

FEDERAL ELECTION COMMISSION

In the matter of:

MUR \_\_\_\_

Kyrsten Sinema  
Sinema for Arizona

COMPLAINT

1. Citizens for Responsibility and Ethics in Washington (“CREW”) brings this complaint before the Federal Election Commission (“FEC”) seeking an immediate investigation and enforcement action against Senator Kyrsten Sinema (I-AZ) and her principal campaign committee, Sinema for Arizona, for apparent direct and serious violations of the Federal Election Campaign Act (“FECA”).

2. Throughout 2024, and in violation of FECA, Senator Sinema appears to have used her principal campaign committee, Sinema for Arizona, to fund her personal travel, including domestic chartered and international flights as well as meals, catering, and lodging related to trips to Europe, Boston, the California wine country, and several other locations, which appear unrelated to any campaign or official business.

3. FECA prohibits political campaign committees from expending campaign funds for personal use if the expenses “would exist irrespective of the candidate’s election campaign.” 52 U.S.C. § 30114(b)(2). Senator Sinema appears to have used the financial support of her campaign committee in place of other sources of funding to pay for her personal travel, which existed irrespective of her government service and Senate campaign. Notably, Senator Sinema had announced she would not run for reelection on March 5, 2024, exactly eight months before Election Day, and before Sinema for Arizona disbursed over one hundred thousand dollars for what appear to be personal travel expenses. Sinema for Arizona received no contributions, other than one unitemized dollar, after disbursing these funds.

4. The Commission must enforce FECA in light of what appear to be flagrant and serious violations of the law.

#### Complainants

5. Complainant CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials and to ensuring their integrity. CREW is dedicated to empowering citizens to have an influential voice in the governmental decision-making process. CREW uses a combination of research, litigation, and advocacy to advance its mission.

6. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct in our electoral process and system of government. Toward this end, CREW monitors the campaign finance activities of those who run in elections for federal office and publicizes those who violate federal campaign finance laws. Through its website, press releases and other methods of distribution, CREW also files complaints with the FEC when it discovers violations of the FECA. Publicizing campaign finance violators and filing complaints with the FEC serves CREW's mission of keeping the public informed about individuals and entities that violate campaign finance laws and deterring future violations of campaign finance law.

#### Respondents

7. Kyrsten Sinema is the senior United States Senator for Arizona. On March 5, 2024, after months of public speculation about her campaign for re-election, Senator Sinema announced her intention to "leave the Senate at the end of this year," rather than seek another term in office. Senator Kyrsten Sinema, *A Message for Arizonans from Senator Kyrsten Sinema* (Mar. 5, 2024), <https://www.sinema.senate.gov/a-message-for-arizonans-from-senator-kyrsten-sinema/> [<https://perma.cc/LR84-UR7J>].

8. Sinema for Arizona is the principal campaign committee of Senator Sinema's 2024 senate campaign. *See* Sinema for Arizona, Statement of Org. (original), FEC Form 1, at 2 (Dec. 15, 2022), <https://docquery.fec.gov/pdf/321/202212159562585321/202212159562585321.pdf> [<https://perma.cc/JT3A-72JV>].

#### Factual Allegations

9. Kyrsten Sinema is a sitting U.S. Senator representing Arizona. On December 15, 2022, Senator Sinema filed her statement of candidacy to run for reelection. *See* Kyrsten Sinema, *Statement of Candidacy 2022*, FEC Form 2, at 1, (Dec. 15, 2022), <https://docquery.fec.gov/pdf/311/202212159562585311/202212159562585311.pdf> [<https://perma.cc/66GN-FNUX>].

10. On March 5, 2024, Senator Sinema announced publicly that she would no longer seek re-election to the Senate. *See* Senator Kyrsten Sinema, *A Message for Arizonans from Senator Kyrsten Sinema* (Mar. 5, 2024), <https://www.sinema.senate.gov/a-message-for-arizonans-from-senator-kyrsten-sinema/> [<https://perma.cc/LR84-UR7J>].

11. With the exception of a single unitemized dollar, Sinema for Arizona has not received any new contributions since March 7, 2024. Sinema for Arizona, Quarterly Report (original), FEC Form 3, at 3, (July 14, 2024), <https://docquery.fec.gov/pdf/006/202407149653218006/202407149653218006.pdf> [<https://perma.cc/X887-5U6F>]; Sinema for Arizona, Quarterly Report (original), FEC Form 3, at 3, (Oct. 14, 2024), <https://docquery.fec.gov/pdf/328/202410149685245328/202410149685245328.pdf> [<https://perma.cc/5F5Q-SFZ6>].

