual Discussion of Campaign-Funded Country Club Payments

Regarding spending at country clubs, the Manual states the following: “Among the particular uses of campaign funds that are specified in the FEC regulations as constituting an impermissible personal use are payments for the following: . . . Dues, fees or gratuities at a country club, health club, recreational facility or other non-political organization, unless part of the costs of a specific fundraising event[.]”¹⁴

House Ethics Manual Discussion of Campaign-Funded Meals

Regarding meals, the Ethics Manual states: “Campaign funds may be used to pay for a meal in a number of circumstances, including, for example, a meal that constitutes a bona fide campaign fund-raising event, and a meal incident to a bona fide meeting on campaign business. Campaign funds may also be used to pay the meal expenses incurred when a Member or campaign worker is traveling on campaign business. Campaign funds may also be used to pay meal expenses when a Member has a social meal with constituents (other than personal friends or relatives of the Member) who are visiting Washington.”¹⁵

¹¹ *Id.* at 164-65 (emphasis in original).

¹² *Id.* at 123.

¹³ *Id.* at 166 (emphasis in original) (citing 2 U.S.C. §439(a)(b)(1) [transferred to 52 U.S.C. § 30114] for the proposition that funds may not be converted “by **any** person to any personal use.”) (emphasis in original).

¹⁴ *Id.* at 172.

¹⁵ *Id.* at 159.

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“However, use of campaign funds to pay for any meal when the only individuals present are a Member and the Member’s personal friends or relatives inherently raises concerns of conversion of campaign funds to personal use. The only circumstance in which payment for such a meal with campaign funds may be permissible is if the other attendees actively work in the Member’s campaign, and if the meal is merely incident to a meeting having a clear, specific agenda of campaign business.

In order to be able to verify that there was a proper campaign purpose for meal outlays, the Standards Committee strongly advises that campaign committees maintain records that note both the individuals who were present at each meal, and the specific campaign or political purpose served by the outlay. When the attendees include only friends or relatives, and the above-stated requirements for campaign payment for such a meal are satisfied, the maintenance of specific, written records is essential. In these circumstances, the records should specifically describe the campaign agenda of the meal. As with campaign outlays for travel, when the outlays for meals are frequent and extensive, the need to maintain specific, written records is paramount.”¹⁶

House Ethics Manual Discussion of Campaign-Funded Travel

With respect to travel, the Manual states: “Under House Rules, campaign funds may be used to pay travel expenses when the primary purpose of the trip is activity that serves a bona fide campaign or political purpose, provided that the outlays are limited to the expenses that are necessarily incurred in engaging in that activity. Thus, quite clearly, campaign funds may be used to pay the expenses of a trip the primary purpose of which is to attend a campaign or political event, or to engage in other campaign activity.”¹⁷

Regarding vehicle usage, the Ethics Manual explains: “It is permissible for a Member to lease or purchase a motor vehicle with campaign funds and to use that vehicle on an unlimited basis for travel for both campaign and official House purposes. Campaign funds may also be used to pay the expenses incurred in operating the vehicle, such as insurance, maintenance and repair, registration fees, and any property tax. However, when a vehicle that is paid for with campaign funds is used for personal purposes – i.e., for driving to and from one’s official or campaign office – it is necessary to reimburse the Member’s campaign committee in an appropriate amount with personal funds. Members should consult with the FEC on how the amount of reimbursement should be determined. FEC regulations provide that reimbursement should be made within 30 days of the personal use, and thus it appears that reimbursement for regular personal use must be made on a monthly basis.”¹⁸

The Manual recognizes the existence of mixed purpose trips, and explains the following: “[a] Member, officer, or employee must determine the primary purpose of the trip. The source associated with that primary purpose – for example, a political committee for campaign or political activity, the federal government for official business, or the traveler’s own funds for

¹⁶ *Id.* at 169-70.

¹⁷ *Id.* at 157.

¹⁸ *Id.* at 174-75.

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personal business – must pay for the airfare (or other long-distance transportation expense), and all other travel expenses incurred in accomplishing that purpose. Any additional meal, lodging, or other travel expenses that the Member or staff person incurs in serving a secondary purpose must be paid by the source associated with that secondary purpose. The determination of the primary purpose of a trip must be made in a reasonable manner, and one relevant factor in making that determination is the number of days to be devoted to each purpose. That is, often the primary purpose of a trip is the one to which the greater or greatest number of days is devoted.”¹⁹

B. Background on Sanford Bishop for Congress

25. In this review, the OCE found widespread mismanagement and misuse of the Sanford Bishop for Congress campaign committee funds. In some instances, Rep. Bishop may have misused funds himself for personal use and in other instances the misuse resulted from errors or intentional acts on the part of his former treasurer. Below is a brief description of the campaign committee’s structure and the manner in which Rep. Bishop oversaw the campaign committee’s activities.
26. Rep. Bishop was first elected to Congress in 1992. Beginning in 1993, Rep. Bishop hired Evelyn Turner Pugh to serve as treasurer of his principal campaign committee, Sanford Bishop for Congress.²⁰ In that role, Mrs. Pugh was tasked with managing incoming and outgoing monies and accounting for them on required FEC reports.²¹
27. In the fall of 2016, Current Treasurer was hired by the campaign committee as an assistant treasurer to Mrs. Pugh.²² Current Treasurer initially planned to shadow Mrs. Pugh for approximately four months, learn the role of treasurer, and then take over the role in January of 2017.²³ Current Treasurer believed she was brought on because Mrs. Pugh’s health was deteriorating and Rep. Bishop thought Mrs. Pugh needed help managing her campaign duties.²⁴
28. This transition did not occur as planned. Instead, Mrs. Pugh stayed on as treasurer until the fall of 2019.²⁵ Current Treasurer remained an assistant treasurer throughout this time period; however, she did not receive the training she anticipated.²⁶
29. As assistant treasurer, Current Treasurer primarily was responsible for collecting campaign contributions, depositing them in the campaign committee’s bank account, and then

¹⁹ *Id.* at 116.

²⁰ Transcript of Interview with Rep. Bishop (“Rep. Bishop Transcript”) (Exhibit 1 at 19-3824_0005).

²¹ *Id.* (Exhibit 1 at 19-3824_0006).

²² *Id.* (Exhibit 1 at 19-3824_0003); Transcript of Interview with Current Treasurer (“Current Treasurer Transcript”) (Exhibit 2 at 19-3824_0085).

²³ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0003); Current Treasurer Transcript (Exhibit 2 at 19-3824_0085).

²⁴ Current Treasurer Transcript (Exhibit 2 at 19-3824_00090; 0100-102).

²⁵ Rep. Bishop Response Re: E. Pugh and GICC (Exhibit 3 at 19-3824_0156-57); Current Treasurer Transcript (Exhibit 2 at 19-3824_0086-87); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0003).

²⁶ Current Treasurer Transcript (Exhibit 2 at 19-3824_0086; 0089-90); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0010-11).

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recording them in the campaign committee's FEC reporting software.²⁷ Current Treasurer had little visibility into how the campaign committee managed and reported disbursements and explained she spent a significant amount of time performing menial or administrative tasks at Mrs. Pugh's direction.²⁸ She also explained that Rep. Bishop had little substantive involvement with the preparation of FEC reports and trusted that Mrs. Pugh was appropriately managing this task.²⁹

30. The decision to have Current Treasurer assume the role of treasurer was precipitated by either the deteriorating health of Mrs. Pugh, Current Treasurer's reporting to Rep. Bishop that Mrs. Pugh was not appropriately performing her duties as treasurer, or some combination of the two.
31. According to Rep. Bishop, he was aware of Mrs. Pugh's health concerns as early as 2016.³⁰ He informed the OCE that Mrs. Pugh's health, as well as her telling him to find a new treasurer, were the reasons he hired Current Treasurer into the assistant treasurer role in 2016.³¹ However, he also told the OCE that he believed Mrs. Pugh was capable of continuing in the role, and she told him she was "fine" to do so.³²
32. According to Rep. Bishop, Mrs. Pugh's health "worsened precipitously" in early 2019 and she was "unable to function safely without constant aid and attendance, requiring her relocation to an assisted living facility. . . . Plans were made at that time to end her role as Treasurer."³³
33. Current Treasurer told the OCE that Mrs. Pugh's deteriorating health and its detrimental effect on her ability to perform her FEC reporting responsibilities were evident throughout her time with the campaign. For instance, Current Treasurer described Mrs. Pugh as falling asleep while preparing FEC reports.³⁴ She also explained that Mrs. Pugh had difficulty typing, and she would often wait until the day a report was due to try and consolidate months' worth of campaign spending.³⁵ In more recent months, Current Treasurer described Mrs. Pugh as suffering some memory loss.³⁶
34. When asked whether she reported any concerns about Mrs. Pugh to Rep. Bishop, she said she did not.³⁷ She told the OCE that she thought he was aware of these issues.³⁸

²⁷ Current Treasurer Transcript (Exhibit 2 at 19-3824_0089-90; 0103).

