



July 24, 2018

Federal Election Commission  
Lisa J. Stevenson, Acting General Counsel  
Office of the General Counsel  
1050 First Street, NE  
Washington, DC 20463  
*Submitted via email and U.S.P.S.*

**Petition for Rulemaking to Revise and Amend Regulations Relating to the Personal Use of Leadership PAC Funds**

Dear Ms. Stevenson,

Pursuant to 11 C.F.R. § 200.1 et seq., Campaign Legal Center (“CLC”), Issue One, and former United States Representatives Rod Chandler (R-WA), Larry LaRocco (D-ID), Peter Smith (R-VT), Claudine Schneider (R-RI), and John Tanner (D-TN) hereby petition the Federal Election Commission to open a rulemaking to revise and amend 11 C.F.R. § 113.1(g), the regulation defining the personal use of campaign funds, to clarify the application of this rule to so-called “Leadership PACs.”

Congress has prohibited “any contribution accepted by a candidate” and “any other donation received by an individual as support for activities of the individual as a holder of Federal office” from being converted to the “personal use” of the candidate or any other person. 52 U.S.C. §§ 30114(a), 30114(b)(1). By its very terms, this statutory personal use prohibition is applicable to any contribution received by a candidate’s leadership PAC, and Commission rules should reflect this clear statutory mandate.

Although the Commission has allowed for the creation of leadership PACs to permit candidates and officeholders to support other candidates or party committees, the attached report demonstrates that leadership PACs are commonly used as slush funds to subsidize officeholders’ lifestyles.

As the analysis in the attached report (“All Expenses Paid: How Leadership PACs Became Politicians’ Preferred Ticket to Luxury Living”) demonstrates, over the past five years, only 45% of all leadership PAC spending has gone towards contributions to other candidates or political committees—and many leadership PACs give even less. Yet over that same period, candidates and officeholders have spent millions in leadership PAC funds at resorts, golf courses, and high-end steakhouses. For example, candidates and officeholders have used leadership PAC funds to spend at least:

- \$871,000 explicitly on “golf” related expenditures;
- \$765,000 at the Greenbrier Sporting Club in West Virginia;
- \$741,000 at St. Regis Hotels and Resorts, \$113,608 of which was spent at the St. Regis Ski Resort in Aspen, Colorado;
- \$487,000 at the Dorado Beach Resort in Puerto Rico;
- \$469,000 at Walt Disney theme parks, hotels, resorts, and restaurants;
- \$276,000 on payments to the Washington Nationals for tickets, event venues, and catering;
- \$252,000 at Charlie Palmer Steak in Washington, D.C.; and
- \$154,000 at Bistro Bis.
- \$98,000 at the Venetian/Palazzo Hotel in Las Vegas;
- \$76,000 at the Wynn Las Vegas;

Leadership PAC funds have also been used to buy clothes at Allen Edmonds, to pay for wine tours and hunting licenses, and to cover tens of thousands of dollars of MLB, NBA, NFL, and Broadway tickets. One leadership PAC spent \$10,000 for a cigar club membership. Another spent \$21,240 explicitly on dues for a Maryland country club.

Officeholders cannot use their authorized campaign committee funds for “personal use” – like country club fees, clothing purchases, and trips to Disneyworld – but the Commission has been unlawfully reticent to apply this prohibition to leadership PACs.

We are asking for this to change. The Commission has a plain statutory mandate to end the personal use exemption the Commission granted to leadership PACs, and the examples in the attached report provide compelling reasons for ending that exemption.

## Background

The Commission ushered leadership PACs into existence in 1978, following an advisory opinion allowing Congressman Henry Waxman (D-CA) to participate in the operation of a political committee, other than his own authorized committee, to support the candidacies of his colleagues. Advisory Opinion 1978-12 (Waxman).<sup>1</sup>

In the years following Advisory Opinion 1978-12, the use of leadership PACs has become widespread. Today, an overwhelming majority of representatives and senators have their own leadership PACs — 88 percent of House members and 98 out of 100 U.S. Senators, according to the Center for Responsive Politics.<sup>2</sup>

Leadership PACs are largely a creation of the Commission; they were neither anticipated nor defined in FECA. When Congress enacted the Honest Leadership and Open Government Act of 2007 (“HLOGA”),<sup>3</sup> it sought to ensure that the law’s disclosure of lobbyist bundling activity and limits on travel on private aircraft applied equally to leadership PACs, and established a definition at 52 U.S.C. 30104(i)(8)(B). In 2009,<sup>4</sup> the Commission adopted a nearly identical definition at 11 C.F.R. § 100.5(e)(6):

Leadership PAC means a political committee that is directly or indirectly established, financed, maintained or controlled by a candidate for Federal office or an individual holding Federal office but which is not an authorized committee of the candidate or individual and which is not affiliated with an authorized committee of the candidate or individual, except that leadership PAC does not include a political committee of a political party.

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<sup>1</sup> Specifically, the Commission deemed that such a PAC would not be considered an authorized committee of Congressman Waxman, as long as the Congressman did not authorize the committee in writing. Advisory Opinion 1978-12. As a result, contributors to the leadership PAC were not regarded as making contributions with respect to the Congressman’s campaign. *Id.* Throughout the 1980s and 1990s, the Commission took a case-by-case approach to determine whether a leadership PAC was affiliated with a candidate’s authorized committee—usually finding that they were not affiliated—and in 2003, adopted regulations at 11 C.F.R. § 100.5(g)(5) removing the possibility that a leadership PAC can be affiliated with a candidate’s authorized committee. *See* Explanation and Justification for Final Rule, Leadership PAC, 68 FR 67013 (Dec. 1, 2003).

<sup>2</sup> OpenSecrets, *Leadership PACs: Money to Congress*, CENTER FOR RESPONSIVE POLITICS, <https://www.opensecrets.org/industries/summary.php?ind=Q03&recipdetail=A&sortorder=U&mem=Y&cycle=2016> (last visited Mar 5, 2018).

<sup>3</sup> Pub. L. No. 110-81, 121 Stat. 735.

<sup>4</sup> *See* Reporting Contributions Bundled by Lobbyists, Registrants and the PACs of Lobbyists and Registrants, 74 FR 7285, 7286 (Feb. 17, 2009).

The Commission authorized leadership PACs with the understanding that the federal candidate or officeholder controlling the leadership PAC would use the funds raised to support other candidates and party committees. As the Commission noted in its 2002 Notice of Proposed Rulemaking on Leadership PACs:

The monies these committees receive are given to other Federal candidates to gain support when the officeholder seeks a leadership position in Congress, or are used to subsidize the officeholder's travel when campaigning for other Federal candidates. The monies may also be used to make contributions to party committees, including State party committees in key states, or donated to candidates for State and local office.<sup>5</sup>

The Commission has also described leadership PACs as “organizations set up by congressional leaders and other Federal candidates and officeholders as a way to support other candidates' campaigns.”<sup>6</sup>

However, in the absence of clear guidance from the Commission, federal candidates and officeholders have routinely used leadership PAC funds for purposes other than supporting other candidates and party committees. Over the past five years, only 45% of all leadership PAC spending has gone towards contributions. In the 2016 cycle, leadership PACs spent more than \$160 million, but made only about \$74 million—less than half of their total expenditures—in contributions.

In other words, it appears that the majority of leadership PAC disbursements are for purposes other than those for which leadership PACs were allowed to exist in the first place.

And as described in the attached report, candidates and officeholders are routinely using leadership PAC funds in ways that appear to constitute personal use—and which would likely be prohibited if made from an officeholder's authorized committee.

The risk of corruption associated with the conversion of leadership PAC contributions to personal use is amplified given that leadership PACs are generally subject to higher contribution limits than authorized committees. A candidate's

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<sup>5</sup> Notice of Proposed Rulemaking on Leadership PACs, 67 FR 78753, 78754 (Dec. 26, 2002) (citations omitted); *see also* Explanation and Justification for Final Rule, Leadership PAC, 68 FR 67013, 67014 (Dec. 1, 2003).

<sup>6</sup> Notice of Proposed Rulemaking on Prohibited and Excessive Contributions; Non-Federal Funds or Soft Money, 67 FR 35654, 35672 (May 20, 2002).

authorized committee may only accept contributions of up to \$2,700 per election from an individual, 52 U.S.C. § 30116(a)(1)(A), but a leadership PAC that qualifies for multicandidate status may accept contributions of up to \$5,000 per year, *id.* § 30116(a)(1)(C). In a two-year election cycle, a Congressman may only accept up to \$5,400 in contributions from an individual to their authorized committee, but may accept \$10,000 from that same individual to their leadership PAC. A U.S. senator operating on a six-year election cycle may only accept \$5,400 from an individual donor to their campaign committee, but can take \$30,000 from that same individual for their leadership PAC.

In the absence of guidance from the Commission, candidates and officeholders are accepting large contributions for their leadership PAC, and expending those funds to subsidize their lifestyle.

It doesn't have to be this way. The Commission has the statutory authority to prohibit the conversion of leadership PAC contributions to personal use, and there are compelling reasons for it do so.

### **Request for Rulemaking**

One year after the Commission created the first leadership PAC, Congress in 1979 adopted a prohibition on “[a]mounts received by a candidate as contributions that are in excess of any amount necessary to defray his expenditures, and any other amounts contributed to an individual for the purpose of supporting his or her activities as a holder of Federal office” from being “converted by any person to any personal use.” 2 U.S.C. § 439a (1980).

In 2002, Congress revised this provision to clarify that the personal use prohibition applies to *all* contributions received by a federal candidate or officeholder—not just “excess” contributions—and today, the law states that “[a] contribution accepted by a candidate, and any other donation received by an individual as support for activities of the individual as a holder of Federal office,” shall not be converted to the “personal use” of the candidate or any other person. 52 U.S.C. § 30114(a), b)(1). Congress provided a non-exhaustive list of expenses that would constitute personal use, including the use of contributions for vacations, clothing purchases, country club memberships, and admission to sporting events. *Id.* § 30114(b)(2)(A)-(I).<sup>7</sup>

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<sup>7</sup> Contributions accepted by a candidate may be used by the candidate for, *inter alia*, “otherwise authorized expenditures in connection with the campaign for Federal office of the candidate,” 52 U.S.C. § 30114(a)(1), or for “ordinary and necessary expenses incurred in connection

A leadership PAC is a committee established, financed, maintained or controlled by a candidate, 52 U.S.C. § 30104(i)(8)(B); 11 C.F.R. § 100.5(e)(6), so a contribution to a candidate's leadership PAC is a "contribution accepted by a candidate." FECA prohibits the conversion of "any contribution accepted by a candidate" to the "personal use" of the candidate or any other person. 52 U.S.C. § 30114(a), (b)(1).

Moreover, the reason that the Commission has allowed officeholders to establish and accept contributions to leadership PACs is to support their duties as officeholders—specifically, so that an officeholder may "support other candidates' campaigns"<sup>8</sup> in order "to gain support when the officeholder seeks a leadership position in Congress."<sup>9</sup> FECA's personal use prohibition covers any contribution accepted "by an individual as support for activities of the individual as a holder of Federal office." 52 U.S.C. § 30114(a), (b)(1).

In other words, contributions to leadership PACs are subject to the statutory personal use prohibition.

