

**BEFORE THE  
FEDERAL ELECTION COMMISSION**

Jesse James Watts  
7730 Tamara Drive  
Reno, NV 89506

Complainant,

v.

David Flippo for Nevada  
Thomas Datwyler, Treasurer  
355 E Plumb Lane, #1157  
Reno, NV 89502

Respondents

---

**COMPLAINT**

This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that David Flippo for Nevada (FEC ID: C00901710), the authorized campaign committee of David Flippo, a candidate for Nevada's 2nd Congressional District, and its treasurer Thomas Datwyler (collectively, the "Respondents"), have violated the Federal Election Campaign Act ("FECA"), 52 U.S.C. § 30101, et seq., by (1) making unlawful expenditures of campaign funds for personal living expenses in violation of 52 U.S.C. § 30114(b) and 11 C.F.R. § 113.1(g)(1)(i)(H).

**FACTS**

**I. The Candidate's Residency Background**

David Flippo is a candidate for the open seat in Nevada's 2nd Congressional District ("CD2"), with the Republican primary scheduled for June 9, 2026. CD2 encompasses Reno, Sparks, Carson City, Elko, Winnemucca, and much of rural northern and central Nevada.

Prior to filing for CD2, Flippo was a registered resident of Las Vegas, Nevada — located in southern Nevada's 4th Congressional District ("CD4"). Public records reflect that Flippo originally filed to run in CD4 before switching to CD2 following Congressman Mark Amodei's retirement announcement. On April 16, 2026, Flippo was unable to attend a CD2 candidate forum in Fallon, Nevada because he was in Las Vegas attending President Trump's "No Tax on Tips" roundtable at the AC Hotel in Symphony Park. Flippo sent Woodrow Johnston, a paid campaign consultant employed through Revere Solutions, to speak on his behalf at the Fallon forum. When an attendee asked Johnston where Flippo lives, Johnston answered: "Reno."

## **II. The Rental Arrangement and Campaign Disbursements**

Federal Election Commission disbursement records for Flippo for Nevada reflect three payments, all dated March 30, 2026, to a Reno-area real estate company categorized as "RENT." The three payments are as follows:

- \$1,416.94
- \$4,222.59
- \$5,046.51

These three disbursements total \$10,686.04. The payee — Blue Sierra Realty Nevada — specializes in fully furnished luxury short-term and corporate rentals in the Reno area. The property at 3400 Southampton Drive, Reno, Nevada 89509 — a six-bedroom fully furnished home — is listed on Zillow at a rental price of \$8,000 per month. The property was publicly advertised on Blue Sierra Realty Nevada's Instagram account ([instagram.com/bluesierrarealtynevada](https://www.instagram.com/bluesierrarealtynevada)) with distinctive architectural features including large angled windows, glass block wall elements, and specific furnished interior pieces, along with a panoramic city view. The Instagram post lists the property address as 3400 Southampton Drive, Reno, NV 89509 and describes it as a fully furnished six-bedroom home available for corporate leasing and relocation.

## **III. Voter Registration at the Rental Address**

Voter registration records further illuminate the residency pattern. As of September 11, 2018, Flippo registered to vote in Clark County, Nevada. As of March 9, 2026, Flippo

remained registered at 8256 Garnet Canyon Lane, Las Vegas, Nevada, his Clark County address of record. As of that same date, his wife, his son, and his son's wife were also all registered at the same Garnet Canyon Lane address, indicating that the family's established domicile remained in Las Vegas as of that date. By April 2, 2026, the Nevada statewide voter registration database no longer reflected active registrations for Flippo or his son, while his wife and daughter-in-law remained registered at the Garnet Canyon Lane address in Clark County. Flippo's registration subsequently appears in Washoe County records at 3400 Southhampton Drive, Reno, Nevada 89509 — the address of the campaign-funded rental property — though the precise date of that re-registration is not known to the Complainant at this time. The fact that Flippo's wife remains registered at the family's Las Vegas address is consistent with that address remaining the family's actual domicile. The Commission's investigative authority would permit verification of the exact re-registration date through Washoe County and Clark County election records.<sup>1</sup>

#### **IV. Public Statements Claiming Personal Residency**

On April 1, 2026, at an endorsement interview before the Washoe County Republican Assembly, Flippo was asked directly where his house was located. He responded: "Uh, right here in Reno." When asked when he purchased it, he stated: "This week." When asked to confirm his statement, he replied: "I'm, we're moving up here" — present tense — indicating that as of the date of the interview, his relocation to Reno was ongoing and had not been completed.

On April 26, 2026, Flippo hosted a public campaign event which his campaign advertised as "Cookout at the Lt. Colonel's House," expressly inviting voters to "Come join Lt. Colonel Flippo and the Flippo Team at his house in Reno, Nevada." Over 100 people attended. Following the event, Flippo posted publicly on campaign social media accounts stating: "Yesterday's meet and greet at my home in Reno was incredible."