²⁸ *Id.* (Exhibit 2 at 19-3824_0086; 0089-90; 0103); *see also* Rep. Bishop Transcript (Exhibit 1 at 19-3824_0004; 0011).

²⁹ Current Treasurer Transcript (Exhibit 2 at 19-3824_0091; 0102).

³⁰ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0003; 0008). Specifically, he knew she had some physical dexterity limitations and he was also aware that she had a series of falls, surgeries, and hospitalizations in or around 2016. *Id.* (Exhibit 1 at 19-3824_0008); Rep. Bishop Response Re: E. Pugh and GICC (Exhibit 3 at 19-3824_0156-57).

³¹ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0003; 0008-09).

³² *Id.*

³³ Rep. Bishop Response Re: E. Pugh and GICC (Exhibit 3 at 19-3824_0156-57).

³⁴ Current Treasurer Transcript (Exhibit 2 at 19-3824_0100; 0102).

³⁵ *Id.* (Exhibit 2 at 19-3824_0086; 0088-89; 0100; 0116).

³⁶ *Id.* (Exhibit 2 at 19-3824_0102).

³⁷ *Id.* (Exhibit 2 at 19-3824_0100).

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35. In late August 2019 – during the time in which Mrs. Pugh’s health had “worsened precipitously” – Current Treasurer attended an FEC regional conference in Chicago, Illinois.³⁹ These conferences, held several times per year, include “a variety of technical workshops on the federal campaign finance laws affecting federal candidates” and are designed to assist individuals like Current Treasurer perform their FEC reporting responsibilities.⁴⁰
36. According to Current Treasurer, she had repeatedly asked Mrs. Pugh if she could attend one of these conferences, and Mrs. Pugh repeatedly told her it was unnecessary.⁴¹ Ms. Pugh ultimately relented, telling Current Treasurer to ask Rep. Bishop if she could attend.⁴² According to Current Treasurer, Rep. Bishop said “Please [go.] We need you to know as much as you can know.”⁴³
37. Current Treasurer described her time at the conference as follows: “my mouth was on the floor the whole time because I’m thinking, ‘We’re not doing that. We’re not doing that. We’re not doing-’ You know, I saw so much. I’m like, ‘Oh my God.’”⁴⁴
38. Current Treasurer’s main takeaway from the conference was that the campaign committee was not itemizing credit cards statements.⁴⁵ Indeed, the campaign routinely spent campaign funds on various credit cards but never listed the payment to the credit card company and then sub-itemized the payments to the various vendors.⁴⁶ Likewise, she raised concerns about the campaign committee’s failure to provide accurate purpose statements with respect to each campaign disbursement listed on FEC reports and failure to collect and review itemized receipts associated with campaign spending.⁴⁷
39. Current Treasurer went on to explain that she reported these concerns to Rep. Bishop after returning from the conference.⁴⁸ According to Current Treasurer:

³⁸ *Id.* (Exhibit 2 at 19-3824_0100-01).

³⁹ Rep. Bishop Response Re: E. Pugh and GICC (Exhibit 3 at 19-3824_0157); Current Treasurer Transcript (Exhibit 2 at 19-3824_0086).

⁴⁰ The Federal Election Commission, *FEC to host Chicago Regional Conference in August (2019)*, <https://www.fec.gov/updates/fec-chicago-regional-conference-august-2019/> (last visited Jan. 21, 2020).

⁴¹ Current Treasurer Transcript (Exhibit 2 at 19-3824_0086).

⁴² *Id.*

⁴³ *Id.*; *see also* Rep. Bishop Transcript (Exhibit 1 at 19-3824_0004).

⁴⁴ Current Treasurer Transcript (Exhibit 2 at 19-3824_0087).

⁴⁵ *Id.* (Exhibit 2 at 19-3824_0087-88; 0146). Current Treasurer told the OCE that Mrs. Pugh once told her that she was not properly itemizing the credit cards bills, but Current Treasurer said she didn’t understand the import of that statement until after returning from the FEC conference. *Id.* (Exhibit 2 at 19-3824_0146).

⁴⁶ *Id.* The campaign committee maintains credit cards with American Express and SunTrust Bank. Rep. Bishop Transcript (Exhibit 1 at 19-3824_0024; 0029); Current Treasurer Transcript (Exhibit 2 at 19-3824_0111-12). The OCE reviewed the campaign committee’s spending on these accounts in recent years. FEC reports contain no reference to monthly American Express or SunTrust credit card payments despite routinely paying credit card bills to both financial institutions. The only reference is to payment of annual fees.

⁴⁷ Current Treasurer Transcript (Exhibit 2 at 19-3824_0105-08; 0115).

⁴⁸ Rep. Bishop Response Re: E. Pugh and GICC (Exhibit 3 at 19-3824_0157); Current Treasurer Transcript (Exhibit 2 at 19-3824_0087; 0108); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0004).

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I showed him all the things that [the FEC] said we should be doing. And he said, “We’re not doing that?” He was clueless and he was floored. And he was like, “Okay, I need your name on the documentation as treasurer. I need you to take over immediately.”⁴⁹

40. Current Treasurer was promoted to treasurer just after returning from the FEC conference and reporting her concerns to Rep. Bishop.⁵⁰ She was first listed as treasurer in a September 9, 2019 FEC Statement of Organization.⁵¹
41. Rep. Bishop admitted to the OCE that he provided minimal oversight to Mrs. Pugh during the last several years given her decades of experience in the role.⁵² While he inquired about whether the filings would be timely and offered to help as needed, he was not substantively involved in preparing the reports or managing the various bank accounts.⁵³
42. Shortly after Current Treasurer was promoted to treasurer, the OCE began its review.⁵⁴ As a part of the review, the OCE sent Rep. Bishop a Request for Information (RFI) that sought documents from both him and his campaign committee.⁵⁵ Rep. Bishop and Current Treasurer sought to comply with that RFI by identifying, collecting, and turning over documents to the OCE. While they were able to locate and provide certain responsive documents to the OCE, both Rep. Bishop and Current Treasurer explained that Mrs. Pugh had neglected to appropriately collect and store various types of campaign records, making the production of requested materials challenging.⁵⁶
43. Current Treasurer’s attendance at the FEC conference and the OCE’s RFI required Rep. Bishop and Current Treasurer to examine the manner in which the Sanford Bishop for Congress campaign committee had been both spending funds and reporting those expenditures in publicly available FEC reports. As discussed more fully below, this review yielded evidence of recurring personal use of campaign funds by Rep. Bishop and his family, intentional misreporting of various campaign expenditures on required FEC reports, and indications that the campaign committee’s long-time treasurer had converted campaign funds to personal use.

⁴⁹ Current Treasurer Transcript (Exhibit 2 at 19-3824_0087).

⁵⁰ Rep. Bishop Response Re: E. Pugh and GICC (Exhibit 3 at 19-3824_0157); Current Treasurer Transcript (Exhibit 2 at 19-3824_0086-87; 0108).

⁵¹ See Sanford Bishop for Congress, FEC Form 1 Statement of Organization, Amendment, filed September 9, 2019 at 1.

⁵² Rep. Bishop Transcript (Exhibit 1 at 19-3824_0009; 0012).

⁵³ *Id.* (Exhibit 1 at 19-3824_0008-09; 0012); see also Current Treasurer Transcript (Exhibit 2 at 19-3824_0091; 0102; 0117).

⁵⁴ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0010).

⁵⁵ Request for Information from Omar S. Ashmawy, Chief Counsel and Staff Dir., Office of Cong. Ethics, to Rep. Sanford Bishop, Jr. September 16, 2019.

⁵⁶ See e.g., Current Treasurer Transcript (Exhibit 2 at 19-3824_0105-06); Rep. Bishop Response Re: Multiple Gas Disbursements (Exhibit 4 at 19-3824_0162).

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C. Vehicle-Related Personal Use

44. During the course of this review, the OCE requested information from Rep. Bishop and his campaign committee about fuel-related campaign disbursements. Rep. Bishop and Current Treasurer conferred with Mrs. Pugh in an attempt to respond to this request.⁵⁷ Through this process, Rep. Bishop determined and explained to the OCE that Mrs. Pugh was intentionally misreporting certain campaign expenditures and she may have converted funds from the Sanford Bishop for Congress campaign account to personal use. Additionally, the OCE determined that the manner in which Rep. Bishop’s campaign committee was paying for fuel may have resulted in the personal use of campaign funds by Rep. Bishop, his wife, and his daughter.

i. Misreporting and Conversion

45. The OCE sought information from the campaign committee about the following fuel-related campaign disbursements:⁵⁸

Date	Recipient Name	Disbursement Description	Amount
6/10/19	Exxon	Gas	\$820.05
5/10/19	Exxon	Gas	\$1,111.58
4/10/19	Circle K	Gas	\$345.13
4/10/19	BP Oil	Gas	\$327.07
3/13/19	Walmart Supercenter	Gas	\$281.60
2/6/19	Citgo	Gas	\$403.03
12/20/18	BP Oil	Gas	\$337.80
12/17/18	Michael Brown	Gas	\$1,976.00
12/11/18	Walmart Supercenter	Gas	\$402.41
12/11/18	Raceway	Gas	\$505.92
11/3/18	BP Oil	Gas	\$623.58
10/11/18	Walmart of Albany	Gas	\$914.18
4/13/18	Raceway	Gas	\$574.93
4/11/18	Shell Oil	Gas	\$437.25
11/20/17	BP Oil	Gas	\$496.29
11/15/17	Crown Gas	Gas	\$266.05
10/10/17	Citgo	Gas	\$227.10

46. Initially, Rep. Bishop was able to explain that two of the charges to Exxon – from June 10, 2019 and May 10, 2019 – were not actually for gas but instead were for repairs to his car and

⁵⁷ See e.g., Rep. Bishop Response Re: Multiple Gas Disbursements (Exhibit 4 at 19-3824_0162).

