



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").<sup>1</sup> 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.<sup>2</sup>

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."<sup>3</sup>

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

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<sup>1</sup> 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).

<sup>2</sup> 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).

<sup>3</sup> Fla. Stat. 112.312(12)(a)(7) (2022).

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

**Gov. DeSantis' Undisclosed Private Flights<sup>5</sup>**

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.<sup>6</sup> 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.<sup>7</sup> They then flew to Augusta to play golf at the Augusta National Golf Club, before returning home.<sup>8</sup> 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

<sup>4</sup> Arnsdorf and Dawsey, *supra* note 2.

<sup>5</sup> *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>.

<sup>6</sup> Arnsdorf and Dawsey, *supra* note 2.

<sup>7</sup> *Id.*

<sup>8</sup> *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.<sup>9</sup>

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.<sup>10</sup> 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.<sup>11</sup>

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.<sup>12</sup>

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

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<sup>9</sup> *Id.*

<sup>10</sup> Berzon and Davis O'Brien, *supra* note 5.

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

<sup>12</sup> *Id.*

## Exhibit 1



July 6, 2023

Chair John Grant  
Vice Chair Glenton Gilzean, Jr.  
The Florida Commission on Ethics  
P.O. Box 15709  
Tallahassee, Florida 32317

*Sent via U.S. Priority Mail*

Dear Chair Grant and Vice Chair Gilzean:

Campaign Legal Center (“CLC”) respectfully requests that the Florida Commission on Ethics investigate whether Governor Ron DeSantis violated Florida state law by failing to report free air travel arranged by And To The Republic (“ATTR”). Specifically, recent reporting by *The New York Times* confirmed that ATTR organized nearly a dozen speaking events in at least eight states in February 2023, and arranged air travel for Gov. DeSantis to these events, including one event where Gov. DeSantis traveled on a jet owned by Miami Beach hotelier, Jeffrey Soffer.<sup>1</sup>

Florida public officials are required to report travel gifts because Floridians have a right to know that their officials are acting in the public’s interest, not their own personal interest, or the interests of those who provide gifts. Gift disclosures inform Floridians of who could be influencing their officials. Therefore, it is necessary for the Florida Commission on Ethics to investigate whether Governor DeSantis accepted undisclosed travel gifts.

**I. Florida Government Officials Are Required to Report Any Travel Gifts in Excess of \$100**

Florida law defines a gift 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

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<sup>1</sup> Alexandra Berzon & 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> (Attached as Exhibit A).

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.”<sup>2</sup>

Under Section 112.3148(8)(a) of the Florida Statutes, each reporting individual is required to “file a statement with the Commission on Ethics not later than the last day of each calendar quarter, for the previous calendar quarter, containing a list of gifts which he or she believes to be in excess of \$100 in value.” “Reporting individual” is defined “pursuant to s. 8 Art. II of the State Constitution,” which includes the governor.<sup>3</sup>

The statement must include “a description of the gift, the monetary value of the gift, the name and address of the person making the gift, and the dates thereof. If any of these facts, other than the gift description, are unknown or not applicable, the report shall so state.”<sup>4</sup>

## **II. ATTR Acknowledged Arranging Free Air Travel for Gov. DeSantis**

Gov. DeSantis’s travel to at least eight states was arranged for by ATTR, according to the nonprofit’s executive director, Tori Sachs. *The New York Times* reported that “Ms. Sachs and a person involved in Mr. DeSantis’s recent travel said they did not consider the trips political contributions or gifts.”<sup>5</sup> However, the free transportation was not reported as political contributions, which suggests that the transportation was a gift.

No publicly available evidence suggests that the trips Gov. DeSantis took were related to officially approved governmental business. ATTR acknowledged that it paid for or gave travel on private jets to Gov. DeSantis on behalf of individuals such as Mr. Soffer, which Gov. DeSantis does not appear to have repaid. Based on these facts, Gov. DeSantis’s free air travel is a gift under Florida law.

