



FEDERAL ELECTION COMMISSION

In the Matter of:

Sinema for Arizona (C00508804);
Sinema Leadership Fund (C00789834);
Getting Stuff Done PAC (C00571182);
Kyrsten Sinema (S8AZ00197), a candidate for U.S. Senator for Arizona.

COMPLAINT

Change for Arizona 2024 PAC (“Complainant”) brings this complaint under 52 U.S.C. § 30109(a)(1) and 11 C.F.R. § 111.4 against Sinema for Arizona (C00508804), Sinema Leadership Fund (C00789834), Getting Stuff Done PAC (C00571182) (collectively “the Committees”), and Senator Krysten Sinema, a candidate for U.S. Senator for Arizona (S8AZ00197) (together with the Committees, “Respondents”), alleging Respondents committed serious violations of the Federal Election Campaign Act of 1971, as amended, 52 U.S.C. § 30101 *et seq.*, and of the Commission’s regulations.

Specifically, Complainant alleges that Senator Sinema, through her Committees, illegally diverted funds that were donated to her for campaigning for federal office by making expenditures for her personal use and benefit (collectively “the Expenditures”). Complainant further alleges that the Committees violated disclosure regulations by filing campaign spending reports which falsely represented that the Expenditures were legitimate uses of campaign funds.

Senator Kyrsten Sinema spent over \$180,000 in campaign, PAC, and Senate funds on luxury hotels and resorts, car services, expensive charter flights, high-end restaurants, and winery visits and purchases from 2019 to 2022. Campaign donors, many from the same Wall Street and private equity firms that have benefitted from Senator Sinema’s legislative actions, including her protection of the carried interest loophole, appear to have financed Senator Sinema’s athletic avocation, luxury accommodations, Michelin-star meals, limousine service, and international travel to cities including

Paris, London, and Barcelona. These lavish expenditures appear to serve no legitimate campaign purpose.

Complainant alleges that Senator Sinema has been living a lifestyle of luxury financed by her special interest donors, to the detriment of her constituents in Arizona. While Sinema is on international trips or running marathons or pursuing her high-end wine hobby—each of which has been subsidized by campaign donors—Arizona families are struggling with an increased cost of living and a housing crisis partially fueled by the very same private equity firms that donate to Senator Sinema’s campaigns.

COUNT I:
Senator Sinema Converted Campaign Funds for Personal Use

Complainant alleges that Respondents converted contributions to Senator Sinema’s political committees for her personal use, in violation of 52 U.S.C. § 30114(b) and 11 C.F.R. § 113.1. Under § 30114(b)(2) “[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....” *See also* 11 C.F.R. § 113.1(g).

A. Respondents Spent Over \$180,000 of Campaign, PAC, and Senate Funds on Services Including Luxury Hotels and Resorts, Car Services, Chartered Flights, High-End Restaurants, and Wine from 2019 to 2022

Campaign finance reports establish that Senator Sinema disbursed approximately \$180,000 (in funds of the Sinema for Arizona Committee, the Sinema Leadership Fund, and the Getting Stuff Done PAC) from 2019 to 2022 on services including the following:

- Nights at luxury hotels, resorts, and spas
- Wine and alcohol expenses, including over 30 payments made to wineries
- Meals at high-end restaurants
- Ground transportation via car service and limousine
- Charter air travel

These Expenditures are enumerated by category in more detail in Appendix 1. In summary:

Luxury hotels and resorts:¹ Respondents made 51 Expenditures of campaign and PAC funds totaling \$35,702.28 to at least 17 luxury hotels, resorts, and spas in France, the United Kingdom, and other destinations during the period in question. They included repeated payments of campaign and PAC funds to two hotels in Paris, France (the Le Roch Hotel and Spa, a member of the Five Star Alliance, on 10/13/21, 10/18/21, and 10/12/22, and the Hotel Lancaster, a member of the Five Star Alliance’s “Leading Hotels of the World,” on 10/19/22), a luxury resort in Northern California (more than \$3,300 to the Rosewood Sand Hill, on 8/12/21, 4/5/22, and 10/28/22), to Utah and Colorado ski resorts (Vail Resorts, the St. Regis Deer Valley, and the Waldorf-Astoria Park City, on 2/4/19, 1/24/20, 4/13/20,

¹ Compiled from FEC Disbursement Reports of the Committees, 2019-2022 (hereinafter “FEC Disbursement Reports”), accessed 2/6/2023. Summary report (PNG image) at https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/CAA1975ECEA6_Screenshot_2023-02-08_203215.png.

and 1/16/21), and to the Wynn Las Vegas Hotel and Casino (on 3/4/20 and 3/8/20). During this period Senator Sinema made 13 separate Expenditures for stays at W Hotels, Marriott International's luxury hotel brand. Respondents' expenditures on all hotels (of which her luxury hotel expenses are a subset) were over \$105,000 between 2019 and 2022, compared to the under \$10,000 each that *The Daily Beast* reported was spent by Senate candidates Jon Tester of Montana and Jacky Rosen of Nevada, both of whom (like Senator Sinema) will next be up for election in 2024.²

Wine and alcohol: Respondents made nearly \$20,000 in campaign and PAC Expenditures for wine and alcohol-related expenses during the period in question,³ including \$14,387.91 at 14 wineries in California and Oregon, and a \$4,633 payment to Valley Wine Merchants of Newberg, Oregon (on 5/6/21).

Expensive restaurants: Respondents have made more than \$9,000 in campaign and PAC Expenditures on meals at expensive restaurants since 2021,⁴ including Michelin-starred and Michelin-recommended restaurants in France, Spain, the United Kingdom, and Miami. Senator Sinema spent campaign or PAC funds at Michelin-starred Pied-a-Terre and Sketch in London (on 10/13/21 and 10/18/21), at Michelin-starred Atempo in Barcelona (on 8/29/22), at the pricey Buddha-Bar in Paris (on 10/18/21), at Les Remparts in Eze, on the French Riviera (on 10/26/22), at the Domino at London's Hotel Café Royal (on 11/8/21), and at New York's iconic Russian Tea Room (12/7/22), where entrees start at \$38 and imported caviar goes for \$200 an ounce and up.⁵

Car service and limousine transportation: Respondents have made an astonishing \$45,000 in campaign and PAC Expenditures on chauffeured car services.⁶ On multiple occasions, Senator Sinema appears to have spent thousands of dollars in campaign and PAC funds for car service transportation in a single city in a single day. For instance, she made three separate disbursements over \$4,000 in campaign or PAC funds to Attitude New York, a luxury car service (\$4,793.39 on 5/26/22, \$4,286.65 on 10/21/22, \$4,672.25 on 12/7/22).

Charter air travel: As detailed below, Respondents spent more than \$70,000 in campaign, PAC, and Senate funds on charter flights in a 12-month period from 2021 to 2022, almost all for flights within Arizona, some as short as 150 miles.

² Sam Brodey, "How Kyrsten Sinema Uses Campaign Cash for Her Marathon Habit," *The Daily Beast*, May 14, 2023, <https://www.thedailybeast.com/how-kyrsten-sinema-uses-campaign-cash-for-her-marathon-habit>, accessed May 15, 2023

³ FEC Disbursement Reports, accessed 2/6/2023. Summary report (PNG image) at https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/F6B087135862_Screenshot_2023-02-06_at_9.40.17_AM.png

⁴ FEC Disbursement Reports, <https://docquery.fec.gov/cgi-bin/forms/C00571182/1684893/sb/ALL>, accessed 1/31/2023; FEC Disbursement Reports, accessed 2/8/2023, summary report (PNG image) at https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/B4FB90FD2866_Screenshot_2023-02-08_204053.png

⁵ <https://russiantearoomnyc.com/menus/dinner/>, accessed 5/4/2023

⁶ FEC Disbursement Reports, accessed 2/8/2023, summary report (PNG image) at https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/D487867EB35E_Screenshot_2023-02-08_131619.png; FEC Disbursement Reports, <https://docquery.fec.gov/cgi-bin/forms/C00571182/1684893/sb/ALL>, accessed 1/31/2023; FEC Disbursement Reports, <https://docquery.fec.gov/cgi-bin/forms/C00789834/1684861/sb/ALL>, accessed 1/31/2023

Respondents' total expenditures on airfare are outside the norm. As reported in *The Daily Beast*, Senate candidates Tester and Rosen spent \$18,300 and \$23,600 respectively in campaign or PAC funds on airfare between 2019 and 2022; Senator Sinema spent over \$117,000.⁷

"Any time you see someone spend four, five, six times in a category from one of their comparables, it definitely raises a question of whether that's a legitimate use of campaign funds—and certainly, even if it is legitimate, whether it is appropriate," according to Saurav Ghosh, a former campaign finance attorney now at the nonpartisan Campaign Legal Center.⁸

B. Many of the Expenditures Were Made to Luxury and Upscale Establishments and Businesses, Many in Places Not Typically Visited for Campaign Purposes

Many of the Expenditures were made to establishments known and advertised to be luxurious, upscale, or high-end providers of the Services. Their costs and rates are significantly above the median for providers of the Services. Many of these hotels, restaurants, and wineries are in locations that a candidate for the United States Senate from Arizona would not be reasonably likely to be called upon to visit for campaign purposes in the ordinary course of business, including Paris, London, and Barcelona. For example:

- The Respondents made 51 separate payments to at least 17 unique highly rated luxury hotels and resorts located in California, Utah, Arizona, Nevada, Colorado, France, London.
- The Respondents spent nearly \$10,000 on fancy meals, including using campaign funds at Michelin starred or recommended restaurants in France, Barcelona, London, California, and Miami. Sinema has even appeared to use campaign funds to check off her personal restaurant wishlist: in 2020, on Instagram, Sinema tagged her partner in a San Diego restaurant's post and gawked over their food; in 2022, Sinema's campaign spent over \$600 at that restaurant.⁹
- The Respondents spent nearly \$20,000 on wine and alcohol-related expenses, including numerous west coast vineyards and wineries.