⁵⁸ Letter from Omar S. Ashmawy, Chief Counsel and Staff Dir., Office of Cong. Ethics, to Rep. Sanford Bishop, Jr., October 15, 2019. The list of disbursements was compiled from various FEC Reports of Receipts and Disbursements filed between 2017 and 2019. The OCE notes that its RFI only sought documentation on a select sample of more recent fuel disbursements.

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended for a meal at a Washington, D.C.-based restaurant.⁵⁹ With respect to the remainder of the identified disbursements, Rep. Bishop told the OCE the following:

As indicated [previously, Mrs. Pugh] was diagnosed with [health conditions] which ha[ve] become progressively worse in the past 4 or 5 years and has precipitously worsened over the last 8 months, resulting in her relocation to an assisted living facility. After exhaustive search of campaign committee records and other possible sources of information and data that were kept by Mrs. Pugh, we have been unable to find records of campaign committee disbursement [sic] that correspond with the items requested. . . . It is believed that due to her declining manual dexterity and related impairments from her medical conditions, Mrs. Pugh sought ways to limit the number of items that would have to be inputted into [FEC reporting software] and included on the disclosure reports. Rather than list each individual disbursement, it now appears that she combined or lumped together multiple small fuel charges without connecting them to specific dates and arbitrarily assigning the vendor names to ones that were already populated in [the FEC reporting software]. This arbitrary short cut, under pressure of filing deadlines, may have provided a way to expedite preparation of disclosure reports without researching and inputting each individual vendor name, address, date of transaction, etc. This is a theory because we have no earthly idea how the amounts and attributions were arrived at or when and where the charges were incurred. Listing the disbursements as described in these requests without the necessary verification and documentation is inconsistent with applicable FEC guidelines. . . . Needless to say, going forward the guidelines will be strictly adhered to.⁶⁰

47. Later, both Rep. Bishop and Current Treasurer told the OCE that they believed that Mrs. Pugh was not simply combining multiple gas charges as initially suspected; instead, in an effort to minimize the number of items she would have to enter into the FEC reporting software, she would combine a variety of different charges (gas or otherwise) into one large disbursement and label it “gas” when in fact it was a combination of several different disbursements (*e.g.*, food, supplies, etc.).⁶¹ She was doing this in order to “quickly get through [a] filing,” preparing “as minimal disbursements as possible.”⁶² Accordingly, the OCE determined that the accuracy and reliability of the Sanford Bishop for Congress FEC reports is in question dating back to at least 2017, but likely much further.⁶³

⁵⁹ Rep. Bishop Response Re: Exxon 6.10.19 Disbursement (Exhibit 5 at 19-3824_0164); Repair Bill 6.10.19 Disbursement (Exhibit 6 at 19-3824_0167); Amex Bill 6.10.19 Disbursement (Exhibit 7 at 19-3824_0172); Rep. Bishop Response Re: Exxon 5.10.19 Disbursement (Exhibit 8 at 19-3824_0177); Repair Bill 5.10.19 Disbursement (Exhibit 9 at 19-3824_0180); Amex Bill 5.10.19 Disbursement (Exhibit 10 at 19-3824_0184).

⁶⁰ Rep. Bishop Response Re: Multiple Gas Disbursements (Exhibit 4 at 19-3824_0162). As discussed below, Rep. Bishop would later produce additional documentation regarding some of the charges identified.

⁶¹ Current Treasurer Transcript (Exhibit 2 at 19-3824_0145-47); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0011; 0076).

⁶² Current Treasurer Transcript (Exhibit 2 at 19-3824_0147).

⁶³ This is especially true given the variety of other FEC reporting violations that the OCE identified throughout the course of this review. *See supra* Section II.B (discussing Mrs. Pugh’s failure to properly itemize credit card

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48. While reviewing records in response to the OCE's request identified above, Rep. Bishop also determined that Mrs. Pugh may have converted campaign funds to her personal use. Specifically, Rep. Bishop and Current Treasurer told the OCE that two of the disbursements identified above – the November 20, 2017 disbursement to BP Oil for \$496.29 and the December 17, 2018 disbursement to Michael Brown for \$1,976.00 – were actually checks written to Mrs. Pugh and deposited into her personal bank account.⁶⁴
49. Rep. Bishop and Current Treasurer confronted Mrs. Pugh about these two checks shortly after their discovery of the conversion.⁶⁵ She had no recollection of why she would have written them to herself and reported them as disbursements to others.⁶⁶ Rep. Bishop said these deposits could have been “mistakes” or a “result of memory lapses,” and expressed both frustration and anger concerning her inability to explain herself.⁶⁷ Mrs. Pugh was asked to and did reimburse the campaign committee for the amount of both checks.⁶⁸

ii. Failure to Log Mileage

50. In addition to the evidence that Mrs. Pugh converted campaign funds and falsified FEC records, the OCE also determined that Rep. Bishop, his wife, and his daughter may have used campaign funds to pay for personal fuel charges. Under FEC regulations, vehicle expenses that would exist irrespective of a candidate's campaign duties are personal use, unless they can be considered *de minimis*.⁶⁹ While neither the House nor FEC mandate the specific manner in which mileage is tracked, the rules contemplate that parties will be able to determine what miles are driven for what purposes.⁷⁰
51. Rep. Bishop does not keep a mileage log of any kind, and therefore he cannot determine what miles were traveled for campaign, personal, or official purposes.⁷¹ The fuel he consumes (at

statements and include accurate disbursement descriptions); *see infra* Section II.D.i-ii (discussing how disbursements to certain country clubs were misleading); *see infra* Section II.D.iii (discussing how three rounds of golf were erroneously identified as “lodging” expenses). During Rep. Bishop's interview he also identified over a dozen disbursements to a campaign staff member that were improperly designated as “catering” and “security” disbursements. Rep. Bishop Transcript (Exhibit 1 at 19-3824_0078-79; 0082). Rep. Bishop told the OCE that the staffer never performed security or catering services on behalf of the campaign. *Id.*

⁶⁴ Rep. Bishop Response Re: BP Oil 11.20.17 Disbursement (Exhibit 11 at 19-3824_0187-88); \$496.29 Sanford Bishop for Congress Check to E. Pugh (Exhibit 12 at 19-3824_0190); Rep. Bishop Response Re: Mike Brown Disbursement (Exhibit 13 at 19-3824_0192-93); \$1,976.00 Sanford Bishop for Congress Check to E. Pugh (Exhibit 14 at 19-3824_0196); Current Treasurer Transcript (Exhibit 2 at 19-3824_0148-50); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0006-7).

⁶⁵ Rep. Bishop Response Re: BP Oil 11.20.17 Disbursement (Exhibit 11 at 19-3824_0187); Rep. Bishop Response Re: Mike Brown Disbursement (Exhibit 13 at 19-3824_0193); Current Treasurer Transcript (Exhibit 2 at 19-3824_0149-50); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0007).

⁶⁶ Current Treasurer Transcript (Exhibit 2 at 19-3824_0149-50); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0007; 0015); Rep. Bishop Response Re: BP Oil 11.20.17 Disbursement (Exhibit 11 at 19-3824_0187); Rep. Bishop Response Re: Mike Brown Disbursement (Exhibit 13 at 19-3824_0192-93).

⁶⁷ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0006; 0015-16).

⁶⁸ Current Treasurer Transcript (Exhibit 2 at 19-3824_0150); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0007); Rep. Bishop Response Re: BP Oil 11.20.17 Disbursement (Exhibit 11 at 19-3824_0187); Rep. Bishop Response Re: Mike Brown Disbursement (Exhibit 13 at 19-3824_0192-93).

⁶⁹ *See supra*, Section II.A.

⁷⁰ *Id.*

⁷¹ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0027).

