



October 4, 2023

Ronald D. Moalli
Senior Investigator
The Florida Commission on Ethics
P.O. Box 15709
Tallahassee, Florida 32317

Sent via E-Mail (Moalli.ron@leg.state.fl.us)

Dear Mr. Moalli:

We write to provide additional information related to Campaign Legal Center's ("CLC") complaint against Governor Ron DeSantis, dated July 6, 2023, Complaint No. 23-158 (the "Complaint").¹ Specifically, we requested that the Florida Commission on Ethics investigate whether Governor DeSantis violated Florida state law by failing to report free air travel he received in February 2023. Recent reporting revealed that there are apparently at least eight additional gifts of free air travel that then Governor-Elect DeSantis received in 2018, which we request are added to the investigation.²

As detailed in the Complaint, Florida law requires government officials to report any travel gifts in excess of \$100. Gifts are defined as "that which is accepted by a donee . . . or that which is paid or given to another for or on behalf of a donee, directly, indirectly . . . or by any other means, for which equal or greater consideration is not given within 90 days, including . . . transportation, other than that provided to a public officer or employee by an agency in relation to officially approved governmental business."³

Despite this disclosure requirement, *The Washington Post* identified multiple flights Gov. DeSantis took that appear unrelated to officially approved governmental business and

¹ Governor Ron DeSantis Unreported Travel Complaint, Campaign Legal Center (July 6, 2023), <https://campaignlegal.org/sites/default/files/2023-07/CLC%20Complaint%20-%20to%20FL%20Commission%20on%20Ethics.pdf> (attached as Exhibit 1).

² Isaac Arnsdorf and Josh Dawsey, *DeSantis took undisclosed private flights and lodging through wealthy donors*, *Washington Post* (Sept. 14, 2023), <https://www.washingtonpost.com/politics/2023/09/14/ron-desantis-private-flights/> (Attached as Exhibit 2).

³ Fla. Stat. 112.312(12)(a)(7) (2022).

were not reported as political contributions.⁴ This suggests that the transportation should have been reported as a gift.

Gov. DeSantis' Undisclosed Private Flights⁵

Flight Date	Itinerary	Plane Owner
November 2018	Tallahassee, FL—St. Augustine, FL	TVPX Aircraft Solutions
December 2018	St. Augustine, FL—Walterboro, SC	Mori Hosseini
December 2018	Walterboro, SC—Augusta, GA	Mori Hosseini
December 2018	Augusta, GA—St. Augustine, FL	Mori Hosseini
November/December 2018	Unknown	John Cwik
November/December 2018	Unknown	John Cwik
November/December 2018	Unknown	John Cwik
November/December 2018	Unknown	John Cwik
February 2023	Tallahassee, FL—Newark, NJ	Jeffrey Soffer
February 2023	Staten Island, NY—Philadelphia, PA	Charles Whittall
February 2023	Philadelphia, PA—Chicago, IL	Charles Whittall
February 2023	Chicago, IL—Tallahassee, FL	Charles Whittall
March 2023	Unknown—Cobb County, GA	Entity connected to Waffle House

In 2018, Gov. DeSantis accepted flights for a golf trip on a plane owned by Mori Hosseini.⁶ Mr. Hosseini, Gov. DeSantis, then-state Senate president Bill Galvano, and an adviser first flew to Walterboro, where they played golf at the Congaree Golf Club.⁷ They then flew to Augusta to play golf at the Augusta National Golf Club, before returning home.⁸ Notably, Mr. Hosseini is a top political donor to Gov. DeSantis, as well as a housing developer in Florida, who sought a highway interchange project to which the DeSantis administration allocated \$92 million in state funding. During the same year, Gov. DeSantis

⁴ Arnsdorf and Dawsey, *supra* note 2.

⁵ *Id.*; Alexandra Berzon and Rebecca Davis O'Brien, *Air DeSantis: The Private Jets and Secret Donors Flying Him Around*, N.Y. Times (May 20, 2023; updated May 25, 2023), <https://www.nytimes.com/2023/05/20/us/politics/desantis-private-jets-donors.html>.

⁶ Arnsdorf and Dawsey, *supra* note 2.

⁷ *Id.*

⁸ *Id.*

traveled on a plane registered to John Cwik, another political donor to Gov. DeSantis who is the CEO of a window manufacturer in Ocala, Florida.⁹

In February 2023, Gov. DeSantis accepted multiple flights just before he announced that he was running for president. First, Gov. DeSantis used Jeffrey Soffer's plane to fly to Newark so that he could attend a meet-and-greet with police officers on Staten Island.¹⁰ Jeffrey Soffer is a hotelier who has hired lobbyists to change a state law that would allow him to offer gambling in his Miami Beach resort.¹¹

Gov. DeSantis then used a plane registered to a company run by Charles Whittall to travel to Philadelphia to give a speech, to Chicago to speak to the Knights of Columbus, and then home to Tallahassee. Charles Whittall is an Orlando developer who gave \$25,000 to Gov. DeSantis in 2021.¹²

In conclusion, the publicly available information suggests that Gov. DeSantis was required to file a gift statement with the Florida Commission on Ethics describing these travel gifts. Failing to do so is a violation of Section 112.3148(8)(a) of the Florida Statutes. CLC respectfully requests that the Florida Commission on Ethics review these trips in addition to the 2023 travel gifts Gov. DeSantis and determine whether he violated Florida ethics law.

Respectfully,

_____/s/_____
Kedric L. Payne
General Counsel, Vice President, and Sr.
Director, Ethics

_____/s/_____
Danielle Caputo
Legal Counsel, Ethics

⁹ *Id.*

¹⁰ Berzon and Davis O'Brien, *supra* note 5.

¹¹ *Id.*

¹² *Id.*

Exhibit 1

Exhibit 2