C. The Expenditures Are Not Typical of Those Made in the Ordinary Course of Business by a Political Campaign Committee Subject to FEC Regulation

The kinds of Expenditures summarized above and detailed in Appendix A are not typical of those made in the ordinary course of business by a political campaign committee. Upon reviewing Respondents' financial disclosures, Thomas Jones, of the American Accountability Foundation, a nonprofit government oversight and research organization¹⁰ that tracks political spending, said Senator Sinema

⁷ Brodey, "How Kyrsten Sinema Uses Campaign Cash," above

⁸ Brodey, "How Kyrsten Sinema Uses Campaign Cash," above

⁹ Instagram, @Civico1845, February 23, 2020, https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/0AAD96BD0A6_Screen_Shot_2023-01-19_at_10.42.52_PM.png; FEC Disbursement Reports, accessed 2/6/23, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00508804&committee_id=C00571182&committee_id=C00789834&recipient_name=civico&two_year_transaction_period=2022&min_date=01/01/2021&max_date=12/31/2022

¹⁰ <https://americanaccountabilityfoundation.com>, accessed 5/4/2023

“appears to be an outlier. Donors generally want candidates spending their money on winning their races, not on expensive meals and fancy destinations.”¹¹

It is particularly unusual for a political campaign in Arizona, a state with a small wine industry constituency, to spend almost \$20,000 at vineyards and specialty wine merchants in winemaking states outside Arizona.

The Expenditures are unusual enough that they have caught the attention of the investigative press. For example, a report in *Newsweek* about the largest Congressional spenders on charter flights called out Respondents’ high spending.¹² Among the Expenditures detailed in Appendix A are disbursements of \$23,070 for charter flights on August 8-9, 2022, \$11,997 on August 23-24, 2021, \$9,503 on May 6, 2022, \$8,982 on April 11, 2022, \$6,950 on February 22-23, 2022, and \$6,934 on November 9, 2021.¹³ The total spending over a period of just 12 months was an astonishing \$70,000 in both Senate and campaign funds, almost entirely for flights within Arizona—some as short as 150 miles.

D. The Expenditures Were Incurred During a Period in Which Senator Sinema Was Not Actively Campaigning, and She Refused to Acknowledge Whether She Is Actually Running for Office

Senator Sinema was elected to the Senate in November of 2018, and her term runs through 2025. During the period in question (2019 to 2022, the first three years of a six-year Senate term), she was not actively running a fully operational re-election campaign, and no major-party candidates had formally or informally declared their intent to run against her in a future election. Given that Senator Sinema was not actively running for office at any time during the period the Expenditures were made, the Expenditures seem disproportionate to any legitimate need her campaign may have had to purchase the above mentioned services in such volume.

As Senator Sinema has left the Democratic Party and is now an Independent, the next election in which she could face an opponent is on November 5, 2024, almost a year and a half in the future. She has not declared her intent to compete in that election; in fact, as recently as April 21, 2023, on the record and

¹¹ Lydia Moynihan, “Kyrsten Sinema spent more than \$100K in campaign cash on jets, limos, luxury hotels and wine,” April 20, 2023, <https://nypost.com/2023/04/20/kyrsten-sinema-spent-more-than-100k-on-jets-limos-luxury-hotels-and-wine/>, accessed 5/5/2023

¹² Michael Scott Davidson, “Taxpayers fuel pricey private flights for Gillibrand, Schumer, other senators,” December 9, 2022, <https://www.newsweek.com/taxpayers-fuel-pricey-private-flights-gillibrand-schumer-other-senators-1765170>, accessed 5/4/2023

¹³ Report of the Secretary of the Senate, 11/14/2022, <https://www.govinfo.gov/content/pkg/GPO-CDOC-117sdoc14/pdf/GPO-CDOC-117sdoc14.pdf>; Report of the Secretary of the Senate, 6/15/2022, <https://www.govinfo.gov/content/pkg/GPO-CDOC-117sdoc10/pdf/GPO-CDOC-117sdoc10.pdf>; FEC Disbursement Reports, accessed 2/8/23, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00571182&recipient_name=nextera&two_year_transaction_period=2022&min_date=01%2F01%2F2021&max_date=12%2F31%2F2022; FEC Disbursement Reports, accessed 2/7/23, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00508804&committee_id=C00571182&committee_id=C00789834&recipient_name=lupa

on camera, she declined to comment to a television news reporter for Arizona-based KTVK/KTVO on whether she intends to run for reelection at all.¹⁴

E. Some of the Expenditures Were Obviously Made in Connection to Senator Sinema's Personal Life, and the Respondents Exhibit a Pattern of Failing to Pro-Rate Sources of Funds as Required By Law

Senator Sinema has continued to avidly pursue her hobbies and other aspects of her personal and recreational life since being elected to the United States Senate. This in itself is obviously not a violation of the law. But she has an obligation to segregate her spending to ensure that her campaign and PAC funds are not disbursed for personal benefit.¹⁵

There is ample evidence that Senator Sinema scheduled some of her travel and her dining and entertainment activities not just for her convenience, but with the purpose of advancing personal recreational objectives unrelated to her duties either as a Senator or as a candidate for office—and paid for some of those activities using campaign and PAC funds. In some cases, she attached incidental campaign-related events to travel that was otherwise unrelated to her duties—and then appeared to pay for the entire trip with campaign funds.

“Tacking some personal activities on to a fundraising trip is generally going to be fine,” in the words of Brendan Fischer, deputy executive director of the watchdog group Documented. “But this appears to be the inverse—tacking fundraisers on to personal trips to justify the use of campaign funds to cover the costs.”¹⁶

This is unacceptable: campaign funds cannot be used for personal purposes, and a meal with a donor during a multi-day trip that otherwise serves personal ends does not magically transform the entire trip into a campaign activity. It is indisputable from all points of view—law, regulation, and ethics—that a candidate or officeholder who benefits both officially and personally from an expenditure must allocate that expenditure back to official and personal sources of funds in proportion to the benefits.

Complainant presents examples of Respondents’ violations in three categories: recreational sports competition, European travel, and her financial relationship with Vrindavan Gabbard Bellord.

Example 1. Senator Sinema Pursued Her Personal Hobby of Recreational Sports Competition Using Campaign Funds

Since her election, Senator Sinema has participated in at least 17 marathons, triathlons, and bicycle races, and has used both campaign and Senate funds to subsidize her trips and activities. Detailed below

¹⁴ Tyson Milanovich, “Arizona Senator Kyrsten Sinema mum on campaign spending, reelection plans,” <https://www.azfamily.com/2023/04/21/arizona-senator-sinema-mum-campaign-spending-reelection-plans/>, KTVK/KTVO Phoenix, April 21, 2023, accessed 4/24/2023

¹⁵ Senator Sinema has a separate obligation to ensure that *Senate* funds that have been entrusted to her in the name of the American people are not disbursed for her personal benefit. Ample evidence exists in her disclosures that she has violated this obligation, too, but her use of Senate funds is not within the purview of the Commission. It does, however, indicate a pattern of failure to pro-rate her sources of funds for Expenditures that provide both campaign and personal benefit, as discussed in Part E of Count I.

¹⁶ As quoted in Brodey, “How Kyrsten Sinema Uses Campaign Cash,” above

is one out of multiple examples of Senator Sinema's appropriating campaign funds for personal use with a general pattern of failing to pro-rate expenditures as required by law.

In one particularly egregious example, Senator Sinema made over \$9,000 in Expenditures of campaign funds in connection with a trip to Boston to participate in the Boston Marathon, in the process converting a large portion of that sum for personal use.