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least in recent years) is paid for with campaign funds.⁷² Rep. Bishop believes he does very little travel that is “strictly personal.”⁷³ He told the OCE he is engaged in political discussions wherever he travels, meaning that in his view, a trip to the grocery store, Walmart, golf course, or other venue that may appear personal on its face, almost always entails some political component.⁷⁴

52. Rep. Bishop also told the OCE that his wife does not log her campaign mileage.⁷⁵ Mrs. Bishop maintains a full-time job as the elected Clerk of the Municipal Court in Columbus, Georgia,⁷⁶ and while she does not have an official title with the campaign, Rep. Bishop informed the OCE that she does a significant amount of driving in support of his reelection efforts.⁷⁷
53. The OCE found evidence that Mrs. Bishop would routinely fill her vehicle with fuel using campaign funds. For example, Mrs. Bishop had access to a campaign American Express card and would routinely purchase fuel for her vehicle on that card.⁷⁸
54. Rep. Bishop also had personal gas credit cards on which Mrs. Bishop was an additional cardholder, and he would have these bills paid by the campaign committee.⁷⁹ For example, in response to the RFI discussed above, Rep. Bishop produced a Citgo Rewards Gas Credit Card Statement to the OCE.⁸⁰ The \$227.10 payment to Citgo corresponded to the October 10, 2017 \$227.10 disbursement identified in the chart above. In his response, Rep. Bishop noted that all the Citgo gas charges were made on “Card 02,” which was his wife’s card.⁸¹ Rep. Bishop further explained that his wife frequently uses her personal vehicle to perform work on behalf of the campaign committee, and while he could not be sure which campaign activities these fuel purchases were related to, he “believed” them to be “in furtherance of legitimate [campaign activities].”⁸²
55. Rep. Bishop acknowledged that his and his wife’s failure to log or document their mileage was problematic and prevented them (and others) from determining what fuel charges were

⁷² *Id.* (Exhibit 1 at 19-3824_0027-28; 0074); Rep. Bishop Response Re: Multiple Gas Disbursements (Exhibit 4 at 19-3824_0161-62).

⁷³ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0026-28); Rep. Bishop Response Re: Multiple Gas Disbursements (Exhibit 4 at 19-3824_0161-62).

⁷⁴ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0026-28); Rep. Bishop Response Re: Multiple Gas Disbursements (Exhibit 4 at 19-3824_0161-62).

⁷⁵ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0075).

⁷⁶ Columbus, Georgia Judicial System, *Municipal Court Clerk Vivian Creighton-Bishop*, <https://www.columbusga.gov/Courts/munClerk.htm> (last visited Jan. 21, 2020); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0022).

⁷⁷ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0018-19; 0021-22); Rep. Bishop Response Re: Citgo Oil 10.10.17 Disbursement (Exhibit 15 at 19-3824_0198).

⁷⁸ Sample American Express Fuel Purchases by Mrs. Bishop (Exhibit 16 at 19-3824_0201-72).

⁷⁹ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0025-26); Rep. Bishop Response Re: Citgo Oil 10.10.17 Disbursement (Exhibit 15 at 19-3824_0198).

⁸⁰ Rep. Bishop Response Re: Citgo Oil 10.10.17 Disbursement (Exhibit 15 at 19-3824_0198); Sanford Bishop for Congress 10/12/17 Citgo Rewards Statement (Exhibit 17 at 19-3824_0274-75).

⁸¹ Rep. Bishop Response Re: Citgo Oil 10.10.17 Disbursement (Exhibit 15 at 19-3824_0198).

⁸² *Id.*

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properly billed to the campaign.⁸³ The OCE also notes that personal use issues are likely to arise when the spouse of a congressperson charges gas to a personal card and then the congressperson seeks reimbursement for all the charges to that card. This is especially so where – as in the present case – the treasurer does not appear to be taking an active role in screening bills for potential personal charges.

56. In addition to the potentially problematic fuel consumption addressed above, Rep. Bishop also acknowledged that campaign funds were possibly used to pay for his daughter’s personal fuel consumption.⁸⁴ Rep. Bishop said he may have permitted his daughter to charge personal gas expenses onto his personal gas credit card and then later had that bill paid with campaign funds.⁸⁵

D. Golf-Related Personal Use

57. Rep. Bishop is an avid golfer and repeatedly stated that his time on the golf course benefited his reelection efforts.⁸⁶ He has been a member at Stonebridge Golf and Country Club (SGCC) since 1999 and a member of the Green Island Country Club (GICC) since 2014. While Rep. Bishop believes that his time on the golf course has assisted his campaigns for reelection, he also acknowledged that some of his golf-related campaign spending constituted personal use.

58. Below the OCE addresses campaign committee payments Rep. Bishop made to SGCC and GICC, and also addresses other golf-related expenditures that may run afoul of personal use prohibitions.

i. **Stonebridge Golf & Country Club**

59. SGCC is a private country club located in Albany, Georgia. SGCC offers its members a variety of amenities, including golf, tennis, dining, exercise, and pool facilities.⁸⁷ SGCC’s promotional materials state that “Exceptional Golf and Community is the essence of [SGCC].”⁸⁸

⁸³ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0075); Rep. Bishop Response Re: Citgo Oil 10.10.17 Disbursement (Exhibit 15 at 19-3824_0198-99); Rep. Bishop Response Re: Multiple Gas Disbursements (Exhibit 4 at 19-3824_0162).

⁸⁴ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0074-75).

⁸⁵ *Id.*

⁸⁶ *See e.g.*, Rep. Bishop Response Re: E. Pugh and GICC (Exhibit 3 at 19-3824_0157); Rep. Bishop Response Re: SGCC (Exhibit 18 at 19-3824_0277-78); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0012).

⁸⁷ Stonebridge Golf and Country Club, *Homepage*, <http://www.stonebridgegcc.com/index.php> (last visited Jan. 21, 2020); Stonebridge Golf and Country Club, *Club Features*, <http://www.stonebridgegcc.com/index.php> (last visited Jan. 21, 2020).

⁸⁸ Stonebridge Golf and Country Club, *Homepage*, <http://www.stonebridgegcc.com/index.php> (last visited Jan. 21, 2020).

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60. Rep. Bishop joined SGCC in October 1999 and maintains a full-privilege membership at the club.⁸⁹ Rep. Bishop's membership gives both him and his wife full access to the club's amenities.⁹⁰
61. The OCE determined that Rep. Bishop primarily uses the club for its golf and dining facilities; however, his usage has been infrequent in recent years.⁹¹ Rep. Bishop held an annual golf fundraiser – the Sanford Bishop Golf Classic (Golf Classic) – at SGCC from approximately 1998 through 2012.⁹²
62. Rep. Bishop receives monthly billing statements from SGCC.⁹³ These statements include charges for monthly membership dues and associated fees, including driving range fees, locker fees, and unmet food and beverage minimums.⁹⁴ The statements also include other charges he incurs in a given month that are not covered by his membership dues. For example, he incurred charges for meals, guest greens fees, golf carts usage, golf merchandise, and charges associated with his annual Golf Classic.⁹⁵ Rep. Bishop's campaign committee paid the SGCC monthly billing statements in their entirety.⁹⁶
63. Rep. Bishop acknowledged it “was a mistake” for the campaign committee to pay the SGCC monthly membership dues and associated fees.⁹⁷ The OCE reviewed Rep. Bishop's SGCC monthly billing statements from January 2009 to September 2019 and determined that the campaign committee paid \$30,177.39 to the club for monthly membership dues, range fees, locker fees, and unmet food and beverage minimums during this timeframe.⁹⁸ Rep. Bishop is

⁸⁹ SGCC Membership Application (Exhibit 19 at 19-3824_0280-81); SGCC Monthly Statements (Exhibit 20 at 19-3824_0283-425).

⁹⁰ SGCC Membership Application (Exhibit 19 at 19-3824_0280-81). Rep. Bishop was unmarried when he joined this club in 1999, but his privileges extended to his wife following their marriage. *See* Transcript of Interview with SGCC Golf Pro (“SGCC Golf Pro Transcript”) (Exhibit 21 at 19-3824_0436-37).

⁹¹ SGCC Monthly Statements (Exhibit 20 at 19-3824_0283-425).

⁹² Rep. Bishop Response Re: E. Pugh and GICC (Exhibit 3 at 19-3824_0157); Rep. Bishop Response Re: SGCC (Exhibit 18 at 19-3824_0277-78).

⁹³ SGCC Monthly Statements (Exhibit 20 at 19-3824_0283-425).

⁹⁴ *Id.*

⁹⁵ *Id.*

⁹⁶ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0030-31); Current Treasurer Transcript (Exhibit 2 at 19-3824_0126-27); Rep. Bishop Response Re: SGCC (Exhibit 18 at 19-3824_0277-78).

⁹⁷ Rep. Bishop Response Re: SGCC (Exhibit 18 at 19-3824_0278); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0032).

⁹⁸ SGCC Monthly Statements (Exhibit 20 at 19-3824_0283-420); SGCC Campaign Payment Exhibit (Exhibit 22 at 19-3824_0442-43); SGCC Campaign Checks (Exhibit 23 at 19-3824_0445-60). The OCE confirmed that between January 2013 and September 2019, the campaign committee paid \$19,402.62 to the club for these charges. SGCC Monthly Statements (Exhibit 20 at 19-3824_0283-420); SGCC Campaign Payment Exhibit (Exhibit 22 at 19-3824_0442-43); SGCC Campaign Checks (Exhibit 23 at 19-3824_0445-60). The OCE understands, given Rep. Bishop's statements, that all payments to the club for membership dues, range fees, locker fees, and food and beverage minimums from 1999 to September 2019 were paid with campaign committee funds; however, given the documents collected, the OCE could only calculate the amount of payments made from 2009 forward and could only corroborate with additional documentation that the payments from 2013-2019 were in fact paid by the campaign committee.