12. Many of Sinema for Arizona’s disbursements during the period between March 29, 2024 and September 30, 2024 appear to have supported Senator Sinema’s travel, including domestic chartered and international flights as well as meals, catering, and lodging expenses, which appear unrelated to any campaign or official business. *See* Sinema for Arizona, Quarterly Report (original), FEC Form 3, (Apr. 15, 2024),

<https://docquery.fec.gov/pdf/729/202404159627731729/202404159627731729.pdf>

[<https://perma.cc/G7EW-S7M4>]; *see also* Sinema for Arizona, Quarterly Report (original), FEC Form 3, (July 14, 2024),

<https://docquery.fec.gov/pdf/006/202407149653218006/202407149653218006.pdf>

[<https://perma.cc/X887-5U6F>]; *see also* Sinema for Arizona, Quarterly Report (original), FEC Form 3, (Oct. 14, 2024),

<https://docquery.fec.gov/pdf/328/202410149685245328/202410149685245328.pdf>

[<https://perma.cc/5F5Q-SFZ6>]. Notably, these trips took place after Senator Sinema’s announcement that she no longer intends to run for reelection.

13. On or about March 29, 2024, Sinema for Arizona made at least eleven travel related disbursements totalling \$3,120.83 to vendors in Italy, apparently unrelated to any campaign or official Congressional duties, including:

- \$918.23 at Duo Milan Porta Nuova, Milan, Italy on March 29, 2024
- \$364.26 at Duo Milan Porta Nuova, Milan, Italy on March 29, 2024
- \$204.89 at Duo Milan Porta Nuova, Milan, Italy on March 29, 2024
- \$25.99 at Duo Milan Porta Nuova, Milan, Italy on March 29, 2024
- \$6.50 at Duo Milan Porta Nuova, Milan, Italy on March 29, 2024
- \$389.00 at Italia Rail, Rome, Italy on March 29, 2024
- \$286.00 at Italia Rail, Rome, Italy on March 29, 2024
- \$53.00 at Italia Rail, Rome, Italy on March 29, 2024
- \$533.52 at Ristorante Fortunato, Rome, Italy on March 29, 2024
- \$78.08 at Algiboni, Rome, Italy on March 29, 2024
- \$261.36 at Algiboni, Rome, Italy on March 29, 2024

See Sinema for Arizona, Quarterly Report (original), FEC Form 3, at 11-14, 16, (July 14, 2024), <https://docquery.fec.gov/pdf/006/202407149653218006/202407149653218006.pdf>

[<https://perma.cc/X887-5U6F>].

14. Through an extensive search of the public record, CREW has been unable to identify any campaign or official trips Senator Sinema was on to Italy at the time of these expenditures.

15. Following Senator Sinema’s trip to Italy, Sinema for Arizona made several travel related disbursements to vendors in and around Boston, Massachusetts on or about April 17, 2024. See Sinema for Arizona, Quarterly Report (original), FEC Form 3, at 39-43, (July 14, 2024),

<https://docquery.fec.gov/pdf/006/202407149653218006/202407149653218006.pdf>

[<https://perma.cc/X887-5U6F>].

16. This year, the Boston Marathon took place on April 15, 2024 in Boston, Massachusetts. See Boston Athletic Association, *Marathon Dates*,

<https://www.baa.org/races/boston-marathon/plan/marathon-dates>

[<https://perma.cc/757W-HHFM>].

17. Senator Sinema has previously used campaign funds to participate in the Boston Marathon. In the past, Senator Sinema has justified Sinema for Arizona’s spending on trips to Boston for the marathon for campaign purposes citing its location and attendance making it “a prime location and time for effective fundraising.” FEC, First General Counsel’s Report, *MUR 8140 (Sinema for Arizona, et al.)*, at 10, (July 10, 2024),

[https://www.fec.gov/files/legal/murs/8140/8140\\_09.pdf](https://www.fec.gov/files/legal/murs/8140/8140_09.pdf) [<https://perma.cc/H7DA-NQ7X>]. No

such fundraising activity appears to have occurred during her 2024 travel to Boston around the time of this year’s marathon.