## **III. Gov. DeSantis Does Not Appear to Have Reported the Free Air Travel He Received from ATTR**

Gov. DeSantis was required to file a gift statement with the Florida Commission on Ethics “not later than the last day” of the calendar quarter, which was Friday, June 30, 2023. This statement should have covered gifts received during the prior calendar quarter, which includes the air travel that occurred in February 2023. While we do not know the exact cost of the flights Gov. DeSantis received, it is not unreasonable to assume the private jets cost over \$100, which would require him to report the travel gifts. The Florida Commission on Ethics’ website does not have such a statement from Gov. DeSantis as of July 5, 2023. Failure to file the statement by June 30, 2023 is a violation of Section 112.3148(8)(a) of the Florida Statutes.

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<sup>2</sup> Fla. Stat. 112.312(12)(a)(7) (2022).

<sup>3</sup> Fla. Const. Art. II §8 (a).

<sup>4</sup> Fla. Stat. 112.3148(5)(b) (2022).

<sup>5</sup> Berzon & Davis O’Brien, *supra* note 1.

#### **IV. Conclusion**

The facts suggest that Gov. DeSantis violated Section 112.3148(8)(a) of the Florida Statutes by failing to file a statement with the Florida Commission on Ethics regarding the travel gift he received from ATTR. As such, CLC respectfully requests that the Florida Commission on Ethics enforce Florida law by reviewing whether Gov. DeSantis did in fact fail to submit the statement detailing the travel gifts from ATTR.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_  
Kedric L. Payne  
Vice President, General Counsel  
and  
Senior Director, Ethics

\_\_\_\_\_/s/\_\_\_\_\_  
Danielle Caputo  
Legal Counsel, Ethics

## Exhibit A



## Air DeSantis: The Private Jets and Secret Donors Flying Him Around

As the Florida governor hoppedscotched the country preparing to run for president, a Michigan nonprofit paid the bills. It won't say where it got the money.



By Alexandra Berzon and Rebecca Davis O'Brien

Alexandra Berzon and Rebecca Davis O'Brien examined campaign finance reports, flight tracking databases and corporate records for this article.

Published May 20, 2023 Updated May 25, 2023

For Ron DeSantis, Sunday, Feb. 19, was the start of another busy week of not officially running for president.

That night, he left Tallahassee on a Florida hotelier's private jet, heading to Newark before a meet-and-greet with police officers on Staten Island on Monday morning. Next, he boarded a twin-jet Bombardier to get to a speech in the Philadelphia suburbs, before flying to a Knights of Columbus hall outside Chicago, and then home to his day job as governor of Florida.

The tour and others like it were made possible by the convenience of private air travel — and by the largess of wealthy and in some cases secret donors footing the bill.

As he prepared for his White House bid, Mr. DeSantis relied heavily on his rich allies to ferry him around the country to test his message and raise his profile. Many of these donors are familiar boosters from Florida, some with business interests before the state, according to a New York Times review of Mr. DeSantis's travel. Others have been shielded from the public by a new nonprofit, The Times found, in an arrangement that drew criticism from ethics experts.

Mr. DeSantis, who formally announced his candidacy on Wednesday, is hardly the first politician to take advantage of the speed and comfort of a Gulfstream jet. Candidates and officeholders in both parties have long accepted the benefits of a donor's plane as worth the political risk of appearing indebted to special interests or out of touch with voters.

But ethics experts said the travel — and specifically the role of the nonprofit — shows how Mr. DeSantis's prolonged candidate-in-limbo status allowed him to work around rules intended to keep donors from wielding secret influence. As a declared federal candidate, he faces far stricter requirements for accepting and reporting such donations.



Mr. DeSantis has been traveling the country testing his message. He and his wife, Casey DeSantis, met this month with local Republicans in Cedar Rapids, Iowa. Haiyun Jiang/The New York Times

“Voters deserve this information because they have a right to know who is trying to influence their elected officials and whether their leaders are prioritizing public good over the interests of their big-money benefactors,” said Trevor Potter, the president of Campaign Legal Center and a Republican who led the Federal Election Commission. “Governor DeSantis, whether he intends to run for president or not, should be clearly and fully disclosing who is providing support to his political efforts.”