Senator Sinema ran in the Boston Marathon on April 18, 2022, according to contemporary press accounts and social media posts in her name.¹⁷ And during the trip, she stayed in the Ritz-Carlton Boston, a hotel in which room rates typically start around \$600¹⁸—and would be much higher during the Boston Marathon, one of the most high-demand hotel periods of the year in the city. A photo in one of her posts shows her and a companion wearing athletic gear inside the Ritz-Carlton Boston, alongside certificates and souvenir items displaying the Ritz-Carlton name and logo and memorabilia from the Boston Marathon, and in that month her campaign made a disbursement of \$8,470.73 to the Ritz-Carlton Hotel Company LLC.^{19 20}

On the same days in April, Respondent's disclosures also include PAC Expenditures in Boston of over \$1,500 for meals and "event supplies" (Trident Booksellers & Cafe, \$110.06; Fairmont Copley Plaza, \$175.52; Montien Thai Restaurant, \$380.00; Empire, \$850.17).²¹

Senator Sinema is so committed to competitive running that on multiple occasions she has prioritized it ahead of her official duties. Among other examples, she was absent from the Senate for a week in March 2019 to compete in a triathlon in New Zealand. During that week, she missed eight floor votes, including confirmation votes for the Director of the Environmental Protection Agency and a judge for the 9th Circuit U.S. Court of Appeals (which has jurisdiction over Arizona).^{22 23}

Conclusions from Example 1

While Respondents' disclosures do indicate that Senator Sinema raised funds from parties in Massachusetts during the month of April, given her pattern of marathon participation, common sense makes the following plain:

¹⁷ See her tweets and Instagram posts of 4/18/22 and 4/19/22 (accessed 2/2/2023 and 5/4/2023), e.g., <https://www.instagram.com/p/CcglpAYrO5e/>

¹⁸ From <https://www.marriott.com>, accessed 5/5/2023

¹⁹ Kyrsten Sinema (@kyrstensinema), Twitter, April 19, 2022; photo appears in Brodey, "How Kyrsten Sinema Uses Campaign Cash," above.

²⁰ FEC Disbursement Reports, accessed 1/24/2023, https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/045DA425BDC0_Screenshot_2023-02-02_at_5.47.22_PM.png

²¹ FEC Disbursement Reports, accessed 1/24/2023, https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/1FF8913AD158_Screenshot_2023-02-02_at_5.43.28_PM.png

²² Robin Bravender, "Sinema misses votes on judges, EPA chief during trip to New Zealand for Ironman race," AZ Mirror, March 5, 2019, <https://www.azmirror.com/2019/03/05/sinema-misses-votes-on-judges-epa-chief-during-trip-to-new-zealand-for-ironman-race/>, accessed 5/15/2023

²³ Respondents do not appear to have spent campaign or PAC funds to finance Senator Sinema's trip to New Zealand.

- Senator Sinema scheduled and took the trip primarily for the purpose of attending and participating in the Boston Marathon. Given the extent of physical preparation required to run a marathon and the extent to which competitive running is a personally important activity of Senator Sinema, in the words of Brendan Fischer, it is “highly unlikely that Sinema’s fundraising activity was scheduled as the priority.”²⁴ (We note that she also arranged her schedule for the purpose of attending the Boston Marathon in 2021, even though she was too injured to participate. She posted enthusiastically on social media about the experience, and her PAC disbursed over \$5,000 to a limousine company in connection with the event [Black Tie Limousine, Inc., 10/14/21]. ²⁵)
- Given the physical demands of running in a marathon, virtually all of Senator Sinema’s time while in Boston was occupied with preparing for, participating in, and recovering from the marathon.
- Senator Sinema appeared to cover the full cost of her hotel stay in Boston with the Committees’ campaign funds, even though only a small part of her time (if any) was dedicated to campaign purposes.

Thus, Respondents converted a large portion of the \$8,470.73 Ritz-Carlton Expenditure for personal use. They may also have converted some or all of the meals and “event supplies” disbursements for personal use. The extent of Respondents’ violations (the proportional allocation among sources of funds that Respondents did not make, but should have made) is a matter for the Commission to discover through investigation.

This is just one example of potential violations by Respondents that merit investigation by the Commission; there are at least five others. For instance:

- In the week of the Belgian Waffle Bike Race in Cedar City, Utah, in which Senator Sinema participated, her campaign committee disbursed \$223.81 to a pizzeria in the same city (Centre Woodfired Pizzeria, 9/28/22).²⁶ The campaign also disbursed \$318.90 to a bicycle shop in the area as part of a credit card payment that likely covered the same statement cycle in which the event occurred (LS Rapid Cycling, 11/18/22).²⁷ Even at the time, *The Salt Lake Tribune* noted that Republican-dominated Utah was “an odd choice for Sinema to prospect for campaign donations.”²⁸
- According to *The Daily Beast*, in August 2019, Senator Sinema participated in a race in Boulder, Colorado, which was followed by a payment of \$765 to a Denver-area vendor for “event catering.” In the preceding three months, she spent nearly \$7,000 in campaign and PAC

²⁴ Paraphrased by Brodey, “How Kyrsten Sinema Uses Campaign Cash,” above

²⁵ Nik DeCosta-Klipa, “Activists from Arizona traveled to the Boston Marathon to protest Kyrsten Sinema, who didn’t run,” Boston.com, <https://www.boston.com/news/politics/2021/10/12/kyrsten-sinema-boston-marathon/>, accessed 5/4/2023

²⁶ FEC Disbursement Reports, <https://docquery.fec.gov/cgi-bin/fecimg/?202210149532520789>, accessed 5/5/2023

²⁷ FEC Disbursement Reports, <https://docquery.fec.gov/cgi-bin/forms/C00508804/1685026/sb/17>, accessed 5/5/2023

²⁸ Bryan Schott, “Arizona Sen. Kyrsten Sinema is coming to SLC next week for a fundraiser,” *The Salt Lake Tribune*, August 24, 2022, <https://www.sltrib.com/news/politics/2022/08/24/arizona-sen-kyrsten-sinema-is/>, accessed 5/15/2023

funds on airfare. But the only funds she raised from Coloradans in that month were from three small-dollar online contributions.²⁹

In Appendix 2, Complainant enumerates specific examples of Expenditures of funds of the Committees by the Respondents that are likely to have been made in connection with sports competition events attended by Senator Sinema for personal benefit. To be clear: attaching incidental campaign meetings to a trip that was scheduled for the primary purpose of carrying out a personal hobby does not transform the entire trip into a legitimate campaign activity. Most of the Expenditures identified in Appendix 3 likely constitute instances of full or partial conversion of funds for personal use—and each of them merits investigation by the Commission.

As evidence of a pattern of behavior (the conversion of non-personal funds for personal use in connection with sports competition activities), also included are specific examples of disbursements of *Senate* funds by the Respondents for like purposes.

Example 2. Senator Sinema Undertook Extensive European Leisure Travel Using Campaign Funds

Since 2021, Respondents have disbursed more than \$20,000 in funds of the Committees on at least two trips to Europe, including Expenditures at high-end restaurants and luxury Parisian hotels. Key Expenditures in Europe are called out in Appendix 1.

The fact that Respondents reported spending more money in Europe on Senator Sinema’s 2022 trip than she concurrently raised from donors strongly suggests that her fundraising was a cover for travel undertaken for personal benefit. (On that trip, she spent at least \$13,872.53 in funds of the Committees, and generated \$12,900 in donations with a European address.)

Senator Sinema traveled with family and friends, bolstering the likelihood that her travel was undertaken for personal benefit. She was photographed in October 2022 shopping in Paris with her partner Lindsey Buckman³⁰ and her friends then-Representative Stephanie Murphy and then-Representative Kathleen Rice. The photograph, which was posted by the “serpentine_jewels” Instagram account, shows the parties posing on the street in front of a store, and the caption reads, “We met on the street and bonded over fashion. Cut to the next day—we ran into each other at a vintage store across town. Turns out a few of these fashion lovers are members of US Congress and knew about Serpentine Jewels!”³¹ The clear implication is that Senator Sinema and her friends spent at least two days of leisure time shopping and exploring together in Paris.

Murphy and Rice concurrently reported spending campaign funds at the same hotel (the Le Roch Hotel and Spa) as the Respondents, but they did not show any fundraising activity—and in fact, both had previously announced their retirements from Congress and were not active candidates for any other office. This suggests that *their* campaign-funded travel was recreational, and potentially actionable as

²⁹ Brodey, “How Kyrsten Sinema Uses Campaign Cash,” above

³⁰ The question of whether campaign funds were used to finance Buckman’s European travel is a matter for investigation by the Commission.