Accordingly, we request that the Commission open a rulemaking to amend 11 C.F.R. § 113.1(g) and clarify that the statutory prohibition on converting "any contribution accepted by a candidate" and any contribution received "as support for activities of the individual as a holder of Federal office" to personal use is applicable to any contribution received by a candidate's leadership PAC. For example, the Commission could amend section 113.1(g) to state:

***Personal use*** means any use of funds in a campaign account *or leadership PAC account* of a present or former candidate to fulfill a commitment, obligation or expense of any person that would exist irrespective of the candidate's campaign or duties as a Federal officeholder.

Accordingly, petitioners request that the Commission promptly publish a Notice of

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with duties of the individual as a holder of Federal office," § 30114(a)(2), as well as for expressly permitted uses such as contributions to party committees, *id.* § 30114(a)(4), or candidates, *id.* § 30114(a)(5). As such, clarifying that the personal use prohibition applies to leadership PACs would not limit the ability of candidates to use leadership PACs to make contributions to candidates or party committees, as such uses are expressly permitted under FECA.

<sup>8</sup> 67 FR at 35672.

<sup>9</sup> 67 FR at 78754.

Availability of this petition in the Federal Register, 11 C.F.R. § 200.3(a)(1), and thereafter initiate a rulemaking to consider promulgation of the proposed regulation set forth above. *Id.* § 200.4(a).

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_  
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\_\_\_\_\_/s/\_\_\_\_\_  
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\_\_\_\_\_/s/\_\_\_\_\_  
Rep. Larry LaRocco (D-ID)

\_\_\_\_\_/s/\_\_\_\_\_  
Rep. Peter Smith (R-VT)

\_\_\_\_\_/s/\_\_\_\_\_  
Rep. Rod Chandler (R-WA)

\_\_\_\_\_/s/\_\_\_\_\_  
Rep. Claudine Schneider (R-RI)

\_\_\_\_\_/s/\_\_\_\_\_  
Rep. John Tanner (D-TN)

# All Expenses Paid:

How Leadership PACs Became  
Politicians' Preferred Ticket to Luxury Living







## methodology

On February 27, 2018, the Federal Election Commission provided Issue One and CLC with itemized records of leadership PAC disbursements since 2005. On May 8, 2018, the FEC provided updated 2017-2018 records to reflect reported expenditures through the first quarter of 2018. The final data set examined for this report includes nearly 200,000 records from January 2013 through the first quarter of 2018. From this data set of expenditures, Issue One and CLC ran myriad searches of common categories, vendors, and purpose descriptions in order to arrive at aggregate figures, which were rounded down to the nearest thousand, and to extract examples of discrete expenditures by particular leadership PACs, which were rounded to the nearest dollar.

Additionally, on July 3, 2018, the Center for Responsive Politics provided Issue One and CLC with aggregate data on leadership PACs' contributions to other candidates and political groups. In this report, when the Center for Responsive Politics data are used, that is noted. If not specified, the data are from the FEC.

The report reflects notable expenditures in various categories, but it is by no means a comprehensive assessment of all leadership PAC expenditures during this time period. We hope that, by classifying categories and highlighting noteworthy line items, this report can serve as a starting point for further analyses, investigations, and reforms.

## acknowledgements

Maggie Christ and Brendan Fischer, working with Issue One Executive Director Meredith McGehee and Deputy Communications Director William Gray, authored this report. Michael Beckel assisted with the data acquisition. Molly Olonoff, Avneesh Chandra, and Aaron Danowski assisted with data analysis and fact-checking. Evan Ottenfeld and Shelby Wayment designed the final product. We are grateful to the other Campaign Legal Center and Issue One staff who helped with research and supported this project.

## executive summary

What do \$741,000 at St. Regis hotels and resorts, \$871,000 in golf-related expenses, and \$469,000 worth of spending at Walt Disney properties all have in common?

These expenditures, and many more, encapsulate how federal officeholders and candidates use so-called “leadership PACs” to subsidize lavish lifestyles on their donors’ dimes.

Little-known beyond the Beltway, these often-overlooked political committees, conceived in the 1970s, are frequently described as slush funds — and nearly every member of Congress has one.

It is not just one party or lawmaker perpetuating this system. A South Dakota senator spent \$403,000 at West Virginia’s Greenbrier Sporting Club. A Missouri senator spent \$117,000 at the Disney Yacht Club Resort in Florida. An Ohio congressman spent \$64,000 on Broadway tickets in New York City. A Georgia congressman spent \$34,000 for one event at the five-star Sea Island Resort. A Texas congressman spent \$21,000 on membership dues to a Maryland country club. A Kentucky senator spent \$4,000 for a limousine service in Rome.

Politicians did not cover these expenses from their own authorized campaign accounts; they likely would have violated the law if they had. Instead, they used their leadership PACs.

As prominent conservative writer Peter Schweizer has put it, for many members of Congress the leadership PAC has effectively become “a second personal bank account, or a second pocket from which politicians can pull money.”<sup>1</sup>

This report analyzes more than five years of leadership PAC data — nearly 200,000 records of discrete expenditures — obtained from the Federal Election Commission (“FEC”). Campaign Legal Center and Issue One found that, since 2013, politicians have spent millions of dollars from leadership PAC funds that may have been unlawful if the spending came from their own campaign accounts.

A leadership PAC is a political action committee (“PAC”) that is established by a candidate or federal officeholder but that is not his or her authorized campaign committee. In 1978, the FEC first allowed officeholders to establish leadership PACs to make contributions to congressional colleagues and garner support for their efforts to win leadership positions.

Yet today, a minority of leadership PAC spending goes towards contributions to other candidates or political committees: on average, only 45 percent, over the past three election cycles, according to our analysis of data provided by the Center for Responsive Politics.

And many leadership PACs give even less. For example, since 2013, less than 7 percent of Sen. Rand Paul’s (R-KY) leadership PAC spending has gone toward contributions to other candidates or committees, according to the Center for Responsive Politics,<sup>2</sup> but in the 2018 election cycle it has already spent \$11,043 at restaurants in Italy and Malta, \$4,492 on a limousine service in Rome, and \$1,904 at the St. George Lycabettus Hotel in Athens. Also since 2013, only 14 percent of Rep. Gregory Meeks’ (D-NY) leadership PAC spending has been used for contributions.<sup>3</sup> But Meeks’ leadership PAC has already spent \$9,391 at the Aria Resort in Las Vegas in the 2018 cycle — more than the \$7,000 it has given to other candidates or political committees this cycle.<sup>4</sup>

Instead, often under the guise of fundraising activity, officeholders and candidates overwhelmingly use leadership PAC money to pay for, among other things, five-star luxury resort stays, expensive dinners, trips to theme parks, golf outings, tickets to Broadway shows and sporting events, and international travel.

Since by law officeholders cannot use official campaign funds for “personal use” — like country club fees, clothing purchases, or family trips to Disney World — they have instead dipped into their leadership PAC funds for these expenses. This pattern arose, and has worsened, because the FEC has not applied the personal use prohibition to a politician’s leadership PAC.

It is troubling enough that officeholders use their leadership PAC funds to buy their way up the leadership ladder by giving to congressional colleagues. It is even more troubling that many are using their leadership PAC funds to subsidize their own luxurious lifestyles, including high-end vacations and country club memberships.

Some politicians claim costly events at five-star resorts or rounds of golf at private country clubs are fundraising expenses. But because many leadership PACs contribute proportionally small amounts to other political committees, many officeholders are seemingly raising money for leadership PACs to perpetuate a never-ending fundraising cycle. Is a “fundraising” trip to a Caribbean resort justifiable if the money raised is used to fund a politician’s next “fundraising” event at a luxury hotel in Las Vegas? Surely, most constituents would say not.

Additionally, after giving the maximum legal amount to an officeholder’s authorized committee, a donor can turn around and give even more to that politician’s leadership PAC, providing another avenue for wealthy donors and special interests to evade contribution limits and funnel money into politicians’ pockets.

Most constituents do not know that leadership PACs exist, nor do they know that their members of Congress have them.

These fundraising vehicles receive little, if any, scrutiny, and often remain under the radar. Leadership PACs epitomize the Washington swamp.

By chronicling topline trends as well as specific cases of leadership PAC expenditures, this report sheds light on how leadership PAC funds are being used and misused. This report concludes by calling on the FEC to act expeditiously to extend the personal use prohibition to leadership PACs and on Congress to pass legislation to prevent abuses of leadership PAC funds.

***These often-overlooked political committees are frequently described as slush funds — and nearly every member of Congress has one.***

# a brief history of leadership PACs

In 1978, Congressman Henry Waxman (D-CA) and a group of his supporters approached the FEC with a novel request: Could Waxman participate in the operation of a PAC, separate from his own campaign committee, which would support his colleagues' campaigns? Would the funds raised by this PAC count toward Congressman Waxman's candidate contribution limit?<sup>5</sup>

No provision existed in the Federal Election Campaign Act ("FECA") for such fundraising by a candidate or officeholder, but the FEC permitted the proposal. From that point forward, "Waxman's leadership PAC set the standard for those who aspired to leadership positions or committee chairs, and for the leaders and chairpersons themselves," as Professor Marian Currinder has explained.<sup>6</sup>

Generally speaking, a leadership PAC is a PAC that is established by a candidate or federal officeholder, but that is not the politician's authorized federal campaign committee.<sup>7</sup> In the 1980s, leadership PACs came to be used by members in, or aspiring to, congressional leadership, who would make contributions from PAC funds to congressional colleagues to garner support for their efforts to win leadership positions.<sup>8</sup>

These new pots of cash contributed to a system where ambitious politicians had to effectively buy their way to the top. Following the 1994 midterm elections, for example, Rep. Robert Walker (R-PA) and Rep. Tom DeLay (R-TX) were vying for the majority whip position. Rep. Walker chose not to play the game and made one \$1,000 contribution; Rep. DeLay formed a leadership PAC and eventually gave \$2 million to his colleagues.<sup>9</sup> Rep. DeLay won. The lesson was learned and leadership PACs became the *de rigueur* accessory for every

member of Congress who wished to secure a leadership role within their party.

Today, an overwhelming majority of representatives and senators have their own leadership PACs: 94 senators and approximately two-thirds of the House, as of 2013.<sup>10</sup> In fact, it has even become the norm for freshman members of Congress to set up leadership PACs almost immediately after their election — and, in some cases, even before they take office.<sup>11</sup>

As the use of leadership PACs has expanded, leadership PAC funds have been increasingly abused.

**As the use of leadership PACs has expanded, leadership PAC funds have been increasingly abused.**

Remember, the reason that the FEC authorized leadership PACs was to make contributions to other candidates. That's why the agency greenlighted Waxman's request in 1978, and ever since, the FEC has continued to assume that officeholders used leadership PAC funds to support their colleagues. As the agency explained in 2002, "[t]he monies these committees receive are given

to other Federal candidates to gain support when the officeholder seeks a leadership position in Congress, or are used to subsidize the officeholder's travel when campaigning for other Federal candidates."<sup>12</sup>

Our research shows that this is not the case. For example, according to data we obtained from the Center for Responsive Politics, leadership PACs collectively spent more than \$160 million in the 2016 cycle, but only around \$74 million of that total — less than half — went toward contributions to other federal candidates or political committees.

