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FEDERAL ELECTION COMMISSION
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OFFICE OF GENERAL COUNSEL

**BEFORE THE
FEDERAL ELECTION COMMISSION**

End Citizens United
Tiffany Muller
100 M St. SE
Washington, DC 20003

MUR 8046

Complainant,

v.

Brian Maryott
28721 Paseo Miraloma
San Juan Capistrano, C.A. 92675

Maryott for Congress and Brian Maryott
31726 Rancho Viejo Road, Suite 101
San Juan Capistrano, C.A. 92675

Respondents.

COMPLAINT

This complaint is filed under 52 U.S.C. § 30109(a)(1) against Brian Maryott in his capacity as candidate and treasurer of his principal campaign committee, Maryott for Congress (the "Committee"), collectively the "Respondents," for violating the Federal Election Campaign Act of 1971, as amended (the "Act") and Federal Election Commission (the "FEC" or "Commission") regulations. Specifically, it appears that Respondents have failed to disclose numerous payments that Brian Maryott and other campaign employees made through the mobile payment application Venmo for services and expenses that appear related to Maryott's congressional campaign. Accordingly, the Commission should find reason to believe that Respondents violated the Act's reporting requirements, immediately investigate these violations, and take appropriate remedial action against Respondents.

FACTS

Brian Maryott is a candidate for the U.S. House of Representatives in California's 49th Congressional District.¹ Maryott for Congress is Maryott's principal campaign committee and Maryott is also its treasurer.²

Beginning in January 2021 through November 2021, publicly available information shows that Maryott appears to have made payments on the mobile payment application Venmo to individuals who were employed by the Committee. As reflected in Exhibit A, the descriptions used for these Venmo transactions suggest that many, if not all, of the payments were related to Maryott's congressional campaign. The Committee's disclosure reports do not appear to reflect any of these transactions as in-kind contributions from Maryott to his campaign.

Here are the relevant transactions:

- Megan House served as the Maryott's Deputy Campaign Manager from March 2021 through January 2022.³ Between April and June 2021, the Committee disclosed making seven bi-weekly payments in the amount of \$1,149 to House for "Campaign Staff Wages."⁴ Maryott appears to have paid House through Venmo on April 20, 2021 and May 4, 2021 for "Tv" and "Petty Cash."⁵ These Venmo disbursements, however, do not appear to be included on the Committee's July 2021 quarterly report as either expenditures or in-kind contributions from Maryott.⁶
- Ryan Georgi was Operations Manager & Intern Coordinator for the Committee from January to April 2021.⁷ The Committee disclosed making seven bi-weekly payments to him for "Campaign Staff Wages" from April 2021 through July 2021.⁸ The first

¹ Fed. Elec. Comm'n Form 2, Amended Statement of Candidacy of Brian Maryott (Apr. 15, 2021), <https://docquery.fec.gov/pdf/544/202104159443497544/202104159443497544.pdf>.

² Fed. Elec. Comm'n Form 1, Statement of Organization of Maryott for Congress (Apr. 15, 2021), <https://docquery.fec.gov/pdf/804/202104159443497804/202104159443497804.pdf>.

³ Megan House, LINKEDIN, <https://www.linkedin.com/in/megan-house-637382163/> (last visited Aug. 16, 2021).

⁴ Fed. Elec. Comm'n Form 3, Maryott for Congress, July 2021 Quarterly Report at 44, 46, 53, 57, 65, 69, 77 (July 15, 2021), <https://docquery.fec.gov/pdf/090/202107159451328090/202107159451328090.pdf>.

⁵ Exhibit A at lines 16 and 18.

⁶ See Fed. Elec. Comm'n Form 3, Maryott for Congress, July 2021 Quarterly Report (July 15, 2021), <https://docquery.fec.gov/pdf/090/202107159451328090/202107159451328090.pdf>.

⁷ Ryan Georgi, LINKEDIN, <https://www.linkedin.com/in/ryangeorgi/> (last visited Aug. 16, 2021).