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no longer paying monthly membership fees with campaign funds having acknowledged the impropriety of doing so.⁹⁹

64. In addition to these monthly membership dues, Rep. Bishop's campaign committee also paid for meals, guest greens fees, golf cart fees, and golf merchandise.¹⁰⁰ In total, between January 2009 and September 2019, the campaign committee spent \$6,853.58 on these additional charges, which excludes costs associated with the annual Golf Classic.¹⁰¹
65. The OCE could not determine to what extent these additional, non-Golf Classic charges were in furtherance of bona fide campaign or political purposes. First, the OCE notes that Rep. Bishop did not keep records concerning who he dined or golfed with and the campaign purpose of such outings.¹⁰²
66. Additionally, Rep. Bishop's descriptions of the manner in which he used the golf club raised personal use concerns. Specifically, Rep. Bishop said he views his time at the club as campaign-related because it affords him the opportunity to "run into" supporters and constituents and then discuss political issues over a round of golf or a meal.¹⁰³ In other words, Rep. Bishop is not holding specific fundraising events at the club; instead, he is using the club's facilities, at least on some occasions, by himself or with his wife, and then interacting with supporters and constituents that seek him out during a round of golf or at a Sunday brunch.¹⁰⁴
67. The OCE also notes SGCC disbursement descriptions provided to the FEC were often misleading. The campaign committee generally described charges to SGCC for meals and golf outings as "fundraising" expenses on the campaign committee's FEC reports; however, Rep. Bishop told the OCE that he has not held a fundraiser at the club in recent years.¹⁰⁵ Moreover, the dues statements indicate that the payments were most often for monthly

⁹⁹ Rep. Bishop Response Re: E. Pugh and GICC (Exhibit 3 at 19-3824_0157); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0032).

¹⁰⁰ SGCC Monthly Statements (Exhibit 20 at 19-3824_0283-420); SGCC Campaign Payment Exhibit (Exhibit 22 at 19-3824_0442-43); SGCC Campaign Checks (Exhibit 23 at 19-3824_0445-60); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0030-31).

¹⁰¹ SGCC Monthly Statements (Exhibit 20 at 19-3824_0283-420); SGCC Campaign Payment Exhibit (Exhibit 22 at 19-3824_0442-43); SGCC Campaign Checks (Exhibit 23 at 19-3824_0445-60). As discussed above, Rep. Bishop stated that the campaign committee paid the monthly SGCC billing statements in their entirety; however, the OCE could only corroborate campaign committee payments between 2013 and 2019. *See supra*, note 98. To arrive at the \$6,853.58 figure, the OCE added all spending on dining, golf, and merchandise identified in the SGCC monthly billing statements – excluding any spending that appeared to be in furtherance of the Golf Classic – between January 2009 and September 2019. Between January 2013 and September 2019, the campaign committee spent \$3,776.50.

¹⁰² Rep. Bishop Transcript (Exhibit 1 at 19-3824_0036). SGCC Golf Pro said he saw Rep. Bishop on the golf course with just his wife. SGCC Golf Pro Transcript (Exhibit 21 at 19-3824_0434).

¹⁰³ Rep. Bishop Response Re: SGCC (Exhibit 18 at 19-3824_0277-78); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0033-36).

¹⁰⁴ Rep. Bishop Response Re: SGCC (Exhibit 18 at 19-3824_0277-78); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0033-36).

¹⁰⁵ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0034).

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membership dues and associated fees.¹⁰⁶ Current Treasurer acknowledged that the FEC disbursement descriptions were inaccurate.¹⁰⁷

ii. Green Island Country Club

68. GICC is a private country club located in Columbus, Georgia. GICC describes itself as “Columbus’ pinnacle combination of activity, fitness, and social amenities. The Club boasts eighteen holes of meticulously manicured golf course, eight rubico tennis courts, adult and junior golf and tennis leagues with year round clinics, training and fitness center, gourmet and casual dining, and beautifully appointed rooms for business or entertaining groups of any size.”¹⁰⁸
69. Rep. Bishop joined GICC because several of his supporters were in a legal dispute with the owner of SGCC, and they would not participate in his annual Golf Classic if he continued to hold it at SGCC.¹⁰⁹ Rep. Bishop moved his annual golf fundraiser from SGCC to GICC in 2013¹¹⁰ and then officially joined GICC as a member in May 2014.¹¹¹
70. In order to join the club, Rep. Bishop was required to pay a \$5,000.00 initiation fee. Rep. Bishop’s campaign committee paid that initiation fee via check on or about May 13, 2014.¹¹²
71. Rep. Bishop maintains a membership which provides him and his wife full access to all the club’s amenities.¹¹³ The OCE determined that Rep. Bishop primarily uses the club for its golf, dining, and banquet facilities.¹¹⁴
72. Like SGCC, Rep. Bishop receives monthly billing statements from GICC.¹¹⁵ These billing statements include monthly membership charges and fees as well as other charges that he incurs during a given month, such as charges for meals, guest greens fees, golf cart fees, golf merchandise, and banquets.¹¹⁶ These fees were automatically debited from the Sanford Bishop for Congress campaign bank account as of April 2015 and paid via campaign check before that date.¹¹⁷

¹⁰⁶ SGCC Monthly Statements (Exhibit 20 at 19-3824_0283-420).

¹⁰⁷ Current Treasurer Transcript (Exhibit 2 at 19-3824_0127).

¹⁰⁸ GICC Membership Brochure (Exhibit 24 at 19-3824_0462-63).

¹⁰⁹ Rep. Bishop Response Re: SGCC (Exhibit 18 at 19-3824_0277-78).

¹¹⁰ *Id.*; Rep. Bishop Response Re: E. Pugh and GICC (Exhibit 3 at 19-3824_0157).

¹¹¹ GICC Membership Application (Exhibit 25 at 19-3824_0465-66).

¹¹² *Id.*; GICC Initiation Fee Check (Exhibit 26 at 19-3824_0468); Sanford Bishop for Congress, FEC Quarterly Report of Receipts and Disbursements (Q2), filed July 13, 2014 at 40.

¹¹³ Transcript of Interview with GICC Controller (“GICC Controller Transcript”) (Exhibit 27 at 19-3824_0476-77); GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0492-612); GICC Membership Brochure (Exhibit 24 at 19-3824_0463).

¹¹⁴ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0492-612).

¹¹⁵ *Id.*

¹¹⁶ *Id.*

¹¹⁷ *Id.*; GICC Campaign Payment Exhibit (Exhibit 29 at 19-3824_0615-20); GICC Campaign Checks (Exhibit 30 at 19-3824_0622-30); GICC ACH Form (Exhibit 31 at 19-3824_0632). Beginning in April 2015, the campaign committee automatically paid monthly GICC billing statements through an electronic debit. GICC Campaign Payment Exhibit (Exhibit 29 at 19-3824_0615-20); GICC ACH Form (Exhibit 31 at 19-3824_0632). Prior to that date, the campaign committee paid the monthly statements via check. GICC Campaign Payment Exhibit (Exhibit 29

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73. Specifically, Rep. Bishop paid monthly dues,¹¹⁸ a monthly service charge,¹¹⁹ locker fees,¹²⁰ handicap fees,¹²¹ employee holiday fund fees,¹²² and an annual assessment.¹²³ Between May 2014 and September 2019, Rep. Bishop's campaign committee paid \$33,338.00 to cover these monthly dues and associated fees.¹²⁴ Rep. Bishop told the OCE it "was a mistake" for the campaign committee to pay these membership costs, and he has discontinued the campaign's monthly automatic debit payments to GICC.¹²⁵
74. In addition to these monthly membership dues, Rep. Bishop's campaign committee also paid for various other charges that he incurred in a given month at GICC (and that were not included in his monthly dues payments), including meals, greens fees, golf cart fees, golf merchandise, and banquets.¹²⁶ In total, between May 2014 and September 2019, the campaign committee spent \$16,226.08 on these charges (excluding costs associated with the Golf Classic).¹²⁷
75. The OCE could not determine to what extent these additional, non-Golf Classic charges were in furtherance of bona fide campaign or political purposes. First, the OCE notes that Rep. Bishop did not keep records concerning who he dined or golfed with and the campaign

at 19-3824_0615-20); GICC Campaign Checks (Exhibit 30 at 19-3824_0622-30). Rep. Bishop and others explained to the OCE that not all charges on the monthly statements were paid by the campaign committee. Rep. Bishop and his wife would allow friends to host banquets under their membership. While charges for these events would appear on the GICC monthly statements, the events were paid by separate check (and thus not ultimately paid using campaign funds). GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0492-612); GICC Campaign Payment Exhibit (Exhibit 29 at 19-3824_0615-20); Rep. Bishop Response Re: E. Pugh and GICC (Exhibit 3 at 19-3824_0156-57); Emails Re: GICC Banquet Payments (Exhibit 32 at 19-3824_0634); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0036-37); GICC Controller Transcript (Exhibit 27 at 19-3824_0484-85); Current Treasurer Transcript (Exhibit 2 at 19-3824_0119).