Instead of contributing to other candidates, some politicians have routinely used leadership PAC funds for luxury flights,

hotel rooms, fine dining, and event tickets. According to a 2006 *Wall Street Journal* analysis of leadership PAC data, from just the 2002 to the 2006 cycle, there was already a 1,040 percent increase in spending on limousines or car services and a 278 percent increase in spending on event tickets.<sup>13</sup>

The last major exposé on leadership PACs was in October 2013, when *60 Minutes* chronicled leadership PACs' rise and highlighted examples that showed how politicians on both sides of the aisle have spent their leadership PAC funds — often on luxury expenditures in vacation destinations.<sup>14</sup> This report, which features data from 2013 through the beginning of 2018, shows that in the absence of meaningful regulatory or legislative reforms, the practice has only continued since then.

By law, officeholders cannot use campaign funds for “personal use,” such as country club fees or trips to Disney World. The FEC, however, has been unlawfully reticent in applying this same prohibition to leadership PACs — and perhaps as a result, politicians have used leadership PAC funds for purposes that would likely be impermissible “personal use” if paid for by their own campaign committees.

As such, leadership PACs look more like slush funds to subsidize officeholder luxury lifestyles.

It is one thing to contribute to a candidate in order to support their run for office; it is another to fund an officeholder's trip to Vegas and their stay at the Venetian. The risk of corruption associated with the conversion of leadership PAC contributions to personal use is amplified given that leadership PACs are generally subject to higher contribution limits than authorized committees.

*A candidate's authorized committee may only accept contributions of up to \$2,700 per election from an individual, 52 U.S.C. § 30116(a)(1)(A), but a leadership PAC that qualifies for multicandidate status may accept contributions of up to \$5,000 per year. Id. § 30116(a)(1)(C). In a two-year election cycle, a Congressperson may only accept up to \$5,400 in contributions from an individual to their authorized committee, but may accept \$10,000 from that same individual to their leadership PAC. A U.S. senator operating on a six-year election cycle may only accept \$5,400 from an individual donor to their campaign committee, but can take \$30,000 from that same individual for their leadership PAC.*

The Senate ethics committee claims it has no jurisdiction over leadership PACs. House ethics rules, however, state that the personal use ban applies to leadership PACs.<sup>15</sup> In at least two instances, the Office of Congressional Ethics (“OCE”) has recommended an investigation into House members who appeared to use leadership PAC funds for personal use, but the ethics committee has thus far declined to take action.<sup>16</sup>

The FEC has the authority to put an end to these corrupting practices. The law says that “any contribution accepted by a candidate” and “any other donation received by an individual as support for activities of the individual as a holder of Federal office” cannot be converted to personal use; therefore, the personal use prohibition should clearly apply to funds accepted by a candidate's or officeholder's leadership PAC. Yet the FEC has failed to apply the personal use prohibition to leadership PACs — leading to the abuses described in this report.

# how have leadership PAC funds been spent?

Over the past five years, politicians have used leadership PACs for millions in payments to luxury hotels, resorts, clubs, restaurants, and much more.

Officeholders are specifically prohibited from using campaign funds to pay for vacations,<sup>17</sup> but, since 2013, they have used leadership PACs to spend at least **\$614,000** in the Virgin Islands and Puerto Rico, to spend at least **\$469,000** at Walt Disney theme parks, hotels, and restaurants, and in Las Vegas to spend: **\$98,000** at the Las Vegas Venetian/Palazzo Hotel, **\$76,000** at the Wynn Las Vegas, and **\$21,000** at the Las Vegas Morels French Steakhouse.

That is just the tip of the iceberg. Since 2013, politicians have also used leadership PACs to collectively spend at least:

- **\$765,000** at the Greenbrier Sporting Club in West Virginia;
- **\$741,000** at St. Regis Hotels and Resorts across the country;
- **\$487,000** at the Dorado Beach Resort in Dorado, Puerto Rico;
- **\$361,000** at Ritz-Carltons;
- **\$198,000** at Four Seasons Hotels;
- **\$142,000** at The Breakers, a Palm Beach resort;
- **\$113,000** at the St. Regis Ski Resort in Aspen, Colorado;
- **\$83,000** at the Beverly Hills Hotel;
- **\$75,000** at W Hotels; and
- **\$36,000** at the Aria Resort in Las Vegas.

When officeholders are in D.C., they regularly dip into their leadership PAC funds to treat themselves to high-class meals. Collectively, since 2013 politicians have used leadership PAC funds to spend at least:

- **\$252,000** at Charlie Palmer Steak;
- **\$192,000** at Joe's Seafood, Prime Steak & Stone Crab;
- **\$154,000** at Bistro Bis;
- **\$146,000** at Casa Luca;
- **\$136,000** at Acqua Al 2;
- **\$114,000** at Fiola;
- **\$112,000** at Morton's Steakhouse;
- **\$109,000** at The Capital Grille;
- **\$96,000** at Johnny's Half Shell;
- **\$89,000** at The Monocle; and
- **\$73,000** at Carmine's.

Leadership PACs have also spent at least **\$437,000** at the Capitol Hill Club, a private Washington D.C. social club for Republicans,<sup>18</sup> and **\$45,000** at the National Democratic Club, the Democratic counterpart.<sup>19</sup>

Officeholders and candidates are prohibited from using campaign funds to pay for country club memberships.<sup>20</sup> Yet, over the last five years, politicians have used leadership PAC funds for at least **\$871,000** in golf-related expenditures. For example, in January 2017 Rep. Pete Sessions (R-TX)'s leadership PAC, People for Enterprise Trade and Economic Growth (PETE PAC), paid **\$21,240** to the Caves Valley Golf Club in Maryland explicitly for "membership for P. Sessions." (In January of 2018, PETE PAC paid Caves Valley Golf Club **\$19,956**, but described the purpose of the payment as "golf event for PAC fundraising event, not for individual candidate," rather than for membership dues. Caves Valley reportedly charges \$20,000 in annual membership dues.<sup>21</sup>)

Politicians are generally barred from using campaign funds for dues to nonpolitical organizations, unless the dues are connected to a fundraising event.<sup>22</sup> But leadership PACs have been used to pay at least **\$67,000** in membership fees or dues to clubs and associations apart from political parties. For example, Mary's PAC, the leadership PAC of former Rep. Mary Bono Mack (R-CA), spent **\$10,000** on membership dues to CXIII Rex, a private cigar club in Alexandria, Virginia — and made the payment in August 2013, seven months after Mack left office.

Former Rep. Mack is not the only politician who has continued to use leadership PAC funds after leaving office. Former Representative William Delahunt (D-MA) left office in January 2011, but his leadership PAC spent **\$2,418** at the Hotel Tamanaco Caracas in Venezuela more than three years later, in the spring of 2014. Former Representative Ron Paul (R-KY) left office at the beginning of 2013, but from 2013 through 2015, Paul's daughter Lori Pyeatt received **\$48,186** in salary payments from Paul's leadership PAC, Liberty PAC.

Officeholders are prohibited from using campaign funds for clothing and apparel.<sup>23</sup> But some politicians have used leadership PAC cash to pay for new duds. For example, Sen. Rand Paul's (R-KY) leadership PAC, Reinventing a New Direction (RAND PAC), spent **\$337** on "apparel" at a Men's Warehouse in Omaha, Nebraska, in September 2014, and **\$438** on "apparel" at Allen Edmonds on Madison Avenue in New York City in February 2016.<sup>24</sup>

Officeholders are barred from using campaign funds for "admission to a sporting event, concert, theater, or other form of entertainment," unless part of a specific campaign or officeholder activity.<sup>25</sup> But leadership PAC funds have been used to pay **\$276,000** to the Washington Nationals for tickets, event venues, and catering, and **\$142,000** to the Verizon Center/Capital One

Arena, home of the Washington Capitals and Washington Wizards. Other specific event expenditures include:

- **\$4,897** spent by former Sen. Harry Reid's (D-NV) leadership PAC, Searchlight Leadership Fund, in April 2014 on tickets from Planet Hollywood in Las Vegas — during the same period Planet Hollywood was hosting Britney Spears' "*Britney: Piece of Me*" residency.<sup>26</sup>
- **\$3,320** spent by Rep. Aaron Schock's (R-IL) leadership PAC, GOP Generation Y Fund, in April 2013 on tickets from the Academy of Country Music, which held their annual Academy of Country Music Awards in April 2013.<sup>27</sup>

Many politicians will likely claim that, while their leadership PAC spending may appear to constitute personal use, it is in fact for

fundraising events for the PACs themselves — for example, that the costly trip to Disney or the round of golf at a private country club coincided with a pitch for leadership PAC donations.

However, there are a number of problems with explanations like these.

For one, many of these PACs have contributed proportionally small amounts to other political committees, and making contributions is the reason that the FEC has allowed leadership PACs to exist.

That means that many leadership PACs are effectively fundraising for the purpose of paying for more high-end fundraising events.

*Over the past five years, politicians have used leadership PACs for millions in payments to luxury hotels, resorts, clubs, restaurants, and much more.*

Further, the trend of hosting these events at high-end resorts, golf clubs, and restaurants implies a blurring of the lines between personal expenditures and “event” expenditures. These lines are especially blurred when the destinations are far from the representatives’ home states. A Wisconsin representative spending \$54,000 at Disney World, a Kentucky representative spending \$70,000 in Pebble Beach, California, or an Ohio representative spending \$64,000 on Broadway tickets should raise serious questions about why so many luxury expenditures are taking place so far away from the constituents the members purport to represent.

Unfortunately, FEC reports filed by leadership PACs tend to provide little insight into an expenditure’s purpose; many reports simply say “PAC event.” What makes a golf outing or a weekend stay at Pebble Beach a “PAC event”? The presence of a single donor? Or simply putting “PAC” in the description on the FEC report?

Even if there is a legitimate justification for a so-called “PAC event,” the lack of specificity and the failure to separate out many expenditures on FEC reports leaves an enormous amount unknown, including how much was spent on particular expenditures associated with a single event, how much the PAC actually raised at the event, whether the PAC paid fair market value for the goods or services, and who attended the event.

Even if there is ostensibly an official purpose for a trip in the form of a speech or a meeting, leadership PAC funds are being used to enhance the stay in the form of five-star hotels or limousine services. These “official” expenditures strain credulity even more when they take place overseas.

*These expenditures  
encapsulate how  
federal officeholders  
and candidates use  
so-called “leadership  
PACs” to subsidize  
lavish lifestyles on  
their donors’ dimes.*



## conclusion and solutions

As the examples in this report demonstrate, although leadership PACs were initially created so members of Congress could raise money for other candidates, federal officeholders are now using them to fund expensive hotel stays, meals, resort weekends, golf outings, entertainment, and leisure activities. More often than not, these expenditures take place in luxury vacation destinations well beyond the reach of most Americans.

Campaign contributions are accepted as a necessary element of our current privately funded system of elections; candidates need to raise money to reach voters, spread their message, and run for office. Officeholders and candidates are allowed to accept checks from donors in order to fund their campaigns, but are barred from converting those campaign funds to “personal use,” like paying country club fees or family trips to Disney World. If a candidate or officeholder can use donor dollars to subsidize their lifestyle or fund personal expenses, then campaign contributions pose a much greater risk of corruption.