18. On or about April 17, 2024, Sinema for Arizona made at least nine travel related disbursements totalling \$7,990.57 to vendors in and around Boston, Massachusetts, which appear unrelated to any fundraising, campaign, or official business, including:

- \$522.92 at Davio's Catering, Boston, MA on April 17, 2024
- \$218.29 at Bocellis, Medford, MA on April 17, 2024
- \$307.00 at Nash Bar & Stage, Boston, MA on April 17, 2024
- \$605.04 at Grill 23 & Bar, Boston, MA on April 17, 2024
- \$3,640.24 at Davio's Catering, Boston, MA on April 17, 2024
- \$60.00 at Fairmont Copley Plaza, Boston, MA on April 17, 2024
- \$450.02 at Star Market Company, Inc., West Bridgewater, MA on April 17, 2024
- \$112.02 at Fairmont Copley Plaza, Boston, MA on April 17, 2024
- \$2,075.04 at Empire, Boston, MA on April 17, 2024

See Sinema for Arizona, Quarterly Report (original), FEC Form 3, at 39-43, (July 14, 2024),

<https://docquery.fec.gov/pdf/006/202407149653218006/202407149653218006.pdf>

[<https://perma.cc/X887-5U6F>].

19. Sinema for Arizona did not report receiving any contributions following the trip. *Id.* at 2.

20. Through an extensive search of the public record, CREW has been unable to identify any campaign or official trips Senator Sinema was on to Boston at the time of these expenditures.

21. During July and early August of 2024, following the Senator's trip to Boston, Sinema for Arizona made disbursements supporting travel and events in Sonoma, California and Aspen, Colorado, among other locations. During this time, the committee also purchased travel for Senator Sinema from chartered flight company, JSX. Sinema for Arizona, Quarterly Report (original), FEC Form 3, at 18, 31, 60, 63, 66-67, 73, 90, 98, 107, 112, 121, 135, 137, (Oct. 14,

2024), <https://docquery.fec.gov/pdf/328/202410149685245328/202410149685245328.pdf>

[<https://perma.cc/5F5Q-SFZ6>].

22. Senator Sinema's connection to Sonoma and the California wine country has been documented in public reporting. Daniel Boguslaw, *Kyrsten Sinema Used the Winery Where She*

*Interned to Fundraise with Private Equity*, The Intercept (Sept. 26, 2021),

<https://theintercept.com/2021/09/26/kyrsten-sinema-private-equity-tax-loophole/>

[<https://perma.cc/UW3K-BWBU>]. For example, in August 2020, Senator Sinema participated in a two week paid internship at Three Sticks Wines, an establishment that Sinema for Arizona is now paying to cater events following the termination of Senator Sinema’s candidacy. *See* Sinema for Arizona, Quarterly Report (original), FEC Form 3, at 66 (Oct. 14, 2024),

<https://docquery.fec.gov/pdf/328/202410149685245328/202410149685245328.pdf>

[<https://perma.cc/5F5Q-SFZ6>]; Dave Levinthal, Sen. Kyrsten Sinema's side hustle: earning cash as a California winery intern, Business Insider (May 10, 2021),

<https://www.businessinsider.com/kyrsten-sinema-coca-cola-boycott-stocks-congress-pete-session-s-2021-5> [<https://perma.cc/243D-ZLT7>]; Dave Levinthal and Robin Bravender, Kyrsten

Sinema’s campaign just spent \$1,180 at a winery. The committee called it ‘meeting expenses,’ but the winery offered different details, Business Insider (Oct. 15, 2021),

<https://www.businessinsider.com/kyrsten-sinemas-wine-winery-internship-campaign-expense-three-sticks-2021-10> [<https://perma.cc/3NK4-H48Z>]. In 2020, Senator Sinema had not reported any

expenses associated with her internship at Three Sticks Wines as campaign-related

disbursements. Sinema for Arizona, Quarterly Report (original), FEC Form 3, (Oct. 14, 2020),

<https://docquery.fec.gov/pdf/334/202010149293889334/202010149293889334.pdf>

[<https://perma.cc/Q92N-HHNH>].