⁸ Fed. Elec. Comm'n Form 3, Maryott for Congress, Oct. 2021 Quarterly Report at 66, 78 (Oct. 15, 2021), <https://docquery.fec.gov/pdf/103/202110159467530103/202110159467530103.pdf>; Fed. Elec. Comm'n Form 3,

two payments were in amounts of \$410 and the other five were for \$293. Between January 2021 and August 2021, Maryott appears to have made eight payments to Georgi on Venmo, describing the purpose of the payments as “Reimbursement,” “Expenses,” “Friday,” “Week,” “Make up week,” “Per diem,” “Partial 2 weeks, march ending,” and “Shorter amt.” However, the Committee’s disclosure reports for the relevant reporting periods do not appear to include any of these eight Venmo disbursements, either as expenditures or as in-kind contributions from Maryott to the Committee.¹⁰

- Ricky Guthridge served as the Committee’s Intern Program Coordinator from November 2020 to March 2021 and then Orange County District Coordinator from March 2021 to August 2021.¹¹ The Committee disclosed making five bi-weekly payments to Guthridge for “Campaign Staff Wages” from April 2021 to June 2021.¹² The first two payments were for \$205 and the last three were for \$250.¹³ Between January 2021 and March 2021, Maryott appears to have made six payments to Guthridge through Venmo. According to the Venmo descriptions, these payments were for “reimbursement,” “expenses,” “week,” and “make up week.”¹⁴ The Committee’s April 2021 disclosure report does not appear to show any of these six Venmo disbursements, either as expenditures or as in-kind contributions from Maryott to his campaign committee.¹⁵
- Zachary Davila was the Committee’s Senior Campaign Associate in April 2021.¹⁶ The Committee did not disclose any payments to Davila in 2021. However, Maryott appears to have made a payment to Davila on Venmo on April 27, 2021, and the transaction contained the following description “Thanks!”. This payment through Venmo does not appear to be included in the Committee’s July 2021 report.¹⁷
- The Committee disclosed making a \$50 payment for mileage reimbursement to Zachary Lane on July 30, 2021 and an “Intern Stipend” for \$350 on August 11,

Maryott for Congress, July 2021 Quarterly Report at 52, 56, 64, 68, 76 (July 15, 2021), <https://docquery.fec.gov/pdf/090/202107159451328090/202107159451328090.pdf>.

⁹ Exhibit A at lines 2, 4, 6, 9, 11, 13, 15, and 25.

¹⁰ See Fed. Elec. Comm’n Form 3, Maryott for Congress, Oct. 2021 Quarterly Report (Oct. 15, 2021), <https://docquery.fec.gov/pdf/103/202110159467530103/202110159467530103.pdf>; Fed. Elec. Comm’n Form 3, Maryott for Congress, July 2021 Quarterly Report (July 15, 2021), <https://docquery.fec.gov/pdf/090/202107159451328090/202107159451328090.pdf>; Fed. Elec. Comm’n Form 3, Maryott for Congress, Apr. 2021 Quarterly Report (Apr. 15, 2021), <https://docquery.fec.gov/pdf/850/202104159443497850/202104159443497850.pdf>.

¹¹ Richard Guthridge, LINKEDIN, <https://www.linkedin.com/in/richard-guthridge-8645071b6/> (last visited Aug. 16, 2021).

¹² Fed. Elec. Comm’n Form 3, Maryott for Congress, July 2021 Quarterly Report at 52, 56, 64, 68, 76 (July 15, 2021), <https://docquery.fec.gov/pdf/090/202107159451328090/202107159451328090.pdf>.

¹³ *Id.*

¹⁴ Exhibit A at lines 1, 3, 5, 7, 10, and 12.

¹⁵ See Fed. Elec. Comm’n Form 3, Maryott for Congress, Apr. 2021 Quarterly Report (Apr. 15, 2021), <https://docquery.fec.gov/pdf/850/202104159443497850/202104159443497850.pdf>.

¹