Congress adopted the personal use prohibition in 1979, one year after the FEC created the first leadership PAC. Today, the law says that “any contribution accepted by a candidate” and “any other donation received by an individual as support for activities of the individual as a holder of Federal office” cannot be converted to the “personal use” of the candidate or any other person.<sup>28</sup>

Campaign Legal Center and Issue One believe that the FEC currently has the authority to act to close down this loophole. By definition, a leadership PAC is a committee established, financed, maintained, or controlled by a candidate,<sup>29</sup> so a contribution to a candidate’s leadership PAC is a “contribution accepted by a candidate.” Moreover, the reason that the FEC has allowed officeholders to establish and accept contributions to leadership PACs

is to support their duties as officeholders — specifically, according to the FEC, so that an officeholder may “support other candidates’ campaigns”<sup>30</sup> in order “to gain support when the officeholder seeks a leadership position in Congress.”<sup>31</sup>

Because “any contribution accepted by a candidate” or any contribution received “as support for activities of the individual as a holder of Federal office” cannot be converted to personal use, the law’s personal use prohibition should clearly apply to funds accepted by a candidate’s or officeholder’s leadership PAC.

For years, leadership PACs have existed in a legal gray area. In a 2008 Advisory Opinion, the FEC declined to apply the personal use prohibition to a leadership PAC, without providing any analysis.<sup>32</sup> But a few years later, two commissioners took the position that

the 2008 Advisory Opinion was wrongly decided, and that an officeholder cannot convert leadership PAC funds to personal use.<sup>33</sup> In a 2015 Advisory Opinion, the FEC could not agree on whether the personal use prohibition applied to leadership PACs.<sup>34</sup>

As a result, the FEC has provided little clarity about whether it believes the personal use prohibition applies to leadership PACs. But a plain-language reading of the law suggests that it does.

And because this plain reading makes clear the FEC has the necessary statutory authority, the agency should adopt new rules clarifying that the personal use prohibition applies to leadership PACs. Such rules would deter many abuses of leadership PAC funds and equip the agency to enforce the law against the worst offenders.

In addition, Congress could take action to deal with these problems — from banning leadership PACs altogether to counting

***It is long past time for the FEC or Congress to stop these abuses.***

contributions to the PACs against aggregate contribution limits, to extending the prohibitions on personal use to all political committees.

Additionally, the House and Senate ethics committees could begin cracking down on the misuse of leadership PAC funds, many examples of which have been detailed in this report.

As the examples in this report show, this problem is not unique to one party or the other: Members of Congress on both sides of the aisle have raised and spent millions from their leadership PACs. In doing so, they blur the lines between official and personal activity while schmoozing at venues far beyond the eyes, as well as the pocketbooks, of most of their constituents. It is long past time for the FEC or Congress to stop these abuses.

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## endnotes

<sup>1</sup> PETER SCHWEIZER, *EXTORTION: HOW POLITICIANS EXTRACT YOUR MONEY, BUY VOTES, AND LINE THEIR OWN POCKETS* 104 (2013).

<sup>2</sup> This percentage was obtained by summing the amounts the Center for Responsive Politics categorizes as “contributions” for the past three cycles and dividing by the sum of the total expenditures RAND PAC made over the past three cycles. OpenSecrets, *Reinventing a New Direction: Expenditures*, CENTER FOR RESPONSIVE POLITICS, <https://www.opensecrets.org/pacs/expenditures.php?cycle=2018&cmte=C00493924> (last visited June 8, 2018); OpenSecrets, *Reinventing a New Direction: Summary*, CENTER FOR RESPONSIVE POLITICS, <https://www.opensecrets.org/pacs/lookup2.php?cycle=2018&strID=C00493924> (last visited June 8, 2018).

<sup>3</sup> This percentage was obtained by summing the amounts the Center for Responsive Politics categorizes as “contributions” for the past three cycles and dividing by the sum of the total expenditures Build America PAC made over the past three cycles. OpenSecrets, *Build America PAC: Expenditures*, CENTER FOR RESPONSIVE POLITICS, <https://www.opensecrets.org/pacs/expenditures.php?cmte=C00377143&cycle=2018> (last visited June 8, 2018); OpenSecrets, *Build America PAC: Summary*, CENTER FOR RESPONSIVE POLITICS, <https://www.opensecrets.org/pacs/lookup2.php?cycle=2018&strID=C00377143> (last visited June 8, 2018).

<sup>4</sup> *Id.*

<sup>5</sup> FEC Advisory Opinion 1978-12 (Waxman), <https://www.fec.gov/files/legal/aos/1978-12/1978-12.pdf>.

<sup>6</sup> MARIAN CURRINDER, *MONEY IN THE HOUSE: CAMPAIGN FUNDS AND CONGRESSIONAL PARTY POLITICS* 25-26 (2008).

<sup>7</sup> *See, e.g.*, § CFR 100.5(R)(6).

<sup>8</sup> The FEC has described leadership PACs as “organizations set up by congressional leaders and other Federal candidates and officeholders as a way to support other candidates’ campaigns.” Notice of Proposed Rulemaking on Prohibited and Excessive Contributions; Non-Federal Funds or Soft Money, 67 FR 35654, 35672 (May 20, 2002). *See also* Robbins, Suzanne M., “Who’s Leading Whom: Leadership PAC Networks through the Republican Era of Congress” (2009). Working Papers. Paper 28 (recommended citation from the paper).

<sup>9</sup> *See* Editorial, *PAC Pollution*, N.Y. TIMES (Mar. 21, 1994), <https://nyti.ms/2sPr7SX>; *see also* Paul Burka, *Without DeLay*, TEXAS MONTHLY (May 2006), <https://www.texasmonthly.com/politics/without-delay/>.

<sup>10</sup> *See, e.g.*, Shane Goldmacher, *Why Nearly Everyone in Congress Has a Leadership PAC These Days*, THE ATLANTIC (July 22, 2013), <https://www.theatlantic.com/politics/archive/2013/07/why-nearly-everyone-congress-has-leadership-pac-these-days/313046/>.

<sup>11</sup> *Id.*

<sup>12</sup> Notice of Proposed Rulemaking on Leadership PACs, 67 FR 78753, 78754 (Dec. 26, 2002) (citations omitted); *see also* Explanation and Justification for Final Rule, Leadership PAC, 68 FR 67013, 67014 (Dec. 1, 2003).

<sup>13</sup> Brody Mullins, *Lawmakers Tap PAC Money to Pay Wide Array of Bills*, WALL ST. J. (Nov. 2, 2006), <https://www.wsj.com/articles/SB116241310949410514>.

<sup>14</sup> Steve Kroft, *Washington’s Open Secret: Profitable PACs*, CBS NEWS (Oct. 21, 2013), <https://www.cbsnews.com/news/washingtons-open-secret-profitable-pacs>.

<sup>15</sup> Under the House Code of Official Conduct, the term “campaign funds” is defined broadly to include leadership PAC funds, House Rule 23, clause 15(d)(1), and a member may not convert “campaign funds” to personal use, *id.* clause 6(b). Specifically, the term “campaign funds” means “funds of any political committee under the Federal Election Campaign Act of 1971, without regard to whether the committee is an authorized committee of the Member . . . involved under such Act.” *Id.* clause 15(c)(1); *see also* House Ethics Manual, 110th Congress, 2d Session, n.37.

<sup>16</sup> In 2011, OCE examined allegations that Rep. Robert Andrews (D-NJ) improperly used congressional campaign and leadership PAC funds to “pay for a personal trip” to Scotland and attend a wedding while accompanied by his wife and two daughters. *OCE Referral Regarding Rep. Robert Andrews*, Office of Congressional Ethics (Aug. 31, 2012), <https://oce.house.gov/reports/investigations/oce-referral-regarding-rep-robert-andrews>. After months of review, OCE’s board voted 6-0 to refer the case to the House Ethics Committee for further consideration, noting there was “substantial reason to believe” that he violated the House rules and federal law through spending funds for personal use.

The House Ethics Committee established an investigative subcommittee—one of its most significant tools — to delve deeper into the matter, but Andrews eventually resigned in February 2014, stopping the ethics committee’s investigation before it could conclude and issue a public finding. *Statement of the Chairman and Ranking Member of the Committee on Ethics Regarding Representative Robert Andrews*, House Committee on Ethics (Mar. 19, 2013), <https://ethics.house.gov/press-release/statement-chairman-and-ranking-member-committee-ethics-regarding-representative-robe-1>. See generally Meredith McGehee & William Gray, *The Ethics Blind Spot*, Issue One (2018), <https://www.issueone.org/wp-content/uploads/2018/02/Ethics-Blind-Spot-Final.pdf>.

Currently, the House Ethics Committee is reviewing another case referred by OCE that alleges Rep. John Duncan Jr. (R-TN) improperly spent \$100,000 from his campaign committee and leadership PAC on personal expenses including baby showers and country club dues and fees. *Statement of the Chairwoman and Ranking Member of the Committee on Ethics Regarding Representative John Duncan, Jr.*, House Committee on Ethics (Apr. 4, 2018), <https://ethics.house.gov/press-release/statement-chairwoman-and-ranking-member-committee-ethics-regarding-representative-jo-3>; *OCE Referral Regarding Rep. John J. Duncan Jr.*, Office of Congressional Ethics (Apr. 4, 2018), <https://oce.house.gov/reports/investigations/oce-referral-regarding-rep-john-j-duncan-jr>.

It remains within the power of the House Ethics Committee to enforce House rules regarding how members of Congress spend leadership PAC funds.

<sup>17</sup> 52 U.S.C. § 30114(b)(2)(D), 11 C.F.R. § 113.1(g)(1)(i)(G).

<sup>18</sup> Ken Silverstein, *Inside the Capitol Hill Club: Private “home away from home” for Republican lawmakers*, HARPER’S MAGAZINE (2008), <https://harpers.org/blog/2008/02/inside-the-capitol-hill-club-private-home-away-from-home-for-republican-lawmakers/>.

<sup>19</sup> Rachel Bade & Anna Palmer, *Hill Democrats denied alcohol when license lapsed*, POLITICO (2016), <https://www.politico.com/story/2016/05/national-democratic-club-liquor-license-222710>.

<sup>20</sup> 52 U.S.C. § 30114(b)(2)(H), 11 C.F.R. § 113.1(g)(1)(i)(F).

<sup>21</sup> See Jeff Barker, *Caves Valley Golf Club, Exclusive as Ever, Survived Changing Corporate Landscape*, BALTIMORE SUN (July 9, 2017), <http://www.baltimoresun.com/news/maryland/baltimore-county/bs-bz-caves-valley-golf-club-20170708-story.html>.

<sup>22</sup> 52 U.S.C. § 30114(b)(2)(I), 11 C.F.R. § 113.1(g)(1)(i)(G).

<sup>23</sup> 52 U.S.C. § 30114(b)(2)(B), 11 C.F.R. § 113.1(g)(1)(i)(C).

<sup>24</sup> The Allen Edmonds “apparel” expenditure was made via a reimbursement to Paul’s wife, Kelley Paul.

<sup>25</sup> 52 U.S.C. § 30114(b)(2)(H), 11 C.F.R. § 113.1(g)(1)(i)(F).

<sup>26</sup> Daniel Kreps, *Britney Spears Announces Final ‘Piece of Me’ Las Vegas Residency Shows*, ROLLING STONE (2017), <https://www.rollingstone.com/music/news/britney-spears-announces-final-piece-of-me-las-vegas-shows-w476059>.

<sup>27</sup> *2013 Academy of Country Music Award Events Announced! (2013)*, Academy of Country Music, [http://www.acmcountry.com/news?n\\_id=416](http://www.acmcountry.com/news?n_id=416) (last visited Mar 5, 2018).