¹¹⁸ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0492-612); GICC Controller Transcript (Exhibit 27 at 19-3824_0477).

¹¹⁹ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0492-612); GICC Controller Transcript (Exhibit 27 at 19-3824_0479). This fee is charged in lieu of having members tip at each meal. *Id.*

¹²⁰ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0492-612); GICC Controller Transcript (Exhibit 27 at 19-3824_0480). This fee is for access to a personal locker in the locker room of the club. *Id.*

¹²¹ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0492-612); GICC Controller Transcript (Exhibit 27 at 19-3824_0481). This fee permits members to establish a golf handicap. *Id.*

¹²² GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0492-612); GICC Controller Transcript (Exhibit 27 at 19-3824_0482). This fee funds the GICC staff's holiday bonus payments. *Id.*

¹²³ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0492-612); GICC Controller Transcript (Exhibit 27 at 19-3824_0480). This is a fee billed twice a year to maintain and improve the club's grounds and facilities. *Id.*

¹²⁴ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0492-612); GICC Campaign Payment Exhibit (Exhibit 29 at 19-3824_0615-20); GICC Campaign Checks (Exhibit 30 at 19-3824_0622-30); GICC ACH Form (Exhibit 31 at 19-3824_0632).

¹²⁵ Rep. Bishop Response Re: E. Pugh and GICC (Exhibit 3 at 19-3824_0157); *see also* GICC Controller Transcript (Exhibit 27 at 19-3824_0485).

¹²⁶ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0492-612); GICC Campaign Payment Exhibit (Exhibit 29 at 19-3824_0615-20); GICC Campaign Checks (Exhibit 30 at 19-3824_0622-30); GICC ACH Form (Exhibit 31 at 19-3824_0632).

¹²⁷ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0492-612); GICC Campaign Payment Exhibit (Exhibit 29 at 19-3824_0615-20); GICC Campaign Checks (Exhibit 30 at 19-3824_0622-30); GICC ACH Form (Exhibit 31 at 19-3824_0632). To arrive at the \$16,226.08 figure, the OCE added all spending on dining, golf, merchandise, and banquets identified in the GICC monthly billing statements – excluding any spending that appeared to be in furtherance of the Golf Classic. This figure does not include the \$5,000 initiation fee.

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purpose of such outings.¹²⁸ Rep. Bishop also had difficulty remembering the specific purpose of certain banquets paid for by the campaign committee.¹²⁹

76. Second, Rep. Bishop's descriptions of the manner in which he used the golf club raised personal use concerns. Like SGCC, Rep. Bishop joined GICC and maintained a membership because it gave him access to a broad segment of his constituents, supporters, and prospective supporters that he could run into and interact with during a meal or golf.¹³⁰ Rep. Bishop acknowledged going to GICC by himself or with constituents but said he most frequently attends with his wife.¹³¹
77. Third, the OCE identified several campaign expenditures that could be personal in nature. For instance, GICC monthly billing statements show the campaign committee paid for children's meals, presumably for Rep. Bishop's granddaughter.¹³² Additionally, the campaign committee paid for Mother's Day brunches held at the club in 2015, 2016, 2017 and 2019.¹³³ When asked about these brunches, Rep. Bishop acknowledged that he would have attended these events with his family, but also suggested that he may have invited constituents to join.¹³⁴ He emphasized that it was a popular event at the club and he would "run into everybody."¹³⁵
78. Finally, the OCE identified various expenditures that were paid for with campaign funds, but that Rep. Bishop acknowledged to be personal in nature. This includes the purchase of a \$95.23 pair of golf shoes,¹³⁶ \$81.00 golf grips for his personal golf clubs,¹³⁷ and a \$21.20 golf glove.¹³⁸
79. The campaign committee also paid for a \$938.07 set of Mizuno JPX irons, and Rep. Bishop was subsequently fitted for these irons during a \$50.00, one-hour-plus fitting session with the GICC Golf Pro.¹³⁹ When asked why personal golf clubs and a fitting were charged to the

¹²⁸ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0038). GICC Golf Pro told the OCE that he sees Rep. Bishop golfing alone and dining with what appeared to be family. Transcript of Interview with GICC Golf Pro ("GICC Golf Pro Transcript") (Exhibit 33 at 19-3824_0641-42). GICC Banquet Coordinator said she saw Rep. Bishop and his wife dining together and also saw Mrs. Bishop dining without Rep. Bishop. Transcript of Interview with GICC Banquet Coordinator ("GICC Banquet Coordinator Transcript") (Exhibit 34 at 19-3824_0664-65).

¹²⁹ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0045-46).

¹³⁰ Rep. Bishop Response Re: E. Pugh and GICC (Exhibit 3 at 19-3824_0157); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0038; 0047); Current Treasurer Transcript (Exhibit 2 at 19-3824_0123).

¹³¹ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0038).

¹³² GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0501; 0512; 0587; 0591).

¹³³ *Id.* (Exhibit 28 at 19-3824_0590-91; 0568-69; 0544-45; 0500-01).

¹³⁴ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0046-47).

¹³⁵ *Id.* (Exhibit 1 at 19-3824_0047).

¹³⁶ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0588-89); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0050); GICC Golf Pro Transcript (Exhibit 33 at 19-3824_0653).

¹³⁷ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0552-53); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0049); GICC Golf Pro Transcript (Exhibit 33 at 19-3824_0650).

¹³⁸ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0608-09); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0050); GICC Golf Pro Transcript (Exhibit 33 at 19-3824_0655).

¹³⁹ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0546-47); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0048); GICC Golf Pro Transcript (Exhibit 3 at 19-3824_0649).

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campaign, Rep. Bishop said he originally intended to purchase the irons personally, but later opted to raffle them off at his annual golf fundraiser.¹⁴⁰

80. The OCE also notes GICC disbursement descriptions provided to the FEC were often misleading. For example, disbursements to GICC would be described as “fundraising” expenses when in fact they were simply payments for reoccurring club dues and fees.¹⁴¹ Or the disbursement would be identified as a meal when in fact the majority of the payment was for monthly membership costs.¹⁴² Current Treasurer acknowledged the misleading nature of these disbursement descriptions in her interview with the OCE.¹⁴³

iii. Reynolds Plantation Trip

81. In addition to the spending at both SGCC and GICC, Rep. Bishop also spent campaign funds on a 3-day golf trip in April 2018. The spending on this trip implicates personal use prohibitions.
82. From April 4-7, 2018, Rep. Bishop held what he described as a “planning retreat” with “three principal volunteers for [his] 2018 [Golf Classic].”¹⁴⁴ The retreat was held at Reynolds, Lake Oconee, a luxury golf and lakeside resort located 80 miles southeast of Atlanta, Georgia.¹⁴⁵ The three attendees were described as supporters, constituents, and regular volunteers at the Golf Classic, but there was also some suggestion that they are friends with Rep. Bishop.¹⁴⁶
83. During the course of this retreat, Rep. Bishop and his guests played three rounds of golf at Reynolds.¹⁴⁷ The campaign committee paid for the greens fees, which cost \$1,278.72, \$1,226.88 and \$1,052.88 respectively.¹⁴⁸ Rep. Bishop and the retreat participants also drove down to Augusta National Golf Club on the afternoons of April 5th and 6th to watch the 2018 Masters Golf Tournament.¹⁴⁹

¹⁴⁰ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0048).

¹⁴¹ For example, the September and October 2018 billing statements show a \$487.00 charge and payment for dues and fees and yet the corresponding FEC Report of Receipts and Disbursements identifies the disbursement as a “fundraising” expense. *Compare* GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0511-13) *with* Sanford Bishop for Congress, FEC 12-Day Pre-Election Report of Receipts and Disbursements, filed October 25, 2018 at 18.

¹⁴² *Compare* GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0528-530) *with* Sanford Bishop for Congress, FEC Year-End Report of Receipts and Disbursements, filed January 26, 2018 at 32.

¹⁴³ Current Treasurer Transcript (Exhibit 2 at 19-3824_0121-22).

¹⁴⁴ Rep. Bishop Response Re: Reynolds Disbursement (Exhibit 35 at 19-3824_0687).

¹⁴⁵ Reynolds Lake Oconee, *Homepage*, <https://www.reynoldslakeoconee.com/> (last visited Jan. 21, 2020).

¹⁴⁶ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0055-60); Current Treasurer Transcript (Exhibit 2 at 19-3824_0133).

¹⁴⁷ Rep. Bishop Response Re: Reynolds Disbursement (Exhibit 35 at 19-3824_0687-88); Reynolds Golf Chits (Exhibit 36 at 19-3824_0690-92); Reynolds SunTrust Charges (Exhibit 37 at 19-3824_0694-96).

