

June 29, 2026

Mr. Omar Ashmawy
Staff Director and Chief Counsel
Office of Congressional Conduct
U.S. House of Representatives
P.O. Box 895
Washington, DC 20515-0895

Re: Request for Investigation into Representative Mike Turner

Dear Mr. Ashmawy:

I respectfully request that the Office of Congressional Conduct immediately investigate whether Rep. Mike Turner has converted campaign funds to personal use and filed a campaign finance report with false information in violation of federal law and the Rules of the House of Representatives.

Based on public reports filed with the Federal Election Commission (the “Commission”), it appears Rep. Turner (i) converted campaign funds to personal use by paying for personal dining at luxury restaurants and personal lodging in cities where he already owns residential property and (ii) filed a campaign finance report with blatantly false information on it. If true, these actions would violate House Rules and the Federal Election Campaign Act.

These types of violations undermine the very rules designed to promote transparency and protect the integrity of our democratic institutions. Failure to comply with these rules threatens to discredit the House as a whole. I respectfully request that you promptly investigate these allegations and refer the matter to the House Ethics Committee for further review.

I. Factual Background

Representative Mike Turner represents Ohio’s 10th Congressional District.¹ He is running for re-election in 2026 and his principal campaign committee is Citizens for Turner (the “Campaign”).²

In 2025 alone, the Campaign reported to the FEC that it spent over \$55,000 on restaurants, all with the purpose description of “meeting expense.”³ These expenses include:

- Over \$9,000 at the Engineers Club of Dayton

¹ Mike Turner, <https://turner.house.gov/> (last visited Apr. 20, 2026).

² Rep. Michael R. Turner, FEC Form 2, Amended Statement of Candidacy (filed Sept. 24, 2025), <https://docquery.fec.gov/pdf/845/202509249790384845/202509249790384845.pdf>; Citizens for Turner, FEC Form 1, Amended Statement of Organization (filed Sept. 24, 2025), <https://docquery.fec.gov/pdf/839/202509249790384839/202509249790384839.pdf>.

³ Citizens for Turner, Disbursements (last visited Apr. 20, 2026), https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00373001&min_date=01%2F01%2F2025&max_date=12%2F31%2F2026&disbursement_description=meeting+expense.

- Over \$8,500 at The Monocle, a steakhouse in Washington, D.C.
- Over \$7,600 at the Capitol Hill Club in Washington, D.C.
- Over \$3,400 at Pine Club, a steakhouse in Dayton, Ohio
- Over \$2,900 at Oakwood Club, a steakhouse in Oakwood, Ohio
- Over \$1,900 at Osaka Japanese Steakhouse in Beavercreek, Ohio
- Over \$1,900 at Fogo de Chao, a Brazilian steakhouse in Washington, D.C.
- Over \$1,700 at Nobu, a high-end, luxury restaurant group in Miami and Washington, D.C.
- Over \$500 at Lanai at Mamala Bay, in Honolulu, Hawaii

Also in 2025, the Campaign reported spending over \$23,000 on lodging expenses—including over \$10,000 for multiple hotels in the Washington, D.C. (despite the fact that Representative Turner owns a home near the Capitol), and over \$8,000 for lodging expenses in Rep. Turner’s hometown of Dayton, Ohio.⁴ Additionally, the Campaign allegedly spent over \$2,500 at the “Trump International Hotel DC” in the first quarter of 2025 despite the fact that the hotel has not existed since 2022.⁵ Moreover, Turner’s Campaign also spent more than \$600 on “Lodging” at the Carlton Club—one of London’s “foremost members-only clubs.”⁶

II. Legal Analysis

Based on the facts described above, it appears that Rep. Turner and his Campaign may have violated the Act and House Rule XXIII, clause 6 by (i) converting campaign funds for personal use for luxurious dining and lodging, and (ii) filing campaign finance reports containing false information about its disbursements. Moreover, these actions also violate House Rule XXIII, clause 1, by threatening to discredit the House.⁷

a. Rep. Turner May Have Converted Campaign Funds to Personal Use

As noted above, House Rules and federal law also prohibit Members from using campaign funds for personal purposes. Specifically, House Rule XXIII, clause 6, provides that Members (a) “shall keep [their] campaign funds separate from [their] personal funds”; (b) “may not convert

⁴ Citizens for Turner, Disbursements (last visited Apr. 20, 2026), https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00373001&min_date=01%2F01%2F2025&max_date=12%2F31%2F2026&disbursement_description=lodging; Rep. Michael R. Turner, Financial Disclosure Report (May 11, 2025) (showing a mortgage for a personal residence in DC), https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2024/10066268.pdf.