<sup>28</sup> 52 U.S.C. §§ 30114(a), 30114(b)(1). Congress provided a non-exhaustive list of expenses that would constitute personal use, including the use of contributions for vacations, clothing purchases, country club memberships, and admission to sporting events. *Id.* § 30114(b)(2)(A)-(I). Contributions accepted by a candidate may be used by the candidate for, inter alia, “otherwise authorized expenditures in connection with the campaign for Federal office of the candidate,” 52 U.S.C. § 30114(a)(1), or for “ordinary and necessary expenses incurred in connection with duties of the individual as a holder of Federal office,” § 30114(a)(2), as well as for expressly permitted uses such as contributions to party committees, *id.* § 30114(a)(4), or candidates, *id.* § 30114(a)(5).

<sup>29</sup> 52 U.S.C. § 30104(i)(8)(B), 11 C.F.R. § 100.5(e)(6).

<sup>30</sup> 67 FR at 35672.

<sup>31</sup> 67 FR at 78754.

<sup>32</sup> Advisory Opinion 2008-17 (KITPAC), <https://www.fec.gov/files/legal/aos/2008-17/AO-2008-17-final.pdf>.

<sup>33</sup> See Advisory Opinion 2015-06 Draft A at 5, <https://www.fec.gov/files/legal/aos/2015-06/201506.pdf>.

<sup>34</sup> Advisory Opinion 2015-06 (Waters) at 3, [https://www.fec.gov/files/legal/aos/2015-06/AO-2015-06-\(Waters\)-Final--\(9.18.15\).pdf](https://www.fec.gov/files/legal/aos/2015-06/AO-2015-06-(Waters)-Final--(9.18.15).pdf).



### about Campaign Legal Center

Campaign Legal Center (“CLC”) is a nonpartisan, nonprofit organization based in Washington, D.C. Through litigation, policy analysis, and public education, CLC works to protect and strengthen the U.S. democratic process across all levels of government. CLC is adamantly nonpartisan, holding candidates and government officials accountable regardless of political affiliation.

CLC was founded in 2002 and is a recipient of the prestigious MacArthur Award for Creative and Effective Institutions. Our work today is more critical than ever as we fight the current threats to our democracy in the areas of campaign finance, voting rights, redistricting, and ethics. Learn more at [campaignlegal.org](http://campaignlegal.org).



### about Issue One

Issue One is a nonpartisan, nonprofit advocacy organization dedicated to political reform and government ethics in order to strengthen democracy and return government to the American people. Issue One's ReFormers Caucus of more than 200 former members of Congress, governors, and Cabinet secretaries from both parties is the largest coalition of its kind ever assembled to advocate for solutions to fix our democracy. Learn more at [issueone.org](http://issueone.org).

# appendix

This appendix includes illustrative examples of leadership PAC expenditures from January 2013 through March 2018. Whenever possible, through searches of news accounts and other public reports, efforts were made to determine and convey the context of particular expenditures. However, factors such as transaction dates distant from the underlying events, overly broad descriptions of expenditures' purposes, the secrecy under which many leadership PAC events operate, and the conflation of multiple categories of expenditures into a single line item on an FEC report limited our ability to tell a complete story of every expenditure.

The cases in each category below are ordered chronologically from most recent to least.

## luxury travel and lodging

### Las Vegas

Since 2013, politicians from across the country have used leadership PACs to spend hundreds of thousands of dollars at five-star hotels, luxury resorts, upscale restaurants, and entertainment venues in Las Vegas.

**Rep. Ann Wagner's (R-MO)** leadership PAC, Ann PAC, spent **\$21,831** from 2015 through 2017 for event expenses, lodging, catering, and travel at various locations in Las Vegas, including the Venetian/Palazzo Hotel and expenses from Tao Restaurant Vegas, an “unparalleled Asian-inspired restaurant” that is the sister to the “trendsetting” Tao in New York.<sup>1</sup> The payments to the Venetian/Palazzo in 2015 correspond with the Republican Jewish Coalition Spring Leadership Meeting.<sup>2</sup>

60.4% (\$134,500) of Ann PAC's spending in 2013-14 was for contributions, 40.6% (\$108,500) in 2015-16, and 36.2% (\$38,500) so far in 2017-18, according to the Center for Responsive Politics.<sup>3</sup>

**Rep. Gregory Meeks' (D-NY)** leadership PAC, Build America PAC, spent **\$27,372** from 2013-2017 on catering, lodging, and site rentals at the Aria Resort & Casino, which describes itself as “a AAA Five Diamond Award winning resort in the center of the Las Vegas Strip.”<sup>4</sup> The PAC also spent **\$6,244** in 2013 and 2015

on catering from Mastro's Ocean Club, a “top 10 steakhouse in the U.S.”<sup>5</sup>

16.2% (\$16,000) of Build America PAC's spending in the 2013-14 cycle was for contributions to candidates or political committees, 21.7% in 2015-16 (\$20,500), and 9.6% (\$7,000) in 2017-18 so far, according to the Center for Responsive Politics.<sup>6</sup>

**Rep. Devin Nunes' (R-CA)** leadership PAC, NEW PAC, has spent **\$42,741** since 2013 on catering, site rentals, hotels, and meals in Las Vegas. This includes **\$3,069** for food and room usage at Chart House, a high-end seafood restaurant with a 75,000-gallon exotic-fish aquarium centerpiece,<sup>7</sup> and **\$4,734** for food and room usage at Del Frisco's, a high-end steakhouse featuring an extensive wine list and a “unique James Bond Table.”<sup>8</sup> Most recently, in transactions all dated March 9, 2018, NEW PAC spent a total of **\$7,229** at seven different restaurants and hotels in Las Vegas.

58.1% (\$262,000) of New PAC's spending was for contributions to candidates or committees in the 2013-14 cycle, 54.0% (\$263,500) in 2015-16, and 51.2% (\$143,500) so far in 2017-18, according to the Center for Responsive Politics.<sup>9</sup>

## luxury hotels and resorts

Politicians have also used their leadership PACs to spend large sums at luxury hotels and resorts elsewhere in the country.

**Sen. Tom Carper's (D-DE)** leadership PAC, First State PAC, spent **\$36,520** from 2013 through 2016 on catering, lodging, and event expenses at the Park Hyatt Beaver Creek Resort and Spa and the Park Hyatt Beaver Creek hotel in Beaver Creek, Colorado. The Park Hyatt Beaver Creek Resort and Spa bills itself as a “luxury Colorado Resort where you can experience the vacation of your dreams. From breathtaking mountain views to championship golf courses to exquisite cuisine, our Beaver Creek ski resort offers the perfect year-round Vail Valley mountain escape.”<sup>10</sup>

43.0% (\$232,000) of First State PAC's spending was for contributions to candidates or political parties in 2013-14, 39.1% (\$225,000) in 2015-16, and 51.7% (\$145,000) in 2017-18, according to the Center for Responsive Politics.<sup>11</sup>

**Rep. Bob Goodlatte's (R-VA)** leadership PAC, Good Fund, has spent **\$326,181** since 2013 at The Omni Homestead Resort in Hot Springs, Virginia. This sum mostly comprised five large, roughly annual payments, all described simply as “fundraising event expense[s].”

55% (\$300,000) of Good Fund's spending was for contributions to candidates or political committees in the 2013-14 cycle, 51.6% (\$315,300) in the 2015-16 cycle, and 39.8% (\$99,900) was so far in the 2017-18 cycle, according to the Center for Responsive Politics.<sup>12</sup>

**Sen. John Thune's (R-SD)** leadership PAC, Heartland Values PAC, has paid the Greenbrier Sporting Club in West Virginia **\$403,003** for lodging, catering, meals, and event-related expenses since 2013. The PAC appears to have spent more than \$75,000 at the end of every summer for “PAC Event Lodging/Meals,” which seems to line up with the PAC's “Annual Greenbrier Family and Friends Weekend,” according to Political Party Time.<sup>13</sup> Additionally, the Greenbrier Sporting Club was the top single recipient of Heartland Values PAC's expenditures or contributions

in both the 2015-16 cycle<sup>14</sup> and the 2013-14 cycle.<sup>15</sup> In the 2013-14 cycle, in fact, the Greenbrier received almost *five times* as much as the National Republican Senate Committee received from Heartland Values PAC.<sup>16</sup>

Heartland Values PAC also spent **\$27,239** in 2014 and 2015 at the Cheyenne Ridge Signature Lodge in South Dakota. The pheasant-hunting lodge describes itself as “the only lodge in the state who offers guests unlimited pheasants” and was given the 2017 Sporting Classics Lodge of the Year award.<sup>17</sup>

35.4% (\$445,500) of Heartland Values PAC's spending was for contributions to candidates or political committees in the 2013-14 cycle, 42.1% (\$507,000) in 2015-16, and 24.6% (\$165,000) so far in 2017-18, according to the Center for Responsive Politics.<sup>18</sup>

**Rep. Richard Neal's (D-MA)** leadership PAC, Madison PAC, spent **\$183,106** from 2013-2017 on lodging and event expenses at Chatham Bars Inn, a Cape Cod hotel and winner of *Forbes'* prestigious Four-Star award, as well as a member of Travel & Leisure Magazine's “Leading Hotels of the World.”<sup>19</sup> According to Political Party Time, the PAC had a 2010 event titled “Summer Weekend on Cape Cod: Chatham Bars Inn.”<sup>20</sup>

20.5% (\$36,000) of Madison PAC's spending in the 2013-14 cycle was for contributions to candidates or political committees, 17.5% (\$29,500) in 2015-16, and 40.7% (\$75,500) so far in 2017-18, according to the Center for Responsive Politics.<sup>21</sup>

**Former Rep. Patrick J. Tiberi's (R-OH)** leadership PAC, Pioneer PAC, spent **\$43,585** from 2015 through 2016 on lodging, food and beverage, and event expenses at The Phoenician, a luxury resort in Scottsdale, Arizona. With rooms starting at \$400 per night, The Phoenician features “hotel suites, golf, spa, pools, dining and more” and offers “unparalleled service in a beautiful Arizona resort setting.”<sup>22</sup>

61.3% (\$592,200) of Pioneer PAC's spending in the 2013-14 cycle was for contributions to candidates or political committees, 51.1% (\$528,045) in 2015-16, and 60.8% (\$238,500) so far in 2017-

18, according to the Center for Responsive Politics.<sup>23</sup>

**Former Rep. Thomas Reynolds (R-NY)** left Congress in 2009, but his leadership PAC, Together for Our Majority PAC (TOM PAC), has spent at least **\$22,518** at the Inn at Spanish Bay, a coastal resort in Pebble Beach, California, since 2013. “Nestled among majestic Monterey pines — and fronted by a Scottish-style links golf course that touches some of the most breathtaking coastline in the world — The Inn at Spanish Bay is an idyllic retreat,” boasts its website.<sup>24</sup>

41.6% (\$8,300) of TOM PAC’s spending was for contributions to candidates or political committees in the 2013-14 cycle, 31.6% (\$12,500) in 2015-16, and 48.3% (\$17,750) so far in 2017-18, according to the Center for Responsive Politics.<sup>25</sup>

**Former Rep. John Barrow (D-GA)** left office in 2015, but his leadership PAC, DAWG PAC (Democrats Against Waste in Government), spent **\$34,036** in a single payment on October 21, 2014, for “Generic Fundraising Event Expenses” at the Sea Island resort on the Georgia coast. The resort’s website boasts that it’s “the only resort in the world to receive four Forbes Five-Stars nine years in a row.”<sup>26</sup>

57.2% (\$124,600) of DAWG PAC’s spending was for contributions to candidates or political committees in the 2013-14 cycle, 27.8% (\$6,300) in 2015-16, and 96.9% (\$23,800) so far in 2017-18, according to the Center for Responsive Politics.<sup>27</sup>

## international travel

A number of politicians have used their leadership PACs to pay thousands of dollars to vendors outside the United States. PACs must report the addresses of the vendors they pay, but they often report international expenditures with “YY,” “ZZ,” or nothing in the “state” field. That is how the examples in this section were identified.