23. In July through September 2024, Sinema for Arizona made at least sixteen travel related disbursements in California and Colorado totalling \$15,014.66 in the late summer which appear unrelated to any fundraising or official business, including:

- \$900.00 at Jing, Aspen, CO on July 5, 2024
- \$240.00 at Hotel Jerome, Aspen, CO on July 5, 2024

- \$78.88 at The St. Regis Aspen Resort, Aspen, CO on July 13, 2024
- \$1,054.96 at Rosewood Sand Hill, Menlo Park, CA on July 15, 2024
- \$80.00 at Rosewood Sand Hill, Menlo Park, CA on July 15, 2024
- \$145.64 at Rosewood Sand Hill, Menlo Park, CA on August 1, 2024
- \$599.00 at JSX Airlines, Dallas, TX on August 1, 2024
- \$1,196.82 at The Matheson, Healdsburg, CA on August 1, 2024
- \$510.42 at Three Sticks Wines, Sonoma, CA on August 7, 2024
- \$609.00 at JSX Airlines, Dallas, TX on August 7, 2024
- \$1,454.63 at Promontory, Oakville, CA on August 8, 2024
- \$3051.89 at The St. Regis Aspen Resort, Aspen, CO on August 13, 2024
- \$3051.89 at The St. Regis Aspen Resort, Aspen, CO on August 13, 2024
- \$246.26 at Ash’Kara Restaurant, Denver, CO on August 30, 2024
- \$50.26 at The St. Regis Aspen Resort, Aspen, CO on August 30, 2024
- \$1,745.01 at The Donum Estate, Sonoma, CA on September 6, 2024

See Sinema for Arizona, Quarterly Report (original), FEC Form 3, at 34-35, 50, 55-56, 66-67, 69, 73, 97-98, 107 (Oct. 14, 2024),

<https://docquery.fec.gov/pdf/328/202410149685245328/202410149685245328.pdf>

[<https://perma.cc/5F5Q-SFZ6>].

24. Through an extensive search of the public record, CREW has been unable to identify any campaign or official trips Senator Sinema was on to California or Colorado at the time of these expenditures.

25. In addition to the specified trips above, Sinema for Arizona issued disbursements for at least 91 other travel related expenses, including expenses in multiple foreign countries from late August through September 2024 totaling \$81,552.51 (including \$3,626.10 in the United Kingdom and \$5,427.21 in France) which appear unrelated to any fundraising, campaign, or official business, including:

- \$328.47 at American Airlines, Fort Worth, TX on August 20, 2024
- \$513.48 at American Airlines, Fort Worth, TX on August 20, 2024
- \$59.95 at American Airlines, Fort Worth, TX on August 20, 2024
- \$217.85 at Rosa’s Baker Street, London, England on August 20, 2024
- \$312.46 at Nobu Hotel London Portman Square, London, England on August 20, 2024
- \$888.37 at Tamarind Kitchen, London, England on August 20, 2024