¹⁴⁸ Rep. Bishop Response Re: Reynolds Disbursement (Exhibit 35 at 19-3824_0687-88); Reynolds Golf Chits (Exhibit 36 at 19-3824_0690-92); Reynolds SunTrust Charges (Exhibit 37 at 19-3824_0694-96). The costs of these three rounds of golf were erroneously identified as “lodging” on the Sanford Bishop for Congress FEC report. *See* Sanford Bishop for Congress, FEC Quarterly Report of Receipts and Disbursements (Q2), filed July 15, 2018 at 57; *see also* Current Treasurer Transcript (Exhibit 2 at 19-3824_0132).

¹⁴⁹ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0059-60).

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84. During the retreat, Rep. Bishop and his party stayed at a cottage located on the resort.¹⁵⁰ The total cost of the lodging for three nights was \$2,343.03 and was paid by Rep. Bishop's campaign committee.¹⁵¹
85. According to Rep. Bishop, "the purpose of the retreat was to review and critique the previous tournament, identify strengths and weaknesses and plan for the 2018 [Golf Classic]."¹⁵² Rep. Bishop further explained that the retreat involved logistics discussions about the upcoming retreat.¹⁵³ He stated that these discussions occurred while the party was driving to various venues and during their rounds of golf.¹⁵⁴
86. While Rep. Bishop described this trip as campaign-related, the nature and length of the trip, the attendees, and the greens fees expenditures, raised personal use concerns for the OCE. Additionally, Rep. Bishop could produce no agendas, notes, correspondence, or other documentation from the weekend identifying tangible work performed in preparation for his 2018 Golf Classic.¹⁵⁵ The Golf Classic, which Rep. Bishop has held annually at GICC since 2013, includes over 200 golfers in recent years and does require significant advance planning.¹⁵⁶ However, the length of retreat, nature of the activities, attendees, and lack of any physical work product produced to the OCE suggests that this trip was, at least in part, personal in nature.

iv. Other Golf Expenditures

87. In addition to the golf expenditures identified above, the OCE determined that Rep. Bishop's campaign committee paid green fees at various other golf clubs, including the Army-Navy Country Club in May 2016,¹⁵⁷ and at various courses in and around Hilton Head, South Carolina during the past several Christmas holidays.¹⁵⁸ These greens fee expenditures were not a part of any specific fundraising events held by Rep. Bishop.¹⁵⁹ Instead, Rep. Bishop described these rounds of golf as outings in which he solicited support for his annual golf fundraiser.¹⁶⁰

¹⁵⁰ Rep. Bishop Response Re: Reynolds Disbursement (Exhibit 35 at 19-3824_0687-88).

¹⁵¹ *Id.*; At Home Vacation Rentals Amex Charge (Exhibit 38 at 19-3824_0700); Sanford Bishop for Congress, FEC Quarterly Report of Receipts and Disbursements (Q2), filed July 15, 2018 at 43.

¹⁵² Rep. Bishop Response Re: Reynolds Disbursement (Exhibit 35 at 19-3824_0687).

¹⁵³ *Id.*; Rep. Bishop Transcript (Exhibit 1 at 19-3824_0058).

¹⁵⁴ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0058).

¹⁵⁵ *Id.*; Current Treasurer Transcript (Exhibit 2 at 19-3824_0134).

¹⁵⁶ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0492-612); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0019-21; 0055-59).

¹⁵⁷ Rep. Bishop Response Re: ANCC Disbursement (Exhibit 39 at 19-3824_0704-05); ANCC Amex Charge (Exhibit 40 at 19-3824_0710); Sanford Bishop for Congress, FEC Amended Quarterly Report of Receipts and Disbursements (Q2), filed November 16, 2016 at 48.

¹⁵⁸ *See infra*, Section II.E.

¹⁵⁹ Rep. Bishop Response Re: ANCC Disbursement (Exhibit 39 at 19-3824_0704-05); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0052; 0070); Current Treasurer Transcript (Exhibit 2 at 19-3824_0128-29).

¹⁶⁰ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0051-52; 0070).

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E. Other Instances of Personal Use

88. During the course of this review, other instances of personal use came to the attention of the OCE. When questioned about these matters, Rep. Bishop acknowledged that his campaign committee had impermissibly paid for certain personal expenses.
89. For example, when asked about a \$660.00 ATM withdrawal from his campaign account, Rep. Bishop told the OCE that this amount was mistakenly used to pay for his granddaughter's school tuition.¹⁶¹ According to Rep. Bishop, his wife intended to remove the funds from his personal SunTrust account in order to pay the monthly tuition costs, but she accidentally removed them from the campaign's SunTrust account.¹⁶²
90. Additionally, Rep. Bishop acknowledged spending campaign funds on an \$18.99 on-demand movie at the Legacy Lodge at Lake Lanier Islands Resort.¹⁶³ Rep. Bishop stayed the night at the Legacy Lodge in 2017 as a part of the annual Davis-Smyre Invitational Golf Classic.¹⁶⁴
91. Rep. Bishop also told the OCE that he may have improperly spent campaign funds during trips to Hilton Head over the Christmas holiday. Rep. Bishop and his family rent a house each year in or around Hilton Head, South Carolina during the week of Christmas.¹⁶⁵ Rep. Jim Clyburn and his family also rent a home nearby and the families share a meal on Christmas day.¹⁶⁶ Rep. Bishop golfs that week with Rep. Clyburn and other politically connected individuals.¹⁶⁷
92. Bank statements suggest that Rep. Bishop's campaign committee spent money on groceries, liquor, and greens fees during this time of year in Hilton Head.¹⁶⁸ When asked whether any of the spending on food or drink could have been for personal use with his family or for the Christmas meal he shares with the Clyburns, he acknowledged it likely was.¹⁶⁹ Additionally, Rep. Bishop informed the OCE that the rounds of golf he participated in were not a part of any specific fundraiser he was holding.¹⁷⁰
93. In summary, the OCE saw a pattern of personal expenditures being paid with campaign funds. These were personal charges associated with fuel, golf expenses, meals, travel, tuition, and entertainment. These personal use expenditures either were made directly by Rep. Bishop or resulted from lack oversight by him of his campaign committee.

¹⁶¹ *Id.* (Exhibit 1 at 19-3824_0016); SunTrust Account Statement April 2019 (Exhibit 41 at 19-3824_0725).

¹⁶² Rep. Bishop Transcript (Exhibit 1 at 19-3824_0016). Rep. Bishop told the OCE that both the campaign and personal debit cards are SunTrust cards and have the same passcode. *Id.*

¹⁶³ Rep. Bishop Response Re: Legacy Lodge Disbursement (Exhibit 42 at 19-3824_0727); Legacy Lodge Invoice (Exhibit 43 at 19-3824_0730); Legacy Lodge Amex Charge (Exhibit 44 at 19-3824_0734); Rep. Bishop Transcript (Exhibit 1 at 19-3824_0054).

¹⁶⁴ Rep. Bishop Response Re: Legacy Lodge Disbursement (Exhibit 42 at 19-3824_0727); Rep. Bishop Response Re: Legacy Lodge Disbursement (Exhibit 42 at 19-3824_0727).

¹⁶⁵ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0068-73). Rep. Bishop told the OCE the rental homes were paid for with personal funds. *Id.* (Exhibit 1 at 19-3824_0070).

¹⁶⁶ *Id.* (Exhibit 1 at 19-3824_0068-73).

¹⁶⁷ *Id.*

¹⁶⁸ Sample Hilton Head Spending (Exhibit 45 at 19-3824_0740-85).

¹⁶⁹ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0071-72).

¹⁷⁰ *Id.* (Exhibit 1 at 19-3824_0070).

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94. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Bishop converted campaign funds from Sanford Bishop for Congress to personal use and Rep. Bishop's campaign committee expended funds that were not attributable to bona fide campaign or political purposes.

III. REP. BISHOP MAY HAVE MISUSED THE MRA FOR ANNUAL HOLIDAY PARTIES

A. Applicable Law, Rules, and Standards of Conduct

95. Federal Law

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.”

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.”

96. House Ethics Manual

The House Ethics Manual explains, “Members of Congress receive a Members’ Representational Allowance (‘MRA’), which is available to support the conduct of official and representational duties to the district from which they are elected. Statutory authorizations often note that such allowances are for expenses of an ‘official purposes’ or a ‘strictly official’ nature. Legal and ethical problems arise when these allowances are used for other than official expenses, such as when they are converted to personal or campaign use.”¹⁷¹ The Manual goes on to emphasize that “[t]he MRA may not be used to pay for any expenses related to activities or events that are primarily social in nature, personal expenses, campaign or political expenses, or House committee expenses. Members may be personally liable for misspent funds or expenditures exceeding the MRA.”¹⁷² Additionally, the Manual notes Members are “responsible for assuring that resources provided for support of official duties are applied to the proper purposes.”¹⁷³

97. Member’s Congressional Handbook

Pursuant to the Members’ Congressional Handbook: “Only expenses the primary purpose of which are official and representational and which are incurred in accordance with the [Members’ Representational] Handbook are reimbursable.”¹⁷⁴ Specifically, “Members and

¹⁷¹ Manual at 323.