⁵ Citizens for Turner, Disbursements (last visited Apr. 20, 2026), https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00373001&recipient_name=trump&min_date=01%2F01%2F2025&max_date=12%2F31%2F2026&disbursement_description=lodging; Trump sells Washington hotel to Miami-based investor group, NPR (May 12, 2022), <https://www.npr.org/2022/05/12/1098469857/trump-sells-washington-hotel>.

⁶ Citizens for Turner, Disbursements (last visited Apr. 21, 2026), https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00373001&recipient_name=carlton+club&two_year_transaction_period=2026&min_date=01%2F01%2F2025&max_date=12%2F31%2F2026; The Carlton Club, <https://carltonclub.co.uk/>.

⁷ House R. 23, cl. 1. *See* House Ethics Manual at 15 (noting that House Rule XXIII, cl. 1 has been invoked against Members for “engaging in a pattern and practice of conduct in which campaign funds were converted to personal use.”).

campaign funds to personal use in excess of an amount representing reimbursement for **legitimate** and **verifiable** campaign expenditures”; and (c) “may not expend funds from a campaign account...that are not attributable to bona fide campaign or political purposes.”⁸ As the House Ethics Manual summarizes these requirements, Members “may not convert campaign funds or resources to personal use, and must be able to verify that campaign resources have not been so misused.”⁹ A 2024 pink sheet by the Committee on Ethics on personal use further details that Members must maintain records that document the primary purpose of each campaign expenditure.¹⁰

Personal use is “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.”¹¹ In other words, an impermissible personal use of campaign funds occurs when a candidate uses campaign funds to pay an expense that they would have incurred even if they were not running for office.¹² Under federal campaign finance regulations, the Commission determines whether expenses for meals and travel constitute impermissible personal use on a case-by-case basis.¹³ Commission guidance explains that although campaign funds may be used for meals during face-to-face fundraising events, they may not be used, for example, to pay for a candidate’s family to go out to dinner.¹⁴ The Commission has also stated that campaign funds may not be used “for a leisure outing at which the discussion occasionally focuses on the campaign or official functions.”¹⁵ The Committee on Ethics has made clear that meals may not be paid for with campaign funds merely because they involved an incidental political or official conversation; the primary purpose *must be* campaign related.¹⁶

As shown above, Rep. Turner and his Campaign regularly spend enormous amounts of campaign funds on high-end steakhouses and luxury restaurants. In 2025 alone, Rep. Turner and his Campaign used campaign funds to pay for meals at Osaka Japanese Steakhouse on 13 separate occasions, the Capitol Hill on 11 occasions, and The Monocle on 10 occasions, and the Engineers Club of Dayton on 12 occasions. He even charged a meal at The Lanai at Mamala Bay—a restaurant in Honolulu. Expenses like these are considered prohibited personal use unless they are directly related to a campaign purpose and would not have existed irrespective of Rep. Turner’s campaign for federal office or his duties as a federal officeholder. Given the frequency and high value of these expenses, there are serious questions about whether these were for leisure outings or actually for legitimate and verifiable fundraising events for the Campaign.

⁸ House R. 23, cl. 6.

⁹ House Ethics Manual at 162.

¹⁰ Committee on Ethics, Legitimate and Verifiable Use of Campaign Funds (Dec. 30, 2024), <https://ethics.house.gov/wp-content/uploads/2024/12/FINAL-Legitimate-and-Verifiable-Use-of-Campaign-Funds-Pink-Sheet.pdf>.

¹¹ House Ethics Manual at 180 (quoting 11 C.F.R. § 113.1(g)).

¹² *Id.*

¹³ *See* 11 C.F.R. § 113.1(g)(1)(ii)(B).

¹⁴ Fed. Election Comm’n, Campaign Guide for Congressional Candidates at 65 (Oct. 2021), <https://www.fec.gov/resources/cms-content/documents/policy-guidance/candgui.pdf>.

¹⁵ *Id.*

¹⁶ Committee on Ethics, Legitimate and Verifiable Use of Campaign Funds (Dec. 30, 2024), <https://ethics.house.gov/wp-content/uploads/2024/12/FINAL-Legitimate-and-Verifiable-Use-of-Campaign-Funds-Pink-Sheet.pdf>.

As a result, there are real doubts about the legality of these expenses and whether they may constitute prohibited personal use.