- \$2,827.08 at Castel de Tres Girard, Morey-Saint-Denis, France on August 20, 2024
- \$617.97 at Southwest Airlines, Dallas, TX on August 20, 2024
- \$588.55 at L'Auberge Del Mar, Del Mar, CA on August 26, 2024
- \$690.61 at L'Auberge Del Mar, Del Mar, CA on August 26, 2024
- \$1,042.15 at L'Auberge Del Mar, Del Mar, CA on August 26, 2024
- \$1,084.81 at Inhabit Queens Gardens, London, England on August 26, 2024
- \$1,121.32 at Inhabit Queens Gardens, London, England on August 26, 2024
- \$1.29 at Inhabit Queens Gardens, London, England on August 26, 2024
- \$214.10 at Delta Airlines, Atlanta, GA on August 26, 2024
- \$524.74 at 135 Del Papa, Paris, France on August 26, 2024
- \$364.00 at JSX Airlines, Dallas, TX on August 26, 2024
- \$636.00 at L'Auberge Del Mar, Del Mar, CA on August 30, 2024
- \$123.78 at L'Auberge Del Mar, Del Mar, CA on August 30, 2024
- \$438.69 at Marriott International, Inc., Bethesda, MD on August 30, 2024
- \$209.62 at Argyle Winery, Dundee, OR on August 30, 2024
- \$260.62 at Argyle Winery, Dundee, OR on August 30, 2024
- \$189.98 at Southwest Airlines, Dallas, TX on August 30, 2024
- \$975.00 at Royal Airport Concierge, Roissy-en-France, France on August 30, 2024
- \$1,294.97 at L'Auberge Del Mar, Del Mar, CA on August 30, 2024
- \$1,312.47 at L'Auberge Del Mar, Del Mar, CA on August 30, 2024
- \$5.71 at L'Auberge Del Mar, Del Mar, CA on August 30, 2024
- \$2,438.06 at AirBNB, Inc., San Francisco, CA on August 30, 2024
- \$1,100.39 at Jardin d'Hiver, Paris, France on August 30, 2024
- \$219.10 at Delta Airlines, Atlanta, GA on September 6, 2024
- \$238.45 at Mr. B's Wine & Spirits, Denver, CO on September 6, 2024
- \$3,069.73 at Marriott International, Inc., Bethesda, MD on September 6, 2024
- \$296.48 at American Airlines, Fort Worth, TX on September 6, 2024
- \$460.00 at Cantina, San Diego, CA on September 6, 2024
- \$768.48 at Delta Airlines, Atlanta, GA on September 9, 2024
- \$399.00 at JSX Airlines, Dallas, TX on September 9, 2024
- \$239.47 at American Airlines, Fort Worth, TX on September 9, 2024
- \$597.48 at American Airlines, Fort Worth, TX on September 9, 2024
- \$524.01 at AirBNB, Inc., San Francisco, CA on September 9, 2024
- \$320.48 at American Airlines, Fort Worth, TX on September 9, 2024
- \$1,560.86 at Uber, San Francisco, CA, on September 11, 2024
- \$609.00 at JSX Airlines, Dallas, TX on September 13, 2024
- \$4,568.40 at The New York Edition, New York, NY on September 13, 2024
- \$255.10 at Delta Airlines, Atlanta, GA on September 13, 2024
- \$278.10 at Delta Airlines, Atlanta, GA on September 13, 2024
- \$568.48 at American Airlines, Fort Worth, TX on September 13, 2024
- \$2,167.77 at The New York Edition, New York, NY on September 16, 2024
- \$80.34 at The New York Edition, New York, NY on September 16, 2024
- \$6,600.20 at American Airlines, Fort Worth, TX on September 16, 2024
- \$5,251.00 at Delta Airlines, Atlanta, GA on September 16, 2024

- \$747.92 at The West Hollywood Edition, West Hollywood, CA on September 16, 2024
- \$275.60 at American Airlines, Fort Worth, TX on September 16, 2024
- \$252.30 at United Airlines, Chicago, IL on September 18, 2024
- \$59.95 at American Airlines, Fort Worth, TX on September 18, 2024
- \$224.25 at Milady's, New York, NY on September 18, 2024
- \$4,362.31 at Marriott International, Inc., Bethesda, MD on September 18, 2024
- \$1,066.74 at Marriott International, Inc., Bethesda, MD on September 18, 2024
- \$96.21 at The New York Edition, New York, NY on September 18, 2024
- \$275.48 at American Airlines, Fort Worth, TX on September 18, 2024
- \$288.47 at American Airlines, Fort Worth, TX on September 18, 2024
- \$464.00 at Zaytinya, New York, NY on September 23, 2024
- \$845.00 at Nubluz, New York, NY on September 24, 2024
- \$2,543.00 at The New York Edition, New York, NY on September 25, 2024
- \$79.69 at The New York Edition, New York, NY on September 25, 2024
- \$1,340.45 at The New York Edition, New York, NY on September 25, 2024
- \$7.84 at The New York Edition, New York, NY on September 25, 2024
- \$211.79 at American Airlines, Fort Worth, TX on September 25, 2024
- \$6,584.30 at Attitude New York, Long Island City, NY on September 25, 2024
- \$254.77 at The New York Edition, New York, NY on September 25, 2024
- \$2,774.80 at The New York Edition, New York, NY on September 25, 2024
- \$1,624.40 at The New York Edition, New York, NY on September 25, 2024
- \$319.00 at JSX Airlines, Dallas, TX on September 25, 2024
- \$188.51 at Stretch Pizza, New York, NY on September 25, 2024
- \$433.48 at American Airlines, Fort Worth, TX on September 25, 2024
- \$346.48 at American Airlines, Fort Worth, TX on September 25, 2024
- \$324.82 at American Airlines, Fort Worth, TX on September 25, 2024
- \$63.00 at American Airlines, Fort Worth, TX on September 25, 2024
- \$888.47 at American Airlines, Fort Worth, TX on September 25, 2024
- \$611.48 at American Airlines, Fort Worth, TX on September 25, 2024
- \$144.82 at Marriott International, Inc., Bethesda, MD on September 30, 2024
- \$671.88 at Marriott International, Inc., Bethesda, MD on September 30, 2024
- \$243.47 at American Airlines, Fort Worth, TX on September 30, 2024
- \$204.47 at American Airlines, Fort Worth, TX on September 30, 2024
- \$204.47 at American Airlines, Fort Worth, TX on September 30, 2024
- \$1196.11 at Marriott International, Inc., Bethesda, MD on September 30, 2024
- \$265.53 at United Airlines, Chicago, IL on September 30, 2024
- \$152.06 at United Airlines, Chicago, IL on September 30, 2024
- \$177.31 at Argyle Winery, Dundee, OR on September 30, 2024
- \$745.50 at Attitude New York, Long Island City, NY on September 30, 2024
- \$263.48 at Delta Airlines, Atlanta, GA on September 30, 2024
- \$274.48 at Delta Airlines, Atlanta, GA on September 30, 2024