³¹ Instagram post, @serpentine_jewels, https://drive.google.com/file/d/1xT8zS9xI4SYj8qb8I3QlB8_qg4Y8MrL5/view?usp=share_link

a conversion of funds³²—and giving further credence to the premise that Senator Sinema, too, was enjoying a leisurely vacation during the time she spent with them.³³

About two months after the 2022 European trip, Murphy and Rice stated in an interview that they, along with Senator Sinema, “bought matching diamond-adorned thorn-shaped necklaces.”³⁴ As the three were shopping together in Paris shortly before, it is possible that they purchased these necklaces as part of a recreational excursion paid for by campaign funds.

Conclusions from Example 2

The totality of facts around Senator Sinema’s European trips support the following conclusions:

- Travel to Paris, Barcelona, and London is not an integral part of running for reelection to the United States Senate.
- A substantial purpose of Senator Sinema’s European travel was leisure: exploring Paris with her partner and her friends, visiting the French Riviera, shopping in boutiques, enjoying expensive meals.
- A significant portion of Senator Sinema’s time in Europe was spent in leisure activities.
- Respondents covered hotel nights and meals while Senator Sinema was in Europe with campaign funds, even on days in which she is known to have been spending her time recreationally with her friends.
- The 2022 trip was a financial loss, because Senator Sinema was occupied by activities other than fundraising.

Thus, Respondents converted a portion of Senator Sinema’s \$20,079.05 in European travel spending for personal use. The extent of her violation (the proportional allocation among sources of funds that she should have made, and did not) is properly a matter for the Commission to discover through investigation.

Example 3. Respondents Disbursed Over \$370,000 in Campaign Funds to Senator Sinema’s Friend Tulsi Gabbard’s Sister, Vrindavan Gabbard Bellord, and Subsidizes Her Extensive Recreational Travel

Tulsi Gabbard served as a United States Representative for Hawaii and ran for President in the 2020 Democratic primaries. Gabbard is a friend of Senator Sinema’s; they previously had a joint fundraising

³² Reps. Murphy and Rice are not subjects of this complaint, although it is our opinion that further investigation by the Commission is warranted. Reps. Murphy and Rice were not actively running for office at the time of these disbursements—each had announced her retirement—and thus had no legitimate reason to disburse donor funds on a trip to Europe, or anywhere else.

³³ Disclosures by Rep. Murphy’s campaign and PAC regarding her own expenditures shortly after the October 2022 trip (11/15/22) also raise the question of whether the actual cost of Senator Sinema’s travel may have been higher than she disclosed. Rep. Murphy made \$7,000.00 in in-kind contributions to Sinema for Arizona for in-kind travel (rail, airfare, and lodging). The fact that the total of her five contributions is a round number strongly suggests that this was an agreed-upon reimbursement, but for what, and why with campaign funds? This is a matter for further investigation by the Commission.

³⁴ Sarah Ferris, “Diamond-studded thorns,” *Politico*, <https://www.politico.com/news/2022/12/26/stephanie-murphy-kathleen-rice-centrists-00075509>, December 26, 2022, accessed 5/5/2023

committee together, the “Gabbard-Sinema Joint Victory Fund”³⁵, and Gabbard has publicly described Senator Sinema as a friend.³⁶

Vrindavan Gabbard Bellord (“Vrindavan Gabbard”) is the sister of Tulsi Gabbard. In October 2021, Senator Sinema’s U.S. Senate office hired Vrindavan Gabbard for the position of “Security Director,” making payments to her of \$53,374.86 in the subsequent 12-month period.³⁷

In December 2021, Vrindavan Gabbard formed a company called “TOA Group, LLC,” and Senator Sinema’s campaign began paying TOA Group for security services. TOA Group’s corporate filings show only one officer, “Vrindavan Bellord.”³⁸ Respondents made \$307,012.79 in Expenditures of campaign or PAC funds to TOA Group during 2022,³⁹ and another \$64,307.91 in the first quarter of 2023, representing more than half of the total security expenses of Senator Sinema’s campaign.⁴⁰

Notably, Senator Sinema’s campaign expenditures on security far surpass that of all other members of Congress save for Senator Raphael Warnock, who has had to compete in four general elections since 2020. And typically those candidates that have spent significantly on security have made much smaller payments to individuals—for instance, former law enforcement officers—and not lump-sum payments to a single firm. Other candidates also typically do not make separate payments for travel and meal expenses for “security detail.”⁴¹ Senator Sinema’s security expenses raise additional questions, since she has not hosted major rallies, public town hall meetings with constituents, or the types of large public events that typically generate high security costs during the years in question.

Vrindavan Gabbard, whose primary residence is in Texas,⁴² has shared numerous photographs on social media of traveling and hiking across the country in recreational settings, stating that the travel was for work—in other words, funded by Expenditures of campaign or PAC funds by Respondents. (According to her filings, the Committees have spent at least \$263,580.20 since the end of 2021 for travel for Senator Sinema’s security detail.)⁴³

³⁵ FEC Committee Filings, <https://www.fec.gov/data/committee/C00548222/?tab=filings>, accessed 5/5/2023

³⁶ See, for instance, her remarks at the CNN Town Hall on 10/22/21, e.g., Fox News, “Biden Takes Softball Questions at CNN Town Hall” (PDF), https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/051EC83C249C_Biden_Takes_Softball_Questions_At_CNN_Town_Hall.pdf

³⁷ U.S. Senate, *Report of the Secretary of the Senate*, accessed 1/30/2023

³⁸ Records of the Arizona Corporation Commission for Entity ID 23305578 (PDF), https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/B6E64043DECC_GetFilingDocuments_1.pdf

³⁹ FEC Disbursement Reports, accessed 1/30/23; summary report (Excel file) at https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/C107091926ED_Sinema_Security_Expenditures_230131.xlsx

⁴⁰ FEC Disbursement Reports, accessed 1/30/23; summary report (Excel file) at https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/97484A692506_Sinema_Security_Expenditures_230131_BMXBigg.xlsx

⁴¹ See Brodey, “How Kyrsten Sinema Uses Campaign Cash,” above. Brodey cites the example of Sen. Mark Kelly, the other senator from Senator Sinema’s home state of Arizona, who spent \$562,000 on security over two years.

⁴² Records of the Williams County, Texas tax assessor, accessed 1/30/23 (PNG image), https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/7F72DD68FC2D_Screen_Shot_2023-01-30_at_4.56.11_PM.png

⁴³ FEC Disbursement Reports, accessed 1/30/23, summary report (Excel file) at https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/3D36B13BF59E_Sinema_Security_Expenditures_230131_RbK3OFC.xlsx

There are multiple documented instances of extravagant recreational travel by Vrindavan Gabbard that are concurrent with the Respondents' Expenditures of campaign or PAC funds. For example:

- At the end of January 2022, Vrindavan Gabbard posted a photograph of herself biking on snow-capped mountains, which Senator Sinema "liked," with the caption "Fat biking and snowshoeing are my new faves. Thanks to our friend."⁴⁴ Around the same time a week later, Respondents made a credit card payment showing Expenditures of over \$250 classified as "event rental expense" at tour and equipment rental shops in Park City, Utah (White Pine Touring, \$95.96, 2/9/22; Aloha Ski and Snowboard, \$146.77, 2/9/22).⁴⁵ According to its website, White Pine Touring offers "Fat Bike Tours... tailor[ed] to your individual needs and experience level."⁴⁶
- In November 2022, Vrindavan Gabbard posted videos of her hiking in Park City, Phoenix, Sedona and Montana, saying she is "always traveling for work."⁴⁷

The unusual nature of this relationship has already attracted the attention of the investigative press, due to ethical concerns. When a person with a pre-existing personal relationship to a candidate is hired, at great expense, to provide services, says Ghosh, "it's always questionable whether someone is providing real, legitimate... services, or whether this is a sweetheart deal."⁴⁸ In the words of Fischer, "Using both campaign and taxpayer funds to pay tens of thousands of dollars to a close friend's sister—as well as a number of fringe benefits—warrants some degree of an explanation."⁴⁹

Conclusions from Example 3

The totality of facts around the Respondents' Expenditures of campaign and PAC funds for security services and security travel, and Vrindavan Gabbard's concurrent social media posts about her own travel, support the conclusion that the Expenditures have supported the travel and lifestyle of Vrindavan Gabbard, including extravagant recreational activities, in ways that are not related to the duties of a security officer or the stated purpose of the Respondents' disbursements to TOA Group LLC.