Moreover, this is not the first time allegations of impropriety have been made against Rep. Turner's campaign spending. According to a 2020 Politico analysis, Rep. Turner spent over \$70,000 on more than 370 meals over a three-year period.¹⁷ Taken together, ethics watchdogs said that his Campaign's spending suggests "a consistent pattern: Turner uses his donors to subsidize his personal dining costs, expensing an average of two meals a week."¹⁸

Rep. Turner's lavish spending of campaign funds on potentially personal expenses is not just limited to meals. His campaign also regularly spends money on upscale hotels – including in locations where Rep. Turner owns a home. For example, just in 2025, Rep. Turner's campaign spent more than \$10,000 on hotels throughout the Washington D.C. area despite him owning a home in D.C. He also spent over \$8,000 on lodging expenses in Dayton, Ohio, despite also owning a property there. These expenses were not reported as officially-connected expenses for travel for official staff. So, it begs the question—if Rep. Turner has a home to return to at night in these locations, what "legitimate and verifiable" campaign purpose exists to justify spending money on these hotels? If the expenses would have existed irrespective of the Congressman's campaign, then these payments constitute illegal personal use of campaign funds.

This potential impermissible campaign spending cannot go unaddressed. The Office of Congressional Conduct should immediately investigate Rep. Turner and his Campaign for potentially spending campaign funds for personal use in violation of the Act and Commission regulations.

b. Citizens for Turner Appears to Have Filed a Report Containing False Information

Federal law and Commission regulations require authorized political committees like the Campaign to regularly file reports disclosing their receipts and disbursements.¹⁹ When an authorized committee makes a disbursement exceeding \$200, the report must itemize that disbursement by reporting the recipient's name and address and the date, amount, and purpose of the expenditure.²⁰ False and inaccurate reports undermine the Act's objectives of preventing corruption and bringing transparency to American elections. Congress rightfully determined that accurate reporting of campaign expenditures and contributions was so important that the Act subjects individuals who misreport campaign expenditures to steep financial penalties and even imprisonment.²¹

¹⁷ Ally Mutnick, GOP congressman spent \$70K in campaign cash on meals, Politico (Sept. 8, 2020), <https://www.politico.com/news/2020/09/08/mike-turner-campaign-money-meals-410344>.

¹⁸ *Id.*

¹⁹ 52 U.S.C. § 30104(b); 11 C.F.R. §§ 104.3(a), (b).

²⁰ 52 U.S.C. § 30104(b)(5)(A); 11 C.F.R. § 104.3(b)(4).

²¹ *See, e.g.*, 52 U.S.C. § 30109(d)(1)(A)(ii).

As noted above, Citizens for Turner reported two expenditures totaling over \$2,500 to “Trump International Hotel DC” in January and March 2025.²² Both expenditures listed “Lodging” as the purpose of the disbursement. But, famously, the Trump International Hotel DC was sold in May 2022 and has not existed for nearly four years.²³ By reporting a disbursement to a defunct entity, the Campaign appears to have blatantly violated the law and lied to the public. Moreover, it raises concerns about the truthfulness of every other piece of information on the Campaign’s reports. Can the public really trust the Campaign is properly and accurately disclosing its disbursements when it appears to have blatantly lied about the recipient of more than \$2,500 in lodging expenses? What other disbursements has the Campaign potentially lied about?

Accordingly, based on the above information it appears that Representative Turner and his Campaign have plainly violated 52 U.S.C. § 30104 by filing at least one campaign finance report containing blatantly false information. Furthermore, the Campaign’s reports raise serious questions about whether they have repeatedly violated 52 U.S.C. § 30114(b) by converting campaign funds to personal use.

III. Request for Action

As demonstrated above, the facts strongly suggest that Rep. Turner and his campaign appear to have violated federal law and the Rules of the House of Representatives by filing a false campaign finance report and converting campaign funds to personal use. There are no violations that undermine the public’s faith in the election system and in our elected officials more than a candidate using their campaign as a personal ATM and lying to the public about how those funds were actually used. Given the severity of the alleged conduct, I respectfully request that the Office of Congressional Conduct immediately commence an investigation into this matter.

I understand that 18 U.S.C. § 1001 applies to the information I am providing. To the best of my knowledge and ability, all evidence submitted was not obtained in violation of any law, rule, or regulation.

Sincerely,

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²² Citizens for Turner, Disbursements (last accessed Apr. 21, 2026), https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00373001&recipient_name=Trump&two_year_transaction_period=2026&min_date=01%2F01%2F2025&max_date=12%2F31%2F2026.

²³ Dareh Gregorian, Trump Organization completes \$375 million sale of D.C. hotel, NBC News (May 11, 2022), <https://www.nbcnews.com/politics/donald-trump/trump-organization-completes-375-million-sale-dc-hotel-rcna28428>.