¹⁷² *Id.*

¹⁷³ *Id.* at 324 (citing *In the Matter of Representative Austin J. Murphy*, H. Rep. 100-485, 100th Cong., 1st Sess. 4 (1987)).

¹⁷⁴ Committee on House Administration, Members’ Congressional Handbook, 116th Congress, at 2 (2018).

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employees may not be reimbursed for food and beverage expenses related to social activities or social events (e.g., hospitality, receptions, entertainment, holiday or personal celebrations, and swearing-in or inauguration day celebrations).”¹⁷⁵

Additionally, the Handbook explains that, “[e]ach Member is personally responsible for the payments of any official and representational expenses incurred that exceed the provided MRA or that are incurred but are not reimbursable under these regulations.”¹⁷⁶

98. Committee Precedent

As the Committee explained in In the Matter of Allegations Relating to Representative Luis V. Gutiérrez, “where Members have used official funds for impermissible purposes, the Committee has regularly directed them to repay any misspent funds. This requirement has most frequently arisen in circumstances where official funds were used for a Member’s personal benefit or to benefit their campaign . . . However, the Committee has also made clear that a Member is responsible to repay MRA funds used for impermissible purposes, even where neither the Member nor the Member’s campaign benefitted from the use of official funds.”¹⁷⁷

B. Rep. Bishop May Have Used Congressional Funds to Pay for Annual Holiday Parties

99. In December 2015, 2016, 2017 and 2018, Rep. Bishop held banquets at GICC.¹⁷⁸ These events were paid for with MRA funds.¹⁷⁹ The OCE found evidence suggesting that these gatherings were annual holiday celebrations thrown by Rep. Bishop and his wife for their respective staffs.

100. GICC Banquet Coordinator – who planned and managed these annual events on behalf of GICC – described them as “joint staff Christmas part[ies],” attended by both Rep. Bishop and Mrs. Bishop’s staffs.¹⁸⁰ As Clerk of the Municipal Court in Columbus Georgia, Mrs. Bishop has a staff of approximately twenty individuals.¹⁸¹ GICC Banquet Coordinator further described the event as a typical holiday party, with dinner, dancing, socializing, and “very little content.”¹⁸²

¹⁷⁵ *Id.* at 16.

¹⁷⁶ *Id.* at 2.

¹⁷⁷ *In the Matter of Allegations Relating to Representative Luis V. Gutiérrez*, 115th Congress, 2d Sess. (2018) at 27-28.

¹⁷⁸ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0508; 0528; 0554; 0578); BBC Holiday Social Banquet Forms (Exhibit 46 at 19-3824_0787-98).

¹⁷⁹ GICC Monthly Billing Statements (Exhibit 28 at 19-3824_0492-612); GICC Treasury Checks (Exhibit 47 at 19-3824_0800-03); Statement of Disbursements of the House, January 1, 2019 – March 31, 2019; Statement of Disbursements of the House, January 1, 2018 – March 31, 2018; Statement of Disbursements of the House, January 1, 2017 – March 31, 2017; Statement of Disbursements of the House, January 1, 2016 – March 31, 2016.

¹⁸⁰ GICC Banquet Coordinator Transcript (Exhibit 34 at 19-3824_0662; 0670-73; 0678).

¹⁸¹ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0022).

¹⁸² GICC Banquet Coordinator Transcript (Exhibit 34 at 19-3824_0673).

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101. Current Treasurer similarly described the annual event as a holiday social thrown by Rep. Bishop and his wife for their respective staffs.¹⁸³ She explained that staff members also received a “plus one” for their spouse or significant other.¹⁸⁴ Current Treasurer, who has attended the event, explained that there was dinner, live entertainment, and dancing at the annual gatherings.¹⁸⁵
102. Internal GICC documents describe the event as either the “Congressman Bishop Christmas Party” or “BBC Holiday Social.”¹⁸⁶ Several banquet event order forms note that a dance floor was requested and a saxophonist attended with DJ equipment.¹⁸⁷
103. GICC Banquet Coordinator explained that Rep. Bishop or his wife asked to receive separate food and alcohol bills for these events.¹⁸⁸ Given the limitations of GICC’s catering management software, GICC Banquet Coordinator would create two separate invoices in Microsoft Word.¹⁸⁹ After receiving initial copies of the bills, Rep. Bishop or Mrs. Bishop called and specifically asked that the food invoice be labeled as a “Constituents Meeting,” but GICC Banquet Coordinator confirmed that this invoice was for the annual holiday party.¹⁹⁰
104. Documents obtained by the OCE indicate that these “Constituent Meeting” invoices were submitted to the House Finance Office by Rep. Bishop and subsequently paid using MRA funds.¹⁹¹ Voucher Sheets submitted to House Finance indicate that the requested payments are for food and beverage for “constituents to discuss legislative business.”¹⁹²
105. Below is a chart outlining the date of these events, number of attendees, and payment by the U.S. Treasury for each of these gatherings:¹⁹³

Date	Number of Attendees	Payment by the Treasury
Dec. 17, 2018	165	\$6,468.66
Dec. 19, 2017	90	\$3,528.36
Dec. 20, 2016	112	\$4,976.29
Dec. 14, 2015	40	\$1,114.56
Total Payments by the Treasury:		\$16,087.87

¹⁸³ Current Treasurer Transcript (Exhibit 2 at 19-3824_0122; 0124-25).

¹⁸⁴ *Id.* (Exhibit 2 at 19-3824_0125).

¹⁸⁵ *Id.* (Exhibit 2 at 19-3824_0124-25).

¹⁸⁶ BBC Holiday Social Banquet Forms (Exhibit 46 at 19-3824_0787-98).

¹⁸⁷ *Id.*

¹⁸⁸ GICC Banquet Coordinator Transcript (Exhibit 34 at 19-3824_0670).

¹⁸⁹ *Id.*; BBC Holiday Social Banquet Forms (Exhibit 46 at 19-3824_0787-98).

¹⁹⁰ GICC Banquet Coordinator Transcript (Exhibit 34 at 19-3824_0670).

¹⁹¹ BBC Holiday Social Voucher Submissions (Exhibit 48 at 19-3824_0805-14); GICC Treasury Checks (Exhibit 47 at 19-3824_0800-03); Statement of Disbursements of the House, January 1, 2019 – March 31, 2019; Statement of Disbursements of the House, January 1, 2018 – March 31, 2018; Statement of Disbursements of the House, January 1, 2017 – March 31, 2017; Statement of Disbursements of the House, January 1, 2016 – March 31, 2016. OCE staff confirmed with GICC Banquet Coordinator that no separate bills were sent to Mrs. Bishop or the municipal court for costs associated with Mrs. Bishop’s staff.

¹⁹² BBC Holiday Social Voucher Submissions (Exhibit 48 at 19-3824_0806; 0809).

¹⁹³ Figures compiled from the GICC banquet event order forms and GICC Treasury checks identified above.

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106. When asked about these annual gatherings, Rep. Bishop denied that they were holiday gatherings and insisted that they were end of the year “constituent meetings.”¹⁹⁴ He also stated the following: “We can’t have Christmas parties [with MRA funds], but we can have constituent meetings and it’s the end of the year. So, it’s like a holiday gathering, but it’s actually a constituent meeting.”¹⁹⁵
107. Rep. Bishop’s denials about the nature of these events was further undercut by his acknowledgment that both his staff and his wife’s staff attended with their significant others.¹⁹⁶ Additionally, he acknowledged that other staff members from the courthouse were invited, including the Sheriff’s office and Municipal Court Marshalls, both of which provided security support for him while he was in his district.¹⁹⁷ When asked how individuals were invited to this event, he suggested it was via “word of mouth” and anyone from anywhere in his congressional district could come if they heard about the meeting.¹⁹⁸
108. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Bishop spent a portion of his MRA on annual holiday celebrations.

IV. CONCLUSION

109. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Bishop converted campaign funds from Sanford Bishop for Congress to personal use or that Rep. Bishop’s campaign committee expended funds that were not attributable to bona fide campaign or political purposes.
110. Accordingly, the Board recommends that the Committee further review the above allegation that Rep. Bishop converted campaign funds from Sanford Bishop for Congress to personal use or that Rep. Bishop’s campaign committee expended funds that were not attributable to bona fide campaign or political purposes.
111. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Bishop spent MRA funds on annual holiday celebrations.
112. Accordingly, the Board recommends that the Committee further review the above allegation that Rep. Bishop spent MRA funds on annual holiday celebrations.

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

113. The following entity, by declining to provide information as requested by the OCE, did not cooperate with the OCE review:

- a. Synovus Bank.

¹⁹⁴ Rep. Bishop Transcript (Exhibit 1 at 19-3824_0041-45).

¹⁹⁵ *Id.* (Exhibit 1 at 19-3824_0041).

¹⁹⁶ *Id.*

¹⁹⁷ *Id.* (Exhibit 1 at 19-3824_0040-45).

¹⁹⁸ *Id.* (Exhibit 1 at 19-3824_0041-43).

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114. The Board recommends that the Committee on Ethics issue a subpoena to Synovus Bank.