Representatives for the governor's office and for Mr. DeSantis's political operation declined to comment or provide details about who has arranged and paid for his flights.

Mr. DeSantis has aggressively navigated his state's ethics and campaign finance laws to avoid flying commercial. And he has gone to new lengths to prevent transparency: He recently signed a bill making travel records held by law enforcement, dating back to the beginning of his term, exempt from public records requests.

Mr. DeSantis is still required to report contributions and expenses in his campaign finance records, but the new law probably prevents law enforcement agencies from releasing more details, such as itineraries, flight information or even lists of visitors to the governor's mansion. (Mr. DeSantis says he is trying to address a security concern.)

In February, Mr. DeSantis traveled to Newark on a jet owned by Jeffrey Soffer, a prominent hotel owner who, according to several lawmakers and lobbyists, has sought a change in state law that would allow him to expand gambling to his Miami Beach resort.

The February trip and others were arranged by And To The Republic, a Michigan-based nonprofit, according to Tori Sachs, its executive director. The nonprofit formed in late January as Mr. DeSantis was beginning to test the national waters and quickly became a critical part of his warm-up campaign. It organized nearly a dozen speaking events featuring the governor in at least eight states.

Ms. Sachs would not say how much was spent on the flights or who paid for them.

### Navigating the Loopholes

It is unclear how Mr. DeSantis will account for the trips arranged by the nonprofit without running afoul of state ethics laws. Florida generally bars officeholders from accepting gifts from lobbyists or people, like Mr. Soffer, whose companies employ lobbyists — unless those gifts are considered political contributions.

But both Ms. Sachs and a person involved in Mr. DeSantis's recent travel said they did not consider the trips political contributions or gifts. The person was not authorized to discuss the matter and spoke on condition of anonymity. The group's practice "is to provide transportation for special guests," Ms. Sachs said, "in full compliance with the law."

Florida ethics rules, however, give politicians plenty of loopholes. In some circumstances, for example, officeholders can accept paid travel to give speeches as part of their official duties. The state ethics commission has also allowed officeholders to accept gifts from lobbyists if they are channeled through third-party groups.

Since taking office in 2019, Mr. DeSantis, who has worked in public service most of his career and reported a net worth of \$319,000 last year, has steadily leaned on others to pick up the tab for private flights.

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**How Times reporters cover politics.** Times journalists may vote, but they are not allowed to endorse or campaign for candidates or political causes. That includes participating in rallies and donating money to a candidate or cause.

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His political committee has accepted private air travel from roughly 55 wealthy, mostly Florida-based contributors and companies associated with them, including the heads of oil and gas companies, developers and homebuilders, and health care and insurance executives, a Times analysis of campaign finance records shows.

Additional travel donations were routed to the Republican Party of Florida, which Mr. DeSantis often used as a third-party pass-through.

A half dozen lobbyists and donors who spoke with The Times said they became accustomed to calls from the governor's political aides asking for planes — in at least one case, for a last-minute trip home from out of state and, more recently, for a flight to Japan.

The Japan trip, which was part of an overseas tour that gave Mr. DeSantis a chance to show off his foreign policy chops, was considered part of the governor's official duties and was organized in part by Enterprise Florida, a public-private business development group. But Mr. DeSantis's office would not disclose how it was paid for or how he traveled. Enterprise Florida did not respond to requests for comment.



DeSantis supporters at his election-night event last year, as he coasted to re-election.  
Scott McIntyre for The New York Times

Mr. DeSantis's office rarely releases information about nonofficial events. (In February, when he traveled to four states in one day, his public schedule simply read, "No scheduled events.") And Mr. DeSantis has brushed off past criticism of his travel. In 2019, The South Florida Sun Sentinel revealed a previous flight to New York on a plane owned by Mr. Soffer. Mr. DeSantis said he had followed proper procedures.