Thus, Respondents have converted a portion of the Expenditures of \$241,279.25 in security detail travel spending for the personal use of Vrindavan Gabbard, and possibly of Senator Sinema herself. And Respondents have converted a portion of other Expenditures in like manner, such as disbursements for fat bike tours that were classified as "event rental expense." The extent of

⁴⁴ Instagram, @vrindavan, https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/E7293F99F06B_Screen_Shot_2023-01-31_at_6.54.25_PM.png, accessed 1/31/2023

⁴⁵ FEC, Disbursements, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00571182&recipient_name=aloha&recipient_name=white+pine&two_year_transaction_period=2022&min_date=01%2F01%2F2021&max_date=12%2F31%2F2022, accessed 5/5/2023

⁴⁶ <https://whitepinetouring.com/fat-biking-tour.php>, accessed 5/5/2023

⁴⁷ Instagram, @vrindavan, https://s3.us-east-1.amazonaws.com/tappan-media-1/file_uploads/0F270140/8D1989AA3757_Screen_Shot_2023-01-31_at_11.34.33_AM.png, accessed 11/24/2022

⁴⁸ Brodey, "Kyrsten Sinema's \$300,000 Security Expert," above

⁴⁹ Brodey, "Kyrsten Sinema's \$300,000 Security Expert," above

Respondents' violations (the proportional allocation among sources of funds that Respondents did not make, but should have made) is a matter for the Commission to discover through investigation.

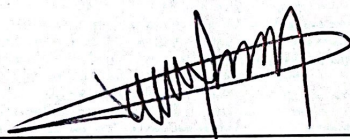
COUNT II:
The Committees Filed Knowingly False Disclosure Reports with the Federal Election Commission

Federal law and regulations require political committees to maintain accurate financial records and file timely disclosure reports. 52 U.S.C. §§ 30102, 30104; 11 C.F.R. §§ 102.9(b)(2), 104.1. "Any person," including the candidate, can be held liable for failing to comply with these obligations. 52 U.S.C. § 30109. Upon information and belief, the Committees knowingly violated their disclosure obligations in violation of the above-cited federal law and regulations.

Thus, if the Commission finds Respondents committed the campaign finance violations detailed in Count I, it follows that the Committees made representations about those Expenditures in their disclosure reports to the Commission that were knowingly false, and that Count II must be upheld. If the Commission finds Senator Sinema herself knew and directed such false reporting, the Commission should take appropriate action.

REQUEST FOR ACTION

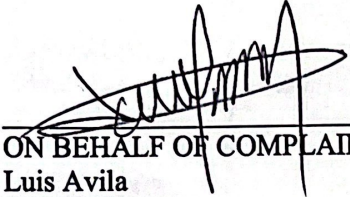
Change for Arizona 2024 PAC respectfully requests that the Commission initiate a formal investigation of the Complaint's allegations, find that Respondents violated the Federal Election Campaign Act and related federal regulations, and impose appropriate sanctions to remedy the violations.



ON BEHALF OF COMPLAINANT
Luis Avila
Senior Advisor
Change for Arizona 2024 PAC
Post Office Box 97241
Phoenix, Arizona 85060

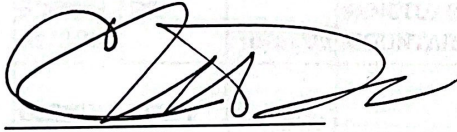
VERIFICATION

Change for Arizona 2024 PAC swears under penalty of perjury that all the facts alleged in the Complaint are, upon information and belief, true and correct.

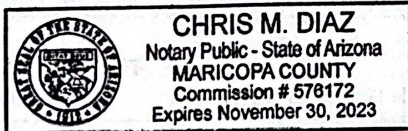


ON BEHALF OF COMPLAINANT
Luis Avila
Senior Advisor
Change for Arizona 2024 PAC
Post Office Box 97241
Phoenix, Arizona 85060

Signed and sworn to before me on this 18 day of May, 2023.



Notary Public



APPENDIX 1. EXPENDITURES BY CATEGORY

These line items can be found in Respondents' FEC Disbursement Reports for the applicable dates.

Luxury Hotel and Resort Expenditures

Source	Date	Payee	Description	Amount	Notes
SINEMA FOR ARIZONA	11/18/22	SANCTUARY CAMELBACK MOUNTAIN	EVENT CATERING & FACILITY RENTAL	\$210.23	Regularly In Travel + Leisure's List Of World's Best Hotels
SINEMA FOR ARIZONA	10/28/22	ROSEWOOD SAND HILL	LODGING	\$1,172.84	5 star hotel considered one of the top resorts in CA
SINEMA FOR ARIZONA	10/28/22	ROSEWOOD SAND HILL	MEETING MEAL EXPENSE	\$71.54	5 star hotel considered one of the top resorts in CA
SINEMA FOR ARIZONA	10/21/22	SANCTUARY CAMELBACK MOUNTAIN	EVENT CATERING & FACILITY RENTAL	\$1,163.59	Regularly In Travel + Leisure's List Of World's Best Hotels
GETTING STUFF DONE PAC	10/19/22	HOTEL LANCASTER	LODGING	\$794.74	Member of "The Leading Hotels Of The World"
GETTING STUFF DONE PAC	10/12/22	LE ROCH HOTEL & SPA	LODGING	\$2,799.77	Included in the Five Star Alliance
GETTING STUFF DONE PAC	7/18/22	LE ROCH HOTEL & SPA	LODGING OVERCHARGE REFUND	-\$147.28	Included in the Five Star Alliance
GETTING STUFF DONE PAC	4/19/22	FAIRMONT COPLEY PLAZA	MEETING MEAL EXPENSE	\$175.52	Forbes Travel Guide 2022 Recommended
SINEMA FOR ARIZONA	4/5/22	ROSEWOOD SAND HILL	LODGING	\$1,121.54	5 star hotel considered one of the top resorts in CA
SINEMA FOR ARIZONA	2/28/22	TUBAC GOLF RESORT & SPA	LODGING	\$818.68	AAA Four Diamond Award recipient
SINEMA FOR ARIZONA	2/28/22	TUBAC GOLF RESORT & SPA	LODGING	\$818.68	AAA Four Diamond Award recipient
GETTING STUFF DONE PAC	12/10/21	ANDAZ	EVENT CATERING	\$1,251.23	U.S. News listed as a 4.5 star resort

GETTING STUFF DONE PAC	11/23/21	L'AUBERGE DE SEDONA	LODGING	\$2,205.10	2022 Forbes verified luxury retreat
GETTING STUFF DONE PAC	11/8/21	DOMINO ROOM AT CAFE ROYAL	MEETING MEAL EXPENSE	\$287.46	Elegant restaurant within legendary London hotel
SINEMA FOR ARIZONA	10/22/21	W HOTELS WORLDWIDE	LODGING	\$2,474.63	U.S. News lists W Hotels among the best in the world
GETTING STUFF DONE PAC	10/18/21	LE ROCH HOTEL & SPA	LODGING	\$1,175.21	Included in the Five Star Alliance
GETTING STUFF DONE PAC	10/18/21	LE ROCH HOTEL & SPA	LODGING	\$1,418.89	Included in the Five Star Alliance
GETTING STUFF DONE PAC	10/13/21	LE ROCH HOTEL & SPA	LODGING	\$190.87	Included in the Five Star Alliance
SINEMA FOR ARIZONA	9/27/21	THE RITZ-CARLTON HOTEL COMPANY LLC	LODGING	\$1,723.66	Ritz-Carlton Hotels are listed in the Five Star Alliance
SINEMA FOR ARIZONA	9/27/21	W HOTELS WORLDWIDE	LODGING	\$452.17	U.S. News lists W Hotels among the best in the world
SINEMA FOR ARIZONA	9/15/21	THE RITZ-CARLTON HOTEL COMPANY LLC	LODGING	\$234.79	Ritz-Carlton Hotels are listed in the Five Star Alliance
SINEMA FOR ARIZONA	9/15/21	THE RITZ-CARLTON HOTEL COMPANY LLC	LODGING	\$609.75	Ritz-Carlton Hotels are listed in the Five Star Alliance
SINEMA FOR ARIZONA	8/12/21	ROSEWOOD SAND HILL	LODGING	\$1,035.01	5 star hotel considered one of the top resorts in CA
SINEMA FOR ARIZONA	8/12/21	ROSEWOOD SAND HILL	LODGING	\$52.34	5 star hotel considered one of the top resorts in CA
GETTING STUFF DONE PAC	1/6/21	ST. REGIS DEER VALLEY	LODGING	\$137.72	Luxury Travel Magazine listed as a 5 star luxury resort
GETTING STUFF DONE PAC	4/13/20	W HOTELS WORLDWIDE	LODGING	\$330.96	U.S. News lists W Hotels among the best in the world
GETTING STUFF DONE PAC	4/13/20	W HOTELS WORLDWIDE	LODGING	\$383.14	U.S. News lists W Hotels among the