Photographs published by the campaign in connection with this event depict the same distinctive interior architectural features — including the large angled windows, glass block wall, furnishings, and panoramic view — that appear in the rental company's own social media listing for 3400 Southhampton Drive, Reno, Nevada 89509.

## LEGAL ANALYSIS

### I. Prohibition on Personal Use of Campaign Funds

Under FECA, a candidate's campaign committee is prohibited from converting campaign funds to personal use. 52 U.S.C. § 30114(b). The FEC's regulations establish two independent bases for finding personal use. First, 11 C.F.R. § 113.1(g)(1)(i) sets forth a per se list of expenses that constitute personal use as a matter of law, regardless of any other analysis. That list expressly includes rent or mortgage payments for any part of any personal residence of the candidate or a member of the candidate's family. 11 C.F.R. § 113.1(g)(1)(i)(H). No further inquiry is required where an expenditure falls within this enumerated category. Second, and independently, the regulations define personal use to include any expense that would exist irrespective of the candidate's campaign or duties as a Federal officeholder. 11 C.F.R. § 113.1(g). The rent payments at issue implicate both bases.

The three disbursements totaling \$10,686.04 categorized as "RENT" in Flippo for Nevada's FEC filings constitute prohibited personal use expenditures. The characterization of 3400 Southhampton Drive as Flippo's personal residence is not a matter of inference or interpretation — it is established by Flippo's own sworn attestations.

Nevada's voter registration application form requires the registrant to provide the street address of "the location at which you actually reside," and expressly prohibits listing a P.O. Box or business address as a home address. The registrant must further swear or affirm the following: "The residential address listed herein is my sole legal place of residence and I claim no other place as my legal residence." The form bears the following warning: "WARNING: GIVING FALSE INFORMATION IS A FELONY AND INCLUDES A CIVIL PENALTY OF UP TO \$20,000." When Flippo registered to vote in Washoe County at 3400 Southhampton Drive, Reno, Nevada 89509, he swore under penalty of felony that it was his sole legal place of residence and that he claimed no other place as his legal residence. That sworn attestation forecloses any characterization of the property as temporary campaign lodging or anything other than his personal residence.

Flippo's voter registration attestation is corroborated by his own repeated public statements identifying the Southampton Drive property as his home, including his on-the-record statement to the Washoe County Republican Assembly on April 1, 2026 that he lives "right here in Reno," his campaign's public advertisement of the April 26, 2026 event as a "Cookout at the Lt. Colonel's House," and his own post-event social media statement that the "meet and greet at my home in Reno was incredible."

Because 3400 Southampton Drive is, by Flippo's own sworn attestation and repeated public statements, his personal residence, the campaign's payment of \$10,686.04 in rent on that property falls squarely and without ambiguity within the per se category of prohibited personal use under 11 C.F.R. § 113.1(g)(1)(i)(H), and independently constitutes personal use under the irrespective test of 11 C.F.R. § 113.1(g). These payments represent an unlawful conversion of campaign funds in violation of 52 U.S.C. § 30114(b).

#### **REQUESTED ACTION**

The Respondents' conduct as described herein constitutes a violation of 52 U.S.C. § 30114(b), 11 C.F.R. § 113.1(g)(1)(i)(H), and 11 C.F.R. § 113.1(g). Accordingly, the Complainant respectfully requests that the Commission:

1. Immediately investigate whether Flippo for Nevada has violated federal law by disbursing campaign funds for the personal living expenses of the candidate;
2. If a violation is found, enjoin the Respondents from further violations and impose the maximum penalties permitted by law.

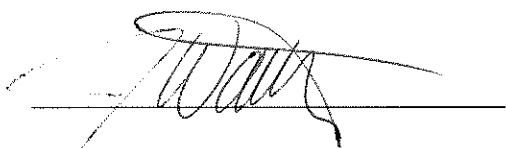
---

<sup>1</sup> A detailed account of the residency pattern, FEC disbursement records, voter registration records, and photographic evidence matching the campaign-funded rental property to images published on Flippo's campaign social media accounts was published on April 27, 2026 by Nevada News & Views: Brittany Sheehan, "NV-02's David Flippo Is Either a Liar or a Fraud — The Only Question Is Which One," Nevada News & Views (Apr. 27, 2026),

<https://nevadanewsandviews.com/nv-02s-david-flippo-is-either-a-liar-or-a-fraud-the-only-question-is-which-one/>.

The statements made in this complaint are true, correct, and complete to the best of the Complainant's knowledge and belief.

Respectfully submitted,



Jesse James Watts  
7730 Tamara Drive  
Reno, NV 89506

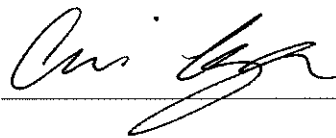
---

State of Nevada

County of Carson City

Signed and sworn (or affirmed) before me on 4/30/2026 (date)  
by Jesse James Watts.

(Seal)  **ARI MAURICIO IZA**  
Notary Public - State of Nevada  
Appointment recorded in Carson City  
25-6668-03 - Expires: March 14, 2029

  
Signature of Notarial Officer

Title Notary Public (and Rank):