"It's all legal, ethical, no issues there," he told reporters.

A spokeswoman for Mr. Soffer declined to comment.

### **The Warm-Up Campaign**

Soon after winning re-election in November, the governor turned to building his national profile. He began traveling the country to visit with Republican activists, dine with donors, speak at events and promote a new book, "The Courage to Be Free: Florida's Blueprint for America's Revival."

Some of his travel was paid for by Friends of Ron DeSantis, a Florida political committee that supported his campaign for governor and reports its donors. The committee had more than \$80 million on hand as recently as last month — money that is expected to be transferred to a federal super PAC supporting his presidential run.

Since November, that committee has received 17 contributions for political travel from nine donors. They include Maximo Alvarez, an oil and gas distributor, and Morteza Hosseini, a Florida homebuilder who has frequently lent his plane to the governor and has become a close ally.

But trips paid for by the nonprofit group, And To The Republic, do not appear in state records.

The group is registered as a social welfare organization under Section 501(c)(4) of the federal tax code, meaning its primary activity cannot be related to political campaigns. Other prospective and official presidential candidates also have relationships to similar organizations, often called dark money groups because they are not required to disclose their donors.

The nonprofit's founder, Ms. Sachs, said it was formed to promote "state policy solutions that are setting the agenda for the country" and described Mr. DeSantis as one of the first elected officials to "partner" with the group. Another of those officials, Gov. Kim Reynolds of Iowa, has appeared at the group's events in her home state — alongside Mr. DeSantis.

And To The Republic has hosted Mr. DeSantis at events in South Carolina, Nevada and Iowa, all key early primary states. Some of those events were promoted as "The Florida Blueprint," borrowing from Mr. DeSantis's book title.

The arrangement has made tracking Mr. DeSantis's travel — and its costs — difficult. The Times and other news outlets used public flight trackers to verify the governor's use of Mr. Soffer's plane, which was first reported by Politico.

Other trips arranged by the group include the Feb. 20 stops outside Philadelphia and Chicago and the return trip to Tallahassee, on which Mr. DeSantis flew on a plane registered to a company run by Charles Whittall, an Orlando developer. Mr. Whittall, who gave \$25,000 to Mr. DeSantis's political committee in 2021, said that he uses a leasing company to rent out his aircraft, and that he did not provide it as a political contribution.

In March, he traveled to Cobb County, Ga., on a plane owned by an entity connected to Waffle House, the Georgia-based restaurant chain. The company did not respond to a request for comment.

Other potential DeSantis rivals have made headlines for their use of private jets. Both as South Carolina governor and as ambassador to the United Nations, Nikki Haley faced criticism for flying on private planes owned by wealthy South Carolinians.

In 2020, The Associated Press reported that donors gave hundreds of thousands of dollars in private air travel to Donald J. Trump's fundraising committee. The donors included Ben Pogue, a Texas businessman whose father later received a presidential pardon.

Still, Mr. Trump — who owns his own plane — has repeatedly sought to draw attention to Mr. DeSantis's travel, claiming the private planes were effectively campaign contributions and “Ron DeSantis is a full-time candidate for president.”

Shane Goldmacher and Michael C. Bender contributed reporting. Kitty Bennett and Sheelagh McNeill contributed research.

***A correction was made on May 22, 2023: An earlier version of this article characterized incorrectly Ron DeSantis's career. He has worked in public service nearly his entire career, but not his entire career.***

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When we learn of a mistake, we acknowledge it with a correction. If you spot an error, please let us know at [nytnews@nytimes.com](mailto:nytnews@nytimes.com). [Learn more](#)

Alexandra Berzon is a Pulitzer Prize-winning investigative reporter for the Politics desk, focused on elections systems and voting. She was previously an investigative reporter for The Wall Street Journal and covered the gambling industry and workplace safety. [@alexandraberzon](#)