See Sinema for Arizona, Quarterly Report (original), FEC Form 3, at 80-160, (Oct. 14, 2024), <https://docquery.fec.gov/pdf/328/202410149685245328/202410149685245328.pdf> [<https://perma.cc/5F5Q-SFZ6>].

26. Through an extensive search of the public record, CREW has been unable to identify any campaign or official trips Senator Sinema was on to the United Kingdom, France, California, New York, or Oregon at the time of these expenditures.

#### COUNT I


27. The FECA prohibits a candidate for federal office from using campaign funds to pay the personal obligations of the candidate. The Act states that “[a] contribution or donation . . . shall not be converted by any person to personal use.” 52 U.S.C. § 30114(b)(1). The Act further specifies that “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 vacation or other noncampaign-related trip . . . [or] admission to a sporting event, concert, theater, or other form of entertainment not associated with an election campaign . . . .” 52 U.S.C. §§ 30114(b)(2)(E), (H); *see also* 11 C.F.R. §§ 113.1(g)(1)(i)(F), (J). As evidenced by the expenditures listed above, none of which appear to have a legitimate connection to the activities of Senator Sinema’s official duties or her senate campaign, Sinema for Arizona appears to have served as a vehicle for Senator Sinema to convert contributions into personal expenses associated with personal international and domestic travel.

28. By using campaign funds to subsidize her personal travel, there is reason to believe that Kyrsten Sinema, as well as Sinema for Arizona, violated 52 U.S.C. §§ 30114(b)(2)(E), (H), (I), and 11 C.F.R. §§ 113.1(g)(1)(i)(F), (G), (J).

29. If these violations were knowing and willful, it is subject to criminal penalties and should be referred to the Department of Justice for investigation. 52 U.S.C. §§ 30109(a)(5)(C), 30109(d)(1).

#### CONCLUSION

WHEREFORE, Citizens for Responsibility and Ethics in Washington requests that the Federal Election Commission conduct an investigation into these allegations, declare the respondents to have violated the Federal Election Campaign Act and applicable FEC regulations, and impose sanctions appropriate to these violations and take such further action as may be appropriate, including, but not limited to, referring this case to the Department of Justice for criminal prosecution and/or conducting an audit of Sinema for Arizona.




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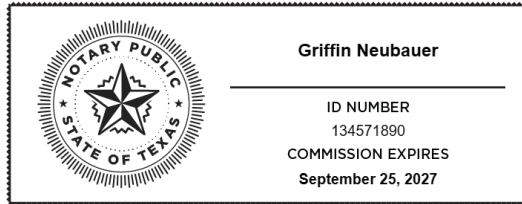
Verification

Citizens for Responsibility and Ethics in Washington hereby verifies that the statements made in the attached Complaint are, upon information and belief, true. Sworn pursuant to 18 U.S.C. § 1001.

  
\_\_\_\_\_  
Adam Rappaport

Sworn to and subscribed before me this 17th day of December, 2024

  
\_\_\_\_\_  
Notary Public Texas Denton County



Electronically signed and notarized online using the Proof platform.