					best in the world
GETTING STUFF DONE PAC	4/13/20	ST. REGIS DEER VALLEY	LODGING	\$67.98	Luxury Travel Magazine listed as a 5 star luxury resort
SINEMA FOR ARIZONA	3/8/20	W HOTELS WORLDWIDE	LODGING	\$581.84	U.S. News lists W Hotels among the best in the world
SINEMA FOR ARIZONA	3/8/20	WYNN LAS VEGAS	LODGING	\$958.82	Forbes Travel 5 star for lodging, dining, and spa
SINEMA FOR ARIZONA	3/8/20	W HOTELS WORLDWIDE	LODGING	\$22.87	U.S. News lists W Hotels among the best in the world
SINEMA FOR ARIZONA	3/4/20	W HOTELS WORLDWIDE	LODGING	\$330.96	U.S. News lists W Hotels among the best in the world
SINEMA FOR ARIZONA	3/4/20	WYNN LAS VEGAS	LODGING	\$429.71	Forbes Travel 5 star for lodging, dining, and spa
SINEMA FOR ARIZONA	1/24/20	W HOTELS WORLDWIDE	LODGING	\$383.14	U.S. News lists W Hotels among the best in the world
SINEMA FOR ARIZONA	1/24/20	VAIL RESORTS	LODGING	\$319.70	Premier ski resorts
SINEMA FOR ARIZONA	12/12/19	HOTEL PASEO	LODGING	\$797.65	4 star AAA Diamond Rating
SINEMA FOR ARIZONA	12/5/19	W HOTELS WORLDWIDE	LODGING	\$69.33	U.S. News lists W Hotels among the best in the world
SINEMA FOR ARIZONA	11/14/19	W HOTELS WORLDWIDE	LODGING	\$447.59	U.S. News lists W Hotels among the best in the world
SINEMA FOR ARIZONA	11/8/19	W HOTELS WORLDWIDE	LODGING	\$503.82	U.S. News lists W Hotels among the best in the world
GETTING STUFF DONE PAC	10/29/19	L'AUBERGE DE SEDONA	LODGING	\$1,001.73	2022 Forbes verified luxury retreat
SINEMA FOR ARIZONA	10/9/19	W HOTELS WORLDWIDE	LODGING	\$557.55	U.S. News lists W Hotels among the best in the world
SINEMA FOR ARIZONA	10/9/19	WESTIN	LODGING	\$248.91	4 star rated
SINEMA FOR ARIZONA	9/25/19	W HOTELS WORLDWIDE	LODGING	\$429.24	U.S. News lists W Hotels among the

					best in the world
GETTING STUFF DONE PAC	9/2/19	WESTIN	LODGING	\$446.56	4 star rated
GETTING STUFF DONE PAC	8/7/19	WESTIN	LODGING	\$337.09	4 star rated
SINEMA FOR ARIZONA	7/31/19	WESTIN	LODGING	\$193.93	4 star rated
SINEMA FOR ARIZONA	6/10/19	WESTIN	LODGING	\$911.16	4 star rated
SINEMA FOR ARIZONA	6/5/19	W HOTELS WORLDWIDE	LODGING	\$2,128.53	U.S. News lists W Hotels among the best in the world
SINEMA FOR ARIZONA	5/13/19	WESTIN	LODGING	\$537.72	4 star rated
SINEMA FOR ARIZONA	3/29/19	WESTIN	LODGING	\$219.54	4 star rated
SINEMA FOR ARIZONA	2/26/19	W HOTELS WORLDWIDE	LODGING	\$314.13	U.S. News lists W Hotels among the best in the world
SINEMA FOR ARIZONA	2/4/19	WALDORF ASTORIA PARK CITY	LODGING	\$500.00	Luxury Travel Magazine listed as a 5 star luxury resort
Total				\$35,702.28	

Wine and Alcohol Expenditures

Source Of Payment	Date	Payee	Description	Amount
GETTING STUFF DONE PAC (GSD-PAC)	12/09/22	ARGYLE WINERY	EVENT CATERING	\$138.47
GETTING STUFF DONE PAC (GSD-PAC)	11/18/22	ARGYLE WINERY	EVENT CATERING	\$138.47
GETTING STUFF DONE PAC (GSD-PAC)	11/18/22	ARGYLE WINERY	EVENT CATERING	\$166.16
GETTING STUFF DONE PAC (GSD-PAC)	11/18/22	REEVE WINES	EVENT CATERING	\$424.00
GETTING STUFF DONE PAC (GSD-PAC)	10/26/22	THREE STICKS WINES	EVENT CATERING	\$450.00
GETTING STUFF DONE PAC (GSD-PAC)	10/17/22	THE DONUM ESTATE	EVENT CATERING	\$650.78
GETTING STUFF DONE PAC (GSD-PAC)	10/4/22	B WISE VINEYARDS	EVENT CATERING	\$447.28
GETTING STUFF DONE PAC (GSD-PAC)	9/28/22	AYOUB WINES	EVENT CATERING	\$778.77

GETTING STUFF DONE PAC (GSD-PAC)	9/23/22	ARGYLE WINERY	EVENT CATERING	\$420.01
GETTING STUFF DONE PAC (GSD-PAC)	9/23/22	REEVE WINES	EVENT CATERING	\$353.80
GETTING STUFF DONE PAC (GSD-PAC)	9/6/22	ARGYLE WINERY	EVENT CATERING	\$439.83
GETTING STUFF DONE PAC (GSD-PAC)	8/17/22	PROMONTORY	EVENT CATERING	\$1,123.81
SINEMA FOR ARIZONA	8/17/22	THREE STICKS WINES	EVENT CATERING	\$327.00
GETTING STUFF DONE PAC (GSD-PAC)	5/18/22	REEVE WINES	EVENT CATERING	\$134.34
GETTING STUFF DONE PAC (GSD-PAC)	4/6/22	THREE STICKS WINES	EVENT CATERING	\$1,090.00
GETTING STUFF DONE PAC (GSD-PAC)	4/6/22	WILLIAMS SELYEM WINERY	EVENT CATERING	\$298.38
GETTING STUFF DONE PAC (GSD-PAC)	2/9/22	ETO WINE	EVENT CATERING SUPPLIES	\$204.50
GETTING STUFF DONE PAC (GSD-PAC)	1/7/22	DRIZLY INC.	EVENT CATERING	\$97.21
GETTING STUFF DONE PAC (GSD-PAC)	12/21/21	AUDEANT WINES	EVENT CATERING	\$496.60
GETTING STUFF DONE PAC (GSD-PAC)	12/10/21	ARGYLE WINERY	EVENT CATERING	\$204.00
GETTING STUFF DONE PAC (GSD-PAC)	12/10/21	ARGYLE WINERY	EVENT CATERING	\$204.00
GETTING STUFF DONE PAC (GSD-PAC)	11/23/21	THREE STICKS WINES	EVENT CATERING	\$344.00
GETTING STUFF DONE PAC (GSD-PAC)	9/8/21	ARISTA WINERY	EVENT CATERING	\$180.00
GETTING STUFF DONE PAC (GSD-PAC)	9/8/21	WILLIAMS SELYEM WINERY	EVENT CATERING	\$24.59
SINEMA FOR ARIZONA	8/12/21	THREE STICKS WINES	MEETING EXPENSES	\$1,180.00
GETTING STUFF DONE PAC (GSD-PAC)	8/10/21	LYNMAR ESTATE WINERY	EVENT CATERING	\$390.60
GETTING STUFF DONE PAC (GSD-PAC)	8/2/21	ARISTA WINERY	EVENT CATERING	\$368.90
GETTING STUFF DONE PAC (GSD-PAC)	8/2/21	AUTEUR WINES	EVENT CATERING	\$474.15
GETTING STUFF DONE PAC (GSD-PAC)	8/2/21	CIRQ ESTATE	EVENT CATERING	\$346.80
GETTING STUFF DONE PAC (GSD-PAC)	8/2/21	THE DONUM ESTATE	EVENT CATERING	\$182.33
GETTING STUFF DONE PAC (GSD-PAC)	8/2/21	WILLIAMS SELYEM WINERY	EVENT CATERING	\$645.58
GETTING STUFF DONE PAC (GSD-PAC)	5/21/21	J VINEYARDS & WINERY	EVENT CATERING	\$283.88
GETTING STUFF DONE PAC (GSD-PAC)	5/21/21	J VINEYARDS & WINERY	EVENT CATERING	\$308.16

GETTING STUFF DONE PAC (GSD-PAC)	5/18/21	THREE STICKS WINES	EVENT CATERING	\$293.22
GETTING STUFF DONE PAC (GSD-PAC)	5/18/21	THREE STICKS WINES	EVENT CATERING	\$1,080.00
GETTING STUFF DONE PAC (GSD-PAC)	5/6/21	VALLEY WINE MERCHANT LLC	EVENT CATERING	\$4,633.00
Total				\$19,322.62