Rebecca Davis O'Brien covers campaign finance and money in U.S. elections. She previously worked for The Wall Street Journal, where she was part of a team that won the 2019 Pulitzer Prize in National Reporting. [@rebeccadobrien](#)

A version of this article appears in print on , Section A, Page 1 of the New York edition with the headline: Donors Help DeSantis Stay Frequent Flier

## Exhibit 2

## DeSantis took undisclosed private flights and lodging through wealthy donors

The trips included a private flight to the prestigious home of the Masters tournament, with an overnight stay and a round of golf

By [Isaac Arnsdorf](#) and [Josh Dawsey](#)

September 14, 2023 at 5:00 a.m. EDT

Florida Gov. [Ron DeSantis](#) took at least six undisclosed trips on private jets and accepted lodging and dining in late 2018, according to flight manifests, tracking data and other documents obtained by The Washington Post that reflect his proclivity for luxury travel and leisure time with wealthy donors.

The trips came during the period between DeSantis's election and inauguration as governor. On one, DeSantis traveled to the prestigious Augusta National Golf Club on a plane owned by Mori Hosseini, a major home builder who [supplied a golf simulator](#) in the governor's mansion and [later benefited](#) from \$92 million in federal pandemic funding that the DeSantis administration steered to a highway interchange project he sought. DeSantis took four other flights on a plane that was registered at the time to John Cwik, another DeSantis donor, records show.

DeSantis did not report the flights or accommodations as gifts or campaign contributions and it's unclear whether he used a separate legal option to personally reimburse for the flights at the cost of coach airfare. A DeSantis spokesman said he complied with regulations but declined to specify how the costs of the trips were paid or how they met ethics and disclosure requirements.

His then-campaign lawyer wrote in a memo to his transition team that as governor-elect, he was "required to report with the Ethics Commission all direct and indirect gifts accepted that are worth over \$100," including "transportation," "lodging" and "food." Paid travel for political purposes was required to be disclosed as an in-kind campaign contribution, lawyer Ben Gibson advised in the 17-page memo.

Costs that are reimbursed are not considered gifts and do not have to be reported, Gibson's memo explained. Ethics Commission rules allow private jet trips to be paid back at the cost of a coach ticket on the same route, rather than the actual operating cost of the flight, which is typically many times higher. This provision could have allowed DeSantis, who is [not personally wealthy](#), to ride on donors' planes for a fraction of the cost, all while avoiding any public scrutiny.

“All travel and events you mention — from almost five years ago — were compliant and received proper payment,” the DeSantis campaign spokesman, Andrew Romeo, said. “Efforts to fundraise for state political parties and cultivate relationships with state officials are standard for political leaders, especially during an election year.”

The undisclosed trips, which have not been previously reported, reflect how DeSantis fueled his political rise through close bonds with rich patrons and had a taste for luxury travel, in contrast to his campaign’s portrayal of DeSantis’s humble blue-collar roots and aversion to moneyed interests. His preference for private jet travel has continued into his White House bid, even as his campaign has struggled to rein in spending. In an unusual arrangement, the campaign is sharing some costs for private plane travel with the super PAC supporting him.

Romeo called this story “Trump-legacy media collusion” and claimed DeSantis has the best chance to defeat President Biden. “Ron DeSantis has always fought back against the establishment and won, and this election will be no different,” Romeo said.

“Additional questions regarding events, itineraries and documentation from almost five years ago should be directed to Susie Wiles, the staffer who oversaw such matters prior to her dismissal,” he continued.

Wiles, a top Republican operative in Florida, was the head of DeSantis’s transition team in late 2018. She was publicly ousted from his political operation in 2019 and is now a top adviser to Trump. Wiles referred questions to the Trump campaign.

“The DeSantis campaign’s ridiculous statement doesn’t even merit a response,” Trump campaign spokesman Steven Cheung said. “Instead of pointing fingers and trying to place blame on others — like they have historically done — the DeSantis’ should take a good, hard look in the mirror to better understand why they chose to act unethically and sell access to their office.”