**Sen. Rand Paul’s (R-KY)** leadership PAC, Reinventing a New Direction (RAND PAC), spent **\$11,043** at restaurants in Italy and Malta in 2017 and an additional **\$20,501**

in 2017 on expenses coded as “travel” paid to vendors based outside the United States, including to British Airways. These 2017 expenditures included **\$4,492** to the Rome Shuttle Limousine in Rome, Italy, in August 2017, and **\$1,904** to the St. George Lycabettus Hotel in Athens in August and September of 2017.<sup>28</sup> This 5-star hotel advertises “breathtaking panoramic views over Athens to the Acropolis and the Saronic Gulf beyond” and boasts that it was awarded “Best Rooftop View Hotel” at the World Luxury Hotel Awards in 2017.<sup>29</sup>

2017 was not the first year RAND PAC spent funds overseas. In January 2013, RAND PAC also spent **\$1,597** at the Alrov Mamilla Hotel in Jerusalem.

And, in the fall of 2014, RAND PAC also made the following expenditures in Guatemala, likely associated with Paul’s trip to perform pro bono eye surgeries:<sup>30</sup>

- **\$310** to St. Domingo Taxi;
- **\$1,244** at Hotel Casa Santo Domingo;
- **\$789** at Hotel Clarion Suites; and
- **\$1,903** at Inversiones Hasa, which is accompanied by neither a street address nor a stated purpose on the PAC’s FEC filing.

In the 2013-14 cycle, 6.6% (\$237,100) of RAND PAC’s spending was for contributions to candidates or political committees; in the 2015-16 cycle, it was 5.6% (\$64,600); in the 2017-18 cycle so far, it is 15.6% (\$125,500), according to the Center for Responsive Politics.<sup>31</sup>

**Former Rep. William Delahunt (D-MA)** left office in 2011,<sup>32</sup> but his leadership PAC (Campaign for Change) spent **\$2,418** on food, transportation, parking, and lodging at the Hotel Tamanaco Caracas in Venezuela in April and May of 2014. Campaign for Change filed a termination report in July 2015.<sup>33</sup> Delahunt worked on U.S.-Venezuela relations as a congressman,<sup>34</sup> and he has traveled at other times to Venezuela since leaving office, such as when he attended Hugo Chavez’s funeral in the spring of 2013.<sup>35</sup>

30.6% of Campaign for Change’s spending was for contributions to candidates or

political committees in the 2013-14 cycle (\$192,149), and 15.1% (\$12,500) in the 2015-16 cycle, according to the Center for Responsive Politics,<sup>36</sup> before terminating its FEC registration in July 2015.

## Disney getaways

The average Disney vacation costs a family around \$6,360,<sup>37</sup> but politicians get to experience the happiest place on earth for free — or more specifically, on their leadership PAC donor's dime. Five-star hotels, upscale dining, NASCAR driving, and deluxe bowling are some of the ways in which politicians use leadership PAC funds to subsidize events that often look an awful lot like vacations.

All together, leadership PACs have spent at least **\$469,000** on Walt Disney hotels, theme parks, restaurants, entertainment activities, and more since 2013. Examples of particular expenditures are listed below.

**Rep. Sean P. Duffy's (R-WI)** leadership PAC, Ax PAC, has spent **\$54,683** since 2014 for travel, event venue rentals, and catering through Disney Resort and Disney's Grand Floridian Resort & Spa, including **\$4,956** in 2014 for event venue and catering at 1900 Park Fare, a breakfast and dinner buffet hosted by various Disney characters.<sup>38</sup> As recently as February and March 2018, Ax PAC made three expenditures totaling **\$6,818** — all reported as simply "travel" expenditures — to Disney Resort.

56.8% (\$54,700) of Ax PAC's spending in the 2013-14 cycle was for contributions to candidates or political committees, 36.0% (\$64,000) in 2015-16, and 39.9% (\$93,000) so far in 2017-18, according to the Center for Responsive Politics.<sup>39</sup>

**Rep. Debbie Wasserman Schultz's (D-FL)** leadership PAC, Democrats Win Seats (DWS PAC), spent **\$16,991** in 2013 for fundraising events, rooms, and catering at the Walt Disney World Swan Hotel.<sup>40</sup>

47.4% (\$1.1 million) of DWS PAC's spending was for contributions to candidates or political committees in the 2013-14 cycle, 30.1% (\$353,000) in 2015-16, and 3.9% (\$11,000) so far in 2017-18, according to the Center for Responsive Politics.<sup>41</sup>

**Rep. Ileana Ros-Lehtinen's (R-FL)** leadership PAC, IRL PAC, spent **\$3,983** in 2017 for meals, lodging, and park tickets at Walt Disney World Dolphin Hotel,<sup>42</sup> Disney's Boardwalk Inn, and the restaurant Chef Art Smith's Homecomin' in Disney Springs.

55.6% (\$38,000) of IRL PAC's 2013-14 spending was for contributions to candidates or political committees, 67.9% (\$65,500) in 2015-16, and 42.3% (\$31,200) so far in the 2017-18 cycle, according to the Center for Responsive Politics.<sup>43</sup>

**Former Sen. David Vitter's (R-LA)** leadership PAC, Louisiana Reform PAC, spent **\$35,431** in 2013 and 2014 at various Disney locations, including Walt Disney World, the Walt Disney World Swan Hotel, Restaurant Marrakesh in Walt Disney World, Disney's Richard Petty Driving Experience (an "authentic NASCAR entertainment," it advertises<sup>44</sup>), and the Four Seasons Resort Orlando at Walt Disney Resort. According to Political Party Time, Louisiana Reform PAC has held an "Annual Vitter Disney Weekend."<sup>45</sup> In 2014, for the "4th Annual Vitter Disney Weekend", the activities included Disney's Hoop-Dee-Doop BBQ and Musical Revue, a private breakfast with "your favorite Disney characters," and a day of golf with Sen. Vitter.

In 2013, potentially in connection with the 3rd Annual Vitter Disney Weekend, fundraising entertainment costing **\$1,828** was spent at the former Richard Petty Driving Experience, a speedway for driving NASCAR cars as well as taking part in the "exotic-car experience," driving Ferraris, Lamborghinis, and Porsches.<sup>46</sup>

The day after the 4th Annual Weekend, in November 2014, the PAC spent **\$464** on food from Restaurant Marrakesh, a Moroccan food buffet decorated as a sultan's palace that offers live belly dancing and music.<sup>47</sup>

26.3% (\$55,400) of Louisiana Reform PAC's spending in the 2013-14 cycle was



for contributions to candidates or political committees, 17.4% (\$23,500) in 2015-16, and 0% so far in 2017-18, according to the Center for Responsive Politics.<sup>48</sup> The PAC has not filed a termination report with the FEC.<sup>49</sup>

**Sen. Bill Nelson's (D-FL) leadership PAC, Moving America Forward PAC, spent \$23,497 from 2015 through 2017 on expenses described as fundraising, catering, and site reservation through Walt Disney World. (It also spent \$15,095 in 2016 and 2018 at Universal Orlando Resort in Florida; in January 2018, the PAC paid Universal Orlando Resort \$10,016 for a "fundraising event.")**

58.5% (\$228,000) of Moving America Forward PAC's spending was for contributions to candidates or political committees in the 2013-14 cycle, 49.0% (\$213,500) in the 2015-16 cycle, and 43.8% (\$158,000) in the 2017-18 cycle so far, according to the Center for Responsive Politics.<sup>50</sup>

**Sen. John Kennedy's (R-LA) leadership PAC, Pelican PAC, spent \$14,346 in the summer of 2017 on fundraising catering and room rental through Disney Destinations.**

10.3% (\$5,000) of Pelican PAC's spending in the 2017-18 cycle so far has been for contributions to other candidates or committees, according to the Center for Responsive Politics.<sup>51</sup> The PAC did not register with the FEC until March 2017.<sup>52</sup>

**Sen. Roy Blunt's (R-MO) leadership PAC, Rely on Your Beliefs Fund, has spent \$117,083 since 2013 on primarily event catering, lodging, travel, and facility rentals at Disney's Yacht Club Resort in Florida, "a grand New England-style yacht club at this lakeside hotel."<sup>53</sup> According to Political Party Time, the leadership PAC hosted a "Family Retreat to Disney's Beach Club Resort" there in 2013.<sup>54</sup>**

43.2% (\$559,300) of Rely on Your Beliefs Fund's spending was for contributions to candidates or political committees in the 2013-14 cycle, 63.1% (\$552,500) in 2015-16, and 21.7% (\$160,000) so far in 2017-18, according to the Center for Responsive Politics.<sup>55</sup>

## golf and country clubs

Overall, current and former members of Congress have used their leadership PACs to spend at least **\$871,000** explicitly on golf-related activities. Many politicians use their leadership PACs to return to the same clubs year after year to hit the links, and some use them to pay country club dues.

Pebble Beach, on the Northern California coast, is one popular golf destination for leadership PACs' golfing activities. For example, **Rep. Hal Rogers' (R-KY) leadership PAC, Help America's Leaders PAC (HALPAC), has paid \$70,317 to the Pebble Beach Company, which manages Pebble Beach Resorts, including the golf courses, hotels, and restaurants.**

46.0% (\$232,500) of HALPAC's spending was for contributions to candidates or political committees in the 2013-14 cycle, 38.1% (\$239,500) in 2015-16, and 29.0% (\$71,500) so far in 2017-18, according to the Center for Responsive Politics.<sup>56</sup>

*60 Minutes'* leadership PAC exposé from October 2013 highlighted that **Sen. Saxby Chambliss' (R-GA) leadership PAC, Republican Majority Fund, had spent \$100,000 at golf clubs.<sup>57</sup> Our review of Republican Majority Fund's reports shows the PAC continued spending tens of thousands of dollars more at golf clubs after the piece aired. For example, the PAC spent \$9,193 for "PAC Event/Golf/Banquet/Lodging/Trav" on March 5, 2014, at Pebble Beach, and also spent another \$9,083 at other golf clubs in late 2013 and early 2014.**

54.8% (\$265,500) of Republican Majority Fund's spending in 2013-14 was for contributions to candidates or political committees, but that percentage has steeply declined since then: in 2015-16, it was only 29.2% (\$116,500), and 25.3% (\$102,000) so far in 2017-18, according to the Center for Responsive Politics.<sup>58</sup> More than three years after Chambliss left office, Republican Majority Fund still has not yet filed a termination report with the FEC.<sup>59</sup>

Some politicians return to the same country club year after year on their leadership PAC

dime for regular golf events. For example, in the summers of 2014, 2015, and 2016, **former Sen. Barbara Mikulski's (D-MD)** leadership PAC, Building a Majority PAC (BAMPAC), spent a total of **\$31,073** on three “golf tournament[s]” at the Whiskey Creek Golf Club in Maryland.<sup>60</sup>

In the past, Mikulski has held annual golf tournament fundraisers at the Whiskey Creek Golf Club; for example, Political Party Time acquired an invitation for a Whiskey Creek Golf Club fundraiser benefiting Mikulski for Senate in 2013.