Expensive Restaurants Expenditures

Source Of Payment	Date	Payee	Description	Amount	Notes
GETTING STUFF DONE PAC	12/07/22	RUSSIAN TEA ROOM	MEETING MEAL EXPENSE	\$526.86	Expensive NY tea room founded by the Russian Imperial Ballet
GETTING STUFF DONE PAC	12/07/22	PLANTA	MEETING MEAL EXPENSE	\$556.54	Upscale vegan restaurant
GETTING STUFF DONE PAC	10/26/22	LES REMPARTS	MEETING MEAL EXPENSE	\$187.58	Michelin Guide recommended French restaurant
GETTING STUFF DONE PAC	8/29/22	ATEMPO RESTAURANT	MEETING MEAL EXPENSE	\$1,021.66	Michelin Star restaurant in Barcelona
SINEMA FOR ARIZONA	6/6/22	CIVICO	TRAVEL MEALS	\$201.77	Farm to table upscale Italian restaurant with vegan menu
SINEMA FOR ARIZONA	6/6/22	CIVICO	TRAVEL MEALS	\$213.73	Farm to table upscale Italian restaurant with vegan menu
GETTING STUFF DONE PAC	4/6/22	DRY CREEK KITCHEN	EVENT CATERING	\$1,810.53	Michelin Guide recommended upscale restaurant
SINEMA FOR ARIZONA	2/28/22	CIVICO	MEETING MEAL EXPENSE	\$208.22	Farm to table upscale Italian restaurant with vegan menu
GETTING STUFF DONE PAC	12/21/21	AZABU MIAMI BEACH	MEETING MEAL EXPENSE	\$770.08	Michelin Star Miami restaurant
SINEMA FOR ARIZONA	12/13/21	PLANTA	MEETING MEAL EXPENSE	\$291.65	Upscale vegan restaurant
GETTING STUFF DONE PAC	10/18/21	SKETCH	EVENT CATERING	\$985.60	Three Michelin star tea room in London
GETTING STUFF DONE PAC	10/18/21	BUDDHA-BAR	EVENT CATERING	\$325.82	Pricey Parisian bar and restaurant
GETTING STUFF DONE	10/13/21	PIED A TERRE	EVENT	\$1,228.49	Michelin Star London

PAC			CATERING		restaurant
GETTING STUFF DONE PAC	10/13/21	DAVIO'S CATERING	EVENT CATERING	\$1,447.64	Upscale steakhouse
Total				\$9,776.17	

Car Service and Limousine Expenditures

Source Of Payment	Date	Payee	Description	Amount	Notes
GETTING STUFF DONE PAC	12/14/22	ATTITUDE NEW YORK	CAR SERVICE	\$945.48	Chauffeur service targeting C-Suite execs and celebrities
SINEMA LEADERSHIP FUND	12/09/22	CRAWFORD CARS LTD	CAR SERVICE	\$2,481.24	Luxury chauffeur service
GETTING STUFF DONE PAC	12/07/22	ATTITUDE NEW YORK	CAR SERVICE	\$4,672.25	Chauffeur service targeting C-Suite execs and celebrities
SINEMA FOR ARIZONA	10/21/22	ATTITUDE NEW YORK	CAR SERVICE	\$4,286.56	Chauffeur service targeting C-Suite execs and celebrities
GETTING STUFF DONE PAC	8/5/22	CRAWFORD CARS LTD	CAR SERVICE	\$1,499.22	Luxury chauffeur service
GETTING STUFF DONE PAC	7/18/22	CRAWFORD CARS LTD	CAR SERVICE	\$552.57	Luxury chauffeur service
GETTING STUFF DONE PAC	6/12/22	ATTITUDE NEW YORK	CAR SERVICE	\$1,245.12	Chauffeur service targeting C-Suite execs and celebrities
GETTING STUFF DONE PAC	5/26/22	ATTITUDE NEW YORK	CAR SERVICE	\$4,793.39	Chauffeur service targeting C-Suite execs and celebrities
SINEMA FOR ARIZONA	4/14/22	PRIME LIMO & CAR SERVICE	CAR SERVICE	\$106.80	Exclusive limo and black car service
SINEMA FOR ARIZONA	4/14/22	PRIME LIMO & CAR SERVICE	CAR SERVICE	\$121.20	Exclusive limo and black car service
SINEMA FOR ARIZONA	4/14/22	PRIME LIMO & CAR SERVICE	CAR SERVICE	\$480.00	Exclusive limo and black car service
GETTING STUFF DONE PAC	3/17/22	UNITY TRANSPORTATION	CAR SERVICE	\$180.00	Limo and luxury vehicle chauffeur

					service
GETTING STUFF DONE PAC	3/17/22	AFORMAL LIMOUSINE & SHUTTLE SERVICE	CAR SERVICE	\$789.60	Limo and luxury vehicle chauffeur airport service
SINEMA FOR ARIZONA	3/15/22	ATTITUDE NEW YORK	CAR SERVICE	\$1,826.08	Chauffeur service targeting C-Suite execs and celebrities
SINEMA FOR ARIZONA	2/28/22	ATTITUDE NEW YORK	CAR SERVICE	\$544.02	Chauffeur service targeting C-Suite execs and celebrities
GETTING STUFF DONE PAC	12/21/21	A1A AIRPORT & LIMOUSINE	CAR SERVICE	\$110.50	Limo and black car transportation service
GETTING STUFF DONE PAC	12/21/21	A1A AIRPORT & LIMOUSINE	CAR SERVICE	\$331.50	Limo and black car transportation service
SINEMA FOR ARIZONA	12/18/21	A1A AIRPORT & LIMOUSINE	CAR SERVICE	\$463.12	Limo and black car transportation service
SINEMA FOR ARIZONA	12/18/21	A1A AIRPORT & LIMOUSINE	CAR SERVICE	\$988.00	Limo and black car transportation service
SINEMA FOR ARIZONA	12/18/21	ATTITUDE NEW YORK	CAR SERVICE	\$1,651.07	Chauffeur service targeting C-Suite execs and celebrities
SINEMA FOR ARIZONA	11/10/21	ATTITUDE NEW YORK	CAR SERVICE	\$1,935.50	Chauffeur service targeting C-Suite execs and celebrities
GETTING STUFF DONE PAC	11/8/21	CRAWFORD CARS LTD	CAR SERVICE	\$387.05	Luxury chauffeur service
SINEMA FOR ARIZONA	10/14/21	BLACK TIE LIMOUSINE, INC.	CAR SERVICE	\$1,232.00	Limo and black car service
SINEMA FOR ARIZONA	10/14/21	BLACK TIE LIMOUSINE, INC.	CAR SERVICE	\$1,260.00	Limo and black car service
SINEMA FOR ARIZONA	10/14/21	BLACK TIE LIMOUSINE, INC.	CAR SERVICE	\$1,296.55	Limo and black car service
SINEMA FOR ARIZONA	10/14/21	BLACK TIE LIMOUSINE, INC.	CAR SERVICE	\$1,540.00	Limo and black car service
SINEMA FOR ARIZONA	10/1/21	ATTITUDE NEW YORK	CAR SERVICE	\$234.72	Chauffeur service targeting C-Suite execs and celebrities

SINEMA FOR ARIZONA	10/1/21	ATTITUDE NEW YORK	CAR SERVICE	\$723.17	Chauffeur service targeting C-Suite execs and celebrities
SINEMA FOR ARIZONA	9/27/21	CAREY INTERNATIONAL, INC.	CAR SERVICE	\$392.70	Virtuoso preferred chauffeur service
SINEMA FOR ARIZONA	7/12/21	ATTITUDE NEW YORK	CAR SERVICE	\$549.19	Chauffeur service targeting C-Suite execs and celebrities
SINEMA FOR ARIZONA	6/23/21	ATTITUDE NEW YORK	CAR SERVICE	\$538.30	Chauffeur service targeting C-Suite execs and celebrities
GETTING STUFF DONE PAC	4/13/20	ATTITUDE NEW YORK	CAR SERVICE	\$1,026.92	Chauffeur service targeting C-Suite execs and celebrities
GETTING STUFF DONE PAC	4/13/20	ATTITUDE NEW YORK	CAR SERVICE	\$598.54	Chauffeur service targeting C-Suite execs and celebrities
SINEMA FOR ARIZONA	3/8/20	ATTITUDE NEW YORK	TRANSPORTATION	\$1,026.92	Chauffeur service targeting C-Suite execs and celebrities
SINEMA FOR ARIZONA	3/8/20	ATTITUDE NEW YORK	TRANSPORTATION	\$242.52	Chauffeur service targeting C-Suite execs and celebrities
SINEMA FOR ARIZONA	3/4/20	ATTITUDE NEW YORK	TRANSPORTATION	\$598.54	Chauffeur service targeting C-Suite execs and celebrities
SINEMA FOR ARIZONA	3/4/20	GROUNDLINK HOLDINGS LLC	TRANSPORTATION	\$81.25	Private chauffeur service
SINEMA FOR ARIZONA	3/4/20	ATTITUDE NEW YORK	TRANSPORTATION	\$281.34	Chauffeur service targeting C-Suite execs and celebrities
SINEMA FOR ARIZONA	2/19/20	ATTITUDE NEW YORK	TRANSPORTATION	\$1,251.86	Chauffeur service targeting C-Suite execs and celebrities
SINEMA FOR ARIZONA	11/14/19	GROUNDLINK HOLDINGS LLC	TRANSPORTATION	\$96.90	Private chauffeur service
SINEMA FOR ARIZONA	11/14/19	GROUNDLINK HOLDINGS LLC	TRANSPORTATION	\$550.73	Private chauffeur service