DeSantis has not filed any gift disclosures throughout his time in office, according to the Florida Ethics Commission. The commission has received 12 complaints about DeSantis, all of which were dismissed. None were relevant to the undisclosed trips.

Searches of state campaign finance disclosures by DeSantis’s campaign, his affiliated political action committee and the Florida Republican Party did not produce any records of donations or expenditures corresponding to the private flights documented in the records obtained by The Post. In other instances later in his administration, DeSantis’s private flights were disclosed as in-kind contributions to his PAC or the state GOP. The state GOP did not respond to a request for comment.

The state disclosure requirement contains an exception for some relatives but not for friends. The Ethics Commission has repeatedly determined that free flights on private planes count as gifts, according to Caroline Klancke, a former commission general counsel and deputy executive director. State law provides penalties including fines of \$10,000 per violation of the gift rules and Klancke said DeSantis’s actions could prompt further scrutiny.

While state rules generally value gifts at the “actual cost to the donor,” they allow the value of private jet travel to be “given the same value as an unrestricted coach fare.” Valuing lodging and golf rounds that are not generally available to the public would be more complicated, Klancke said.

“It’s always hard when there’s golf involved. These gift issues are very complex,” Klancke said. She added that the situation could receive further scrutiny from the Ethics Commission: “Were they given for the purpose of influencing the public official or engendering goodwill? These are things that go to the fabric of the fairness of the government.”

DeSantis’s willingness to accept perks after being elected troubled some of his advisers at the time, who feared that he would run afoul of the state’s ethics laws, according to multiple people familiar with the situation. The Gibson memo was written partially to explain to DeSantis exactly what he could and could not do, according to people with knowledge of the document, who like others interviewed for this story spoke on the condition of anonymity for fear of retaliation. The memo also warned against taking gifts from those seeking to curry favor with the incoming governor.

“Public officers are prohibited from soliciting or accepting anything of value, such as a gift, loan, reward, promise of future employment, favor or service that is based on an understanding that their vote, official action or judgment would be influenced by such gift,” the memo said. “Public officers and employees are prohibited from corruptly using or attempting to use their official positions or the resources thereof to obtain a special privilege or benefit for themselves or others.”

Gibson, who remains a top Tallahassee lawyer for Florida Republicans, did not respond to requests for comment.

The Post reviewed travel documents in 2018 showing a governor-elect who showed a penchant for private plane travel and maintained close relationships with wealthy donors and other associates. After taking office, DeSantis was frequently given the use of planes by influential Floridians and others, records show. His team was often seeking out supporters who could provide planes, according to former advisers and a list of potential donors who could be asked to provide planes that was obtained by The Post, a practice that is allowed and ordinarily subject to disclosure requirements.

The trip to Augusta National Golf Club occurred on Dec. 20 and 21, 2018. A private jet registered to one of Hosseini’s companies took off from Daytona, where Hosseini and the plane are based, and flew to Sarasota to pick up then-state Senate President Bill Galvano, according to an itinerary prepared by DeSantis’s team and plane-tracking data. Gift or campaign finance disclosures for Galvano from the trip could not be found.

Hosseini did not respond to specific questions about the Augusta trip but said he had always acted “legally.” A spokeswoman for Galvano declined to say how the trip complied with ethics rules. “Any and all travel I did during my time as Senate President to raise support for the Republican Party of Florida was always done in accordance with Florida law and part of the job,” Galvano said in a statement.

From Sarasota, Hosseini’s jet proceeded to St. Augustine, near where DeSantis was living at the time, to pick him up along with an adviser and two state bodyguards, according to the documents.



The plane next flew to Walterboro, S.C., where DeSantis's security team brought the group to the Congaree Golf Club for a round between Hosseini, DeSantis, Galvano and the adviser, according to the itinerary. Ground transportation was provided by DeSantis's security team, according to the itinerary. Two people familiar with the trip said the security team consisted of state officers.