44.1% (\$140,000) of BAMPAC's spending was for contributions to candidates or political committees in the 2013-14 cycle, 23.8% (\$70,000) in the 2015-16 cycle, and 8.4% (\$2,000) in the 2017-18 cycle, according to the Center for Responsive Politics.<sup>61</sup> BAMPAC filed a termination report with the FEC in May 2017.<sup>62</sup>

Since 2013, **Sen. Johnny Isakson's (R-GA)** leadership PAC, 21st Century Majority Fund, has spent **\$252,740** on 13 golfing events at the Bandon Dunes Golf Resort on the Oregon coast; **\$81,075** on four golfing events at the Atlanta Country Club in Georgia; and **\$58,735** on four golfing events at East Lake Golf Club in Atlanta, Georgia.

49.1% (\$394,800) of 21st Century Majority Fund's spending in the 2013-14 cycle was for contributions to candidates or political committees, 48.3% (\$356,300) in 2015-16, and 18.9% (\$105,000) so far in 2017-18, according to the Center for Responsive Politics.<sup>63</sup>

**Rep. Pete Sessions' (R-TX)** leadership PAC, People for Enterprise Trade and Economic Growth (PETE PAC), spent **\$21,240** on “membership for P. Sessions” at the Caves Valley Golf Club in January 2017. Caves Valley reportedly charges **\$20,000** in annual membership dues.<sup>64</sup> In January 2018, PETE PAC paid Caves Valley Golf Club **\$19,956**, but described the purpose of the payment as “golf event for PAC fundraising event, not for individual candidate,” rather than for membership dues.

44.8% (\$303,000) of PETE PAC's spending was for contributions to candidates or political

committees in the 2013-14 cycle, 49.8% (\$214,100) in 2015-16, and 30.3% (\$83,000) so far in the 2017-18 cycle, according to the Center for Responsive Politics.<sup>65</sup>

## sporting event tickets

Politicians often use leadership PACs to pay for tickets to sporting events, theater shows, music awards ceremonies, and other activities. While it is difficult to ascertain who attends each event and the exact dates the underlying events took place, FEC data allow a glimpse into the activities that officeholders and candidates are engaging in on leadership PAC campaign funds.

The information in this section was found by searching for the term “ticket” in our FEC records. The amounts listed are only for the price of the tickets purchased, unless otherwise noted. This means that the amount spent for catering, concessions, travel, and lodging relating to the event is not included. The dates listed correspond to the time in which the event tickets were purchased, not when the event took place. Some sports arenas host concerts as well as their sporting events, but they are listed as sporting events due to the inability to know exactly what the tickets were for. Noteworthy tickets are listed in this section, but it is not a comprehensive list of all tickets purchased by leadership PACs.

If possible, event ticket purchases were cross-referenced with Political Party Time, a website that chronicles political fundraising events.

### baseball

**Sen. Sherrod Brown's (D-OH)** leadership PAC, America Works PAC, has purchased **\$55,765** worth of tickets from the Cleveland Indians Baseball Company since 2013.

53.6% (\$382,000) of America Works PAC's spending in the 2013-14 cycle was for contributions to candidates or political committees, 57.9% (\$651,500) in 2015-16, and 57.9% (\$307,500) in 2017-18 so far, according to the Center for Responsive Politics.<sup>66</sup>

**Sen. John Thune's (R-SD) leadership PAC, Heartland Values PAC, spent \$1,006 in June 2017 on tickets to a LA Dodgers game. The previous month, the PAC had bought \$215 worth of "Baseball Jerseys" from the Dodgers. Thune is a longtime Dodgers fan.<sup>67</sup>**

As noted above, 35.4% (\$445,500) of Heartland Values PAC's spending was for contributions to candidates or political committees in the 2013-14 cycle, 42.1% (\$507,000) in 2015-16, and 24.6% (\$165,000) so far in 2017-18, according to the Center for Responsive Politics.<sup>68</sup>

## **basketball**

**Heartland Values PAC also spent \$10,585 in 2017 on tickets to the Sioux Falls Arena in South Dakota. The arena is home to the Augustana University Vikings men's and women's basketball games.<sup>69</sup> In March of 2018, Heartland Values PAC paid off a credit card bill that included a \$4,000 payment for "PAC Event Tickets" to the Denny Sanford Premier Center, an indoor arena in Sioux Falls, South Dakota. This payment may have been for tickets to the 2018 Summit League Basketball Championships, which were held at the Center March 3-6, 2018.<sup>70</sup>**

As noted above, 35.4% (\$445,500) of Heartland Values PAC's spending was for contributions to candidates or political committees in the 2013-14 cycle, 42.1% (\$507,000) in 2015-16, and 24.6% (\$165,000) so far in 2017-18, according to the Center for Responsive Politics.<sup>71</sup>

**Former Sen. Al Franken's (D-MN) leadership PAC, Midwest Values PAC, spent \$3,615 on tickets in November 2017 for an event at the TD Boston Garden, home of the NBA's Boston Celtics, the NHL's Boston Bruins, and various concerts.<sup>72</sup>**

38.2% (\$277,600) of Midwest Values PAC's spending was for contributions to candidates or political committees in the 2013-14 cycle, 31.2% (\$852,000) in 2015-16, and 23.2% (\$347,000) so far in 2017-18, according to the Center for Responsive Politics.<sup>73</sup>

**Rep. Devin Nunes' (R-CA) leadership PAC, NEW PAC, spent a total of \$14,638 on tickets to the TD Boston Garden over the course of three occasions in 2017.**

As noted above, 58.1% (\$262,000) of New PAC's spending was for contributions to candidates or committees in the 2013-14 cycle, 54.0% (\$263,500) in 2015-16, and 51.2% (\$143,500) so far in 2017-18, according to the Center for Responsive Politics.<sup>74</sup>

## **football**

**Former Rep. Patrick J. Tiberi's (R-OH) leadership PAC, Pioneer PAC, spent \$11,143 in early 2015 on tickets to the Mercedes-Benz Superdome, which may have been for the 2015 Sugar Bowl, played between the Ohio State Buckeyes and the Alabama Crimson Tide on January 1, 2015.<sup>75</sup>**

As noted above, 61.3% (\$592,200) of Pioneer PAC's spending in the 2013-14 cycle was for contributions to candidates or political committees, 51.1% (\$528,045) in 2015-16, and 60.8% (\$238,500) so far in 2017-18, according to the Center for Responsive Politics.<sup>76</sup>

**Rep. Mike Doyle's (D-PA) leadership PAC, the Keystone Fund, spent \$4,680 in January 2018 on tickets through Steelers Ticketing.**

86.8% (\$97,500) of Keystone Fund's spending was for contributions to candidates or political committees in the 2013-14 cycle, 49.0% (\$64,200) in the 2015-16 cycle, and 35.2% (\$27,500) so far in the 2017-18 cycle, according to the Center for Responsive Politics.<sup>77</sup>

## **horse races**

**Rep. Andy Barr's (R-KY) leadership PAC, Building America's Republican Representation, spent \$18,654 in December 2015 on tickets from Breeders' Cup Limited, host of the Breeders' Cup World Championships, a two-day horse race,<sup>78</sup> which in 2015 was held in Keeneland Race Track in Lexington, Kentucky.<sup>79</sup> *The Lexington Herald-Leader* reported in 2016:**

“Over the last year, U.S. Rep. Andy Barr, R-Lexington, [used leadership PAC funds to spend] nearly \$32,000 on tickets to the Kentucky Derby and Breeders’ Cup, plus \$300 to hire handicapper Ellis Starr to provide betting tips for his racetrack guests. ‘Nobody was even talking politics. It was just entertainment for everyone,’ Starr recently recalled.”<sup>80</sup>

As noted above, 56.4% (\$102,500) of Building America’s Republican Representation’s spending was for contributions to candidates or political committees in the 2015-16 cycle, and 64.6% (\$101,500) so far in the 2017-18 cycle, according to the Center for Responsive Politics.<sup>81</sup> The PAC did not form until January 2015.<sup>82</sup>

**Rep. Hal Rogers’ (R-KY)** leadership PAC, Help America’s Leaders PAC (HALPAC), spent **\$86,616** from 2013 through 2016 on tickets to Churchill Downs, outside Rogers’ district, a horse racing track in Louisville, Kentucky, most famous for hosting the Kentucky Derby.<sup>83</sup>

As mentioned above, 46.0% (\$232,500) of HALPAC’s spending was for contributions to candidates or political committees in the 2013-14 cycle, 38.1% (\$239,500) in 2015-16, and 29.0% (\$71,500) so far in 2017-18, according to the Center for Responsive Politics.<sup>84</sup>

## shows

### theater

**Sen. Martin Heinrich’s (D-NM)** leadership PAC, Lobo PAC, spent **\$7,236** from 2014-2016 on tickets to the Santa Fe Opera in New Mexico. The Santa Fe Opera hosted many different shows during this time period, including *Fidelio*, *The Nightingale*, *Don Giovanni*, and *Romeo et Juliette*.<sup>85</sup>

62.2% (\$349,800) of Lobo PAC’s spending in the 2013-14 cycle was for contributions to candidates or political committees, 57.3% (\$329,500) in the 2015-16 cycle, and 43.8% (\$169,050) so far in the 2017-18 cycle, according to the Center for Responsive Politics.<sup>86</sup>

**Former Rep. Patrick J. Tiberi’s (R-OH)** leadership PAC, Pioneer PAC, has spent at least **\$64,000** on Broadway shows in New York City since 2013. These expenditures have comprised:

- A total of **\$23,310** to Broadway Inbound, a company that sells group Broadway tickets.<sup>87</sup>
- **\$6,318** in 2013 for *Kinky Boots* tickets (together with food and beverage payments) to the Al Hirschfeld Theatre in New York City.<sup>88</sup>
- **\$5,036** in 2013 for tickets at the Shubert Theatre in New York City, likely to see *Matilda the Musical*.<sup>89</sup>
- **\$3,403** in 2014 for tickets to the New Amsterdam Theatre in New York City. The theatre has been hosting *Aladdin* since 2014.<sup>90</sup>
- **\$3,964** in 2014 for tickets to the Walter Kerr Theatre in New York City. The theatre was showing *A Gentleman’s Guide to Love and Murder* from November 2013 through January 2016.<sup>91</sup>
- **\$8,190** in September 2014 for tickets to the Gerald Schoenfeld Theatre in New York City. The Gerald Schoenfeld Theatre was showing *It’s Only a Play*, starring Matthew Broderick and Nathan Lane, from October 2014-January 2015.<sup>92</sup> *The Audience*, starring Helen Mirren, played from March 2015 through June 2015.<sup>93</sup>
- **\$822** in December 2014 at the Broadway Theater in New York City.
- **\$3,249** in July 2015 for tickets to the Lunt-Fontanne Theatre in New York City. The theatre was showing *Finding Neverland* from April 2015 through August 2016.<sup>94</sup>
- **\$8,867** in 2014 and 2015 for tickets to the Palace Theatre in New York City. The theatre was showing *An American in Paris* from April 2015 through October 2016.<sup>95</sup>
- **\$593** in January 2016 at the Barrymore Theater in New York City.
- **\$763** in March 2017 to Ticketmaster, at the same address as the Lyric Theater in New York City.