SINEMA FOR ARIZONA	11/8/19	GROUNDLINK HOLDINGS LLC	TRANSPORTATION	\$214.19	Private chauffeur service
SINEMA FOR ARIZONA	11/8/19	GROUNDLINK HOLDINGS LLC	TRANSPORTATION	\$402.76	Private chauffeur service
SINEMA FOR ARIZONA	10/9/19	GROUNDLINK HOLDINGS LLC	TRANSPORTATION	\$418.71	Private chauffeur service
SINEMA FOR ARIZONA	10/9/19	GROUNDLINK HOLDINGS LLC	TRANSPORTATION	\$448.35	Private chauffeur service
SINEMA FOR ARIZONA	10/9/19	GROUNDLINK HOLDINGS LLC	TRANSPORTATION	\$106.12	Private chauffeur service
Total				\$45,502.55	

Charter Flight Expenditures

Source Of Payment	Date	Payee	Description	Amount
SENATE OFFICE (SINEMA)	8/8/22 -8/9/22	SOUTHWEST AIRCRAFT CHARTER	SENATOR AND STAFF TRANSPORTATION	\$23,070.00
SENATE OFFICE (SINEMA)	5/6/22	SOUTHWEST AIRCRAFT CHARTER	SENATOR AND STAFF TRANSPORTATION	\$9,503.00
SENATE OFFICE (SINEMA)	4/11/22	SOUTHWEST AIRCRAFT CHARTER	SENATOR AND STAFF TRANSPORTATION	\$8,982.00
SENATE OFFICE (SINEMA)	2/22/22-2/23/22	MONARCH AIR GROUP LLC	SENATOR AND STAFF TRANSPORTATION	\$6,950.00
SENATE OFFICE (SINEMA)	11/9/21	SOUTHWEST AIRCRAFT CHARTER	SENATOR AND STAFF TRANSPORTATION	\$6,934.00
GETTING STUFF DONE PAC	11/5/21	NEXTERA ENERGY	AIR TRAVEL	\$1,430.00
GETTING STUFF DONE PAC	11/4/21	NEXTERA ENERGY	AIR TRAVEL	\$493.40
GETTING STUFF DONE PAC	10/8/21	LUPA INVESTMENT MANAGEMENT	AIR TRAVEL	\$526.00
GETTING STUFF DONE PAC	10/8/21	GULF COAST AVIATION	AIR TRAVEL	\$678.00
SENATE OFFICE (SINEMA)	8/23/21 - 8/24/21	SOUTHWEST AIRCRAFT CHARTER	SENATOR AND STAFF TRANSPORTATION	\$11,997.00
Total				\$70,563.40

APPENDIX 2. EXPENDITURES OF CAMPAIGN, PAC, AND SENATE FUNDS BY THE RESPONDENT IN CONNECTION WITH HER SPORTS COMPETITION ACTIVITIES

Sports Competition Events In Connection to Which the Respondent Disbursed Campaign, PAC, or Senate Funds

Race Name	Date	Campaign Funds spent	Notes
Boston Marathon	4/18/22	\$9,986.48	\$8,400 in expenses on a stay at the Ritz-Carlton
Boston Marathon	10/11/21	\$6,776.19	Expenses were for catering and car services
Belgian Waffle Ride	9/24/22	\$542.71	Expenses were for a meal and bicycle rental
Mountains2Beach	5/25/19	\$400	Expense was for a cleaning service
Big Cottonwood Marathon	9/10/22	\$293.19	Expenses were for travel meals
IRONMAN Boulder 70.3	8/3/19	\$765	Expense was for catering, despite having no scheduled campaign events
Mountain Man	7/14/19	\$60	Expense was for a car rental Respondent traveled between AZ and D.C. using Senate office funds
Light At The End Of The Tunnel	6/13/21	\$0	
Ironman New Zealand	3/2/19	\$0	
Puerto Rico 70.3	3/17/19	\$0	
ACLI Capital Challenge	5/12/22	\$0	Race was held in D.C.
Mesa Marathon	2/8/20	\$0	Respondent traveled between AZ and D.C. using Senate office funds
Ironman Arizona	11/26/19	\$0	Respondent traveled between AZ and D.C. using Senate office funds
Mesa Marathon	2/9/19	\$0	Respondent traveled between AZ and D.C. using Senate office funds
Rock N Roll Marathon	1/20/19	\$0	Respondent traveled between AZ and D.C. using Senate office funds
ACLI Capital Challenge	05/15/19	\$0	Race was held in D.C.
Mesa Marathon	2/4/23	N/A	Campaign disclosure filings not yet available

APPENDIX 3. EXPENDITURES OF CAMPAIGN, PAC, AND SENATE FUNDS BY THE RESPONDENT IN CONNECTION WITH HER EUROPEAN TRAVEL

Source Of Payment	Date	Payee	Description	Amount
GETTING STUFF DONE PAC (GSD-PAC)	10/13/21	LE ROCH HOTEL & SPA	LODGING	\$190.87
GETTING STUFF DONE PAC (GSD-PAC)	10/13/21	PIED A TERRE	EVENT CATERING	\$1,228.49
GETTING STUFF DONE PAC (GSD-PAC)	10/18/21	ANCHORA ST HONOR	EVENT CATERING	\$150.65
GETTING STUFF DONE PAC (GSD-PAC)	10/18/21	BUDDHA-BAR	EVENT CATERING	\$325.82
GETTING STUFF DONE PAC (GSD-PAC)	10/18/21	LE ROCH HOTEL & SPA	LODGING	\$1,175.21
GETTING STUFF DONE PAC (GSD-PAC)	10/18/21	LE ROCH HOTEL & SPA	LODGING	\$1,418.89
GETTING STUFF DONE PAC (GSD-PAC)	10/18/21	SKETCH	EVENT CATERING	\$985.60
GETTING STUFF DONE PAC (GSD-PAC)	11/8/21	CRAWFORD CARS LTD	CAR SERVICE	\$387.05
GETTING STUFF DONE PAC (GSD-PAC)	11/8/21	DOMINO ROOM AT CAFE ROYAL	MEETING MEAL EXPENSE	\$287.46
GETTING STUFF DONE PAC (GSD-PAC)	11/8/21	SLUG AND LETTUCE	MEETING MEAL EXPENSE	\$56.48
GETTING STUFF DONE PAC (GSD-PAC)	7/7/22	EUROSTAR INTERNATIONAL LTD	TRAIN FARE	\$404.00
GETTING STUFF DONE PAC (GSD-PAC)	7/7/22	RAIL EUROPE	TRAIN FARE	\$241.95
GETTING STUFF DONE PAC (GSD-PAC)	7/9/22	LE ROCH HOTEL & SPA	LODGING	\$5,738.40
GETTING STUFF DONE PAC (GSD-PAC)	7/18/22	CRAWFORD CARS LTD	CAR SERVICE	\$552.57
GETTING STUFF DONE PAC (GSD-PAC)	7/18/22	LE ROCH HOTEL & SPA	LODGING OVERCHARGE REFUND	-\$147.28
GETTING STUFF DONE PAC (GSD-PAC)	8/5/22	CRAWFORD CARS LTD	CAR SERVICE	\$1,499.22
GETTING STUFF DONE PAC (GSD-PAC)	8/29/22	ATEMPO RESTAURANT	MEETING MEAL EXPENSE	\$1,021.66
GETTING STUFF DONE PAC (GSD-PAC)	9/23/22	EUROSTAR INTERNATIONAL LTD	TRAIN FARE	\$368.00
GETTING STUFF DONE PAC (GSD-PAC)	10/4/22	EUROSTAR INTERNATIONAL LTD	TRAINFARE	\$368.00
GETTING STUFF DONE PAC (GSD-PAC)	10/12/22	LE ROCH HOTEL & SPA	LODGING	\$2,799.77
GETTING STUFF DONE PAC (GSD-PAC)	10/19/22	HOTEL LANCASTER	LODGING	\$794.74

GETTING STUFF DONE PAC (GSD-PAC)	10/19/22	THE LONDON CAB COMPANY LTD	TAXI	\$23.29
GETTING STUFF DONE PAC (GSD-PAC)	10/19/22	THE LONDON CAB COMPANY LTD	TAXI	\$20.63
GETTING STUFF DONE PAC (GSD-PAC)	10/26/22	LES REMPARTS	MEETING MEAL EXPENSE	\$187.58
Total				\$20,079.05