The Florida Department of Law Enforcement, which protects the governor and the governor-elect, declined to comment.

In South Carolina, the group returned to the airport to fly to Augusta, Ga., according to the itinerary and flight data. There, DeSantis and Hosseini were picked up by Fred Ridley, a Tampa-based lawyer and chairman of the Augusta National Golf Club, according to the itinerary. The Florida security officers followed them in a separate vehicle, according to the itinerary.

The advisers and bodyguards were not allowed to follow DeSantis, Hosseini, Galvano and Ridley into the club, the itinerary said. A person familiar with the trip confirmed that the guards were not allowed to trail DeSantis on the course — and sometimes were left off other courses, or at high-end homes where he stayed. Ridley did not respond to a request for comment.

Augusta National boasts an exclusive membership list that includes some of the world's most powerful people and hosts the annual Masters tournament, widely regarded as the most prestigious golf competition. The itinerary noted that DeSantis needed to wear a jacket and tie for dinner and would stay the night in the club's Eisenhower room, a cabin built for the 34th president, Dwight D. Eisenhower, who was a club member, and marked with the presidential seal above the door. The meal and lodging also do not appear in disclosures for gifts, contributions or expenditures either.

DeSantis, Hosseini, Ridley and Galvano played the next day, according to the itinerary, and then Hosseini's plane flew the governor-elect back to St. Augustine.

DeSantis returned to Augusta for the Masters in 2019 and 2021, according to photographs of him at the event. It was not clear how those trips were paid for; there were no disclosures of the travel costs as gifts or political activity, according to The Post's review of ethics and campaign finance disclosures. Romeo declined to comment on how those trips complied with the law.

DeSantis's love of golf has been one recurring way for lobbyists and donors to spend time with him in exchange for campaign contributions. When he became governor, he approved a plan that involved attempting to "sell" appointments with DeSantis at a course he enjoyed in Tallahassee, according to documents reviewed by The Post.

In 2021, DeSantis named Ridley to the University of Florida Board of Trustees and reappointed Hosseini, who has made substantial campaign contributions to benefit DeSantis in Florida, as the board's chairman. Companies he controls gave \$1 million to the super PAC supporting DeSantis's White House bid this year.

After DeSantis was reelected last year, his administration directed \$92 million in covid relief funds to build a controversial highway interchange that would directly benefit one of Hosseini's development projects. "With or without the interchange, we would have built Woodhaven there, but it certainly helps," Hosseini told a local newspaper of the project in 2019. Hosseini denied seeking any special favors. DeSantis's office referred questions to the state Department of Transportation, which did not directly respond to questions about DeSantis's or Hosseini's involvement in the decision to fund the project.

Hosseini sent a lengthy document to The Post on Tuesday that showed discussions about the interchange dating back to 1998, well before DeSantis was in office. But the documents also show that questions were raised about the viability and wisdom of the project over the years.

"I or my company have never ever asked for anything from this governor or any other previous governors," he said in an email to The Post.

Flight manifests, itineraries and tracking data showed four other flights DeSantis took in November and December of 2018 on a plane that was registered at the time to John Cwik, another DeSantis political donor who is the CEO of a window manufacturer in Ocala, Fla. Those flights also did not appear in any campaign finance disclosures. Cwik said he did not know how the flights were paid for because the arrangements were made through a chartering company called Rennia Aviation. A search of Florida political expenditures did not return any disclosures for payments to that company. The company did not respond to requests for comment.

"I tried to give it to him one day at a fundraiser and he said 'I can't do that,'" Cwik said of offering to let DeSantis use his plane free.

In another trip documented in a flight manifest and plane-tracking data reviewed by The Post, DeSantis flew between Tallahassee and St. Augustine on Nov. 15, 2018, on a plane that was registered to a Utah-based company called TVPX Aircraft Solutions. The company's website says it provides Federal Aviation Administration registration services for foreign entities and other clients that do not meet ownership requirements or want higher privacy protection. The company did not respond to requests for comment.