As noted above, 61.3% (\$592,200) of Pioneer PAC’s overall spending in the 2013-14 cycle was for contributions to candidates or political

committees, 51.1% (\$528,045) in 2015-16, and 60.8% (\$238,500) so far in 2017-18, according to the Center for Responsive Politics.<sup>96</sup>

**Rep. Ed Royce's (R-CA)** leadership PAC, Road to Freedom PAC, spent **\$1,090** in December 2017 for tickets to the Lunt-Fontanne Theatre in New York City, **\$2,280** in November 2014 at the Gerald Schoenfeld Theater in New York City, and **\$700** in December 2015 on tickets to the Palace Theater in New York City.

44.7% (\$148,000) of Road to Freedom PAC's spending in the 2013-14 cycle was for contributions to candidates or political committees, 48.2% (\$212,000) in 2015-16, and 33.0% (\$74,000) so far in 2017-18, according to the Center for Responsive Politics.<sup>97</sup>

## music

**Sen. John Cornyn's (R-TX)** leadership PAC, Alamo PAC, spent **\$19,114** on May 3, 2017, on "event tickets" from iHeartRadio, which hosts an annual award ceremony and various concert events. According to Political Party Time, the PAC held a fundraiser titled "Country Music Festival Weekend in Support of Alamo PAC" on May 5-6, 2017, in Austin, Texas.<sup>98</sup> iHeartRadio hosted the iHeartCountry Festival in Austin, Texas, on May 6, 2017.<sup>99</sup> On March 27, 2018, Alamo PAC paid another **\$18,590** for "event tickets" from iHeart Media.

52.4% (\$646,200) of Alamo PAC's spending was for contributions to candidates or political committees in the 2013-14 cycle, but only 38.4% (\$725,600) in the 2015-16 cycle, and 16.3% (\$110,000) so far in the 2017-18 cycle, according to the Center for Responsive Politics.<sup>100</sup>

**Former Rep. Aaron Schock's (R-IL)** leadership PAC, GOP Generation Y Fund, spent **\$3,320** on April 10, 2013, on tickets from the Academy of Country Music, which hosts events such as their annual Academy of Country Music Awards, held in 2013 on April 7.<sup>101</sup>

As noted above, 70.3% (\$522,100) of GOP Generation Y Fund PAC's spending was for contributions to candidates or political committees in 2013-14, 3.0% (\$1,500) in 2015-16, and 0% in 2017-18 so far,

according to the Center for Responsive Politics.<sup>102</sup>

**Former Sen. Harry Reid's (D-NV)** leadership PAC, Searchlight Leadership Fund, spent **\$4,897** in April 2014 on tickets from Planet Hollywood in Las Vegas. Planet Hollywood hosted the *Britney: Piece of Me* concert residency of Britney Spears from December 2013 through December 2017.<sup>103</sup>

63.9% (\$1.1 million) of Searchlight Leadership PAC's spending in the 2013-14 cycle was for contributions to candidates or political committees, 24.5% (\$299,500) in 2015-16, and 38.7% (\$45,300) so far in 2017-18, according to the Center for Responsive Politics.<sup>104</sup>

**Rep. John B. Larson's (D-CT)** leadership PAC, Synergy PAC, spent **\$7,430** in October 2014 on tickets to the Infinity Hall Hartford, which hosts many different concerts.<sup>105</sup>

53.0% (\$225,000) of Synergy PAC's spending in the 2013-14 cycle was for contributions to candidates or political committees, 46.5% (\$138,500) in the 2015-16 cycle, and 27.4% (\$59,500) in the 2017-18 cycle, according to the Center for Responsive Politics.<sup>106</sup>

## wine, cigars, hunting, and more

**Sen. Ron Wyden's (D-OR)** leadership PAC, Holding Onto Oregon's Priorities, paid Grape Escape Winery Tour in Oregon **\$1,973** in 2014 and 2015, including **\$380** explicitly for a "wine tour" in August 2014.

78.7% (\$521,000) of Holding Onto Oregon's Priorities PAC's spending in the 2013-14 cycle was for contributions to candidates or political committees, 58.0% (\$406,500) in 2015-16, and 56.5% (\$287,000) so far in 2017-18, according to the Center for Responsive Politics.<sup>107</sup>

**Sen. John Cornyn's (R-TX)** leadership PAC, Alamo PAC, spent **\$111** on a "hunting license" in April 2015, paid to the Virginia Department of Game and Inland Fishery.

As noted above, 52.4% (\$646,200) of Alamo PAC's spending was for contributions to candidates or political committees in the

2013-14 cycle, but only 38.4% (\$725,600) in the 2015-16 cycle, and 16.3% (\$110,000) so far in the 2017-18 cycle, according to the Center for Responsive Politics.<sup>108</sup>

**House Majority Leader Kevin McCarthy's (R-CA) leadership PAC, Majority Committee PAC, paid \$734 in November 2017 for "books" to Israel Seminar in Tel Aviv, which describes itself as "a full service travel company dedicated to designing and directing luxury travel experiences throughout Israel."**<sup>109</sup>

49.8% (\$1.3 million) of Majority Committee PAC spending in 2013-14 was for contributions to candidates or political committees, 68.7% (\$2.3 million) in 2015-16, and 75.2% (\$1.9 million) in 2017-18 so far, according to the Center for Responsive Politics.<sup>110</sup>

**Former Rep. Mary Bono Mack's (R-CA) leadership PAC, Mary's PAC, spent \$10,000 in August 2013 on membership dues to CXIII Rex, a private cigar club in Alexandria, VA.**<sup>111</sup>

10.3% (\$3,000) of Mary's PAC's contributions was for contributions to candidates or political committees in the 2013-14 cycle, and 0% in the 2015-16 cycle, according to the Center for Responsive Politics.<sup>112</sup> The PAC filed a termination report with the FEC in January 2015.<sup>113</sup>

**Rep. Paul Cook's (R-CA) leadership PAC, Semper Fi, spent \$375 in March 2016 on membership dues to the NRA.**

52.3% (\$21,200) of Semper Fi spending was for contributions to candidates or political committees in the 2013-14 cycle, 49.2% (\$35,600) in 2015-16, and 47.9% (\$20,500) so far in 2017-18, according to the Center for Responsive Politics.<sup>114</sup>

**Sen. Rand Paul's (R-KY) leadership PAC, RAND PAC, spent \$337 on "apparel" at a Men's Warehouse in Omaha, Nebraska, in September 2014, and \$438 on "apparel" at the men's shoe store Allen Edmonds on Madison Avenue in New York City.**<sup>115</sup> RAND PAC also spent **\$201** at TJ Maxx on "travel luggage" in March 2015, spent **\$1,575** total at BLT Prime, the restaurant in the Trump Hotel, in 2017, and spent **\$407** total at the Trump Golf Club in Virginia in 2017.

As noted above, in the 2013-14 cycle, 6.6% (\$237,100) of RAND PAC's spending was for contributions to candidates or political committees; in the 2015-16 cycle, it was 5.6% (\$64,600); in the 2017-18 cycle so far, it was 15.6% (\$125,500), according to the Center for Responsive Politics.<sup>116</sup>

## family member payments

**Former Rep. Ron Paul (R-KY) left office at the beginning of 2013, but from 2013 through 2015, his daughter Lori Pyeatt, also the PAC's treasurer, received \$48,186 in salary payments from his leadership PAC, Liberty PAC.**

16.8% (\$41,500) of Liberty PAC's spending in the 2013-14 cycle was for contributions to candidates or political committees, and 0% in 2015-16, according to the Center for Responsive Politics.<sup>117</sup> The PAC filed a termination report with the FEC in January 2016.<sup>118</sup>

**Rep. Hal Rogers' (R-KY) leadership PAC, Help America's Leaders PAC (HALPAC), paid Cynthia Rogers, Hal Rogers' wife, approximately monthly payments for "PAC event planning" and "PAC event planning services" that totaled \$22,000 in 2016.**<sup>119</sup>

As noted above, 46.0% (\$232,500) of HALPAC's spending was for contributions to candidates or political committees in the 2013-14 cycle, 38.1% (\$239,500) in 2015-16, and 29.0% (\$71,500) so far in 2017-18, according to the Center for Responsive Politics.<sup>120</sup>

## appendix endnotes

- <sup>1</sup> TAO LAS VEGAS, <https://www.taolasvegas.com/restaurant/> (last visited Mar 1, 2018).
- <sup>2</sup> *RJC Leadership Meeting*, NEVADA REPUBLICAN PARTY, <http://nevadagop.org/event/rjc-leadership-meeting/> (last visited Mar 1, 2018).
- <sup>3</sup> OpenSecrets, *Ann PAC: Expenditures*, CENTER FOR RESPONSIVE POLITICS, <https://www.opensecrets.org/pacs/expenditures.php?cmte=C00531764&cycle=2014> (last visited June 13, 2018).
- <sup>4</sup> Aria Resort & Casino, About, FACEBOOK, <https://www.facebook.com/pg/ARIA/about> (last visited June 13, 2018). Meeks held a fundraiser at Aria in 2014. See Isabel Vincent & Melissa Klein, *Gregory Meeks travels the globe on taxpayers' dime: watchdog*, NEW YORK POST (Sept. 13, 2015), <https://nypost.com/2015/09/13/gregory-meeks-travels-the-globe-on-taxpayers-dime-watchdog/>.
- <sup>5</sup> *About Us*, MASTRO'S RESTAURANTS, <https://www.mastrosrestaurants.com/Mastros-Company-Info/About-Mastros/> (last visited Mar 1, 2018).
- <sup>6</sup> OpenSecrets, *Build America PAC: Expenditures*, CENTER FOR RESPONSIVE POLITICS, <https://www.opensecrets.org/pacs/expenditures.php?cycle=2018&cmte=C00377143> (last visited June 13, 2018).
- <sup>7</sup> CHART HOUSE, <http://www.chart-house.com/locations/las-vegas/> (last visited May 23, 2018).
- <sup>8</sup> DEL FRISCO'S, <https://delfriscos.com/steakhouse/las-vegas/> (last visited May 23, 2018).
- <sup>9</sup> OpenSecrets, *NEW PAC: Expenditures*, CENTER FOR RESPONSIVE POLITICS, <https://www.opensecrets.org/pacs/expenditures.php?cmte=C00398750&cycle=2014> (last visited June 13, 2018).
- <sup>10</sup> *Park Hyatt Beaver Creek Resort and Spa*, HYATT, <https://beavercreek.park.hyatt.com/en/hotel/home.html> (last visited Mar 1, 2018).
- <sup>11</sup> OpenSecrets, *First State PAC: Expenditures*, CENTER FOR RESPONSIVE POLITICS, <https://www.opensecrets.org/pacs/expenditures.php?cmte=C00363648&cycle=2014> (last visited June 13, 2018).
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<sup>90</sup> *History*, NEW AMSTERDAM THEATRE, <http://newamsterdamtheatre.com/history.html> (last visited Mar. 5, 2018).

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- <sup>118</sup> Liberty PAC, Termination Report, FEC Form 3X, at 1 (filed Jan. 12, 2016), <http://docquery.fec.gov/pdf/546/201601129004475546/201601129004475546.pdf>.
- <sup>119</sup> As noted previously, after 2016, the FEC no longer classified HALPAC as a leadership PAC. Therefore, this sum does not include data from the 2017-18 cycle.
- <sup>120</sup> OpenSecrets, *Helping America's Leaders: Expenditures*, CENTER FOR RESPONSIVE POLITICS, <https://www.opensecrets.org/pacs/expenditures.php?cmte=C00376038&cycle=2014> (last visited June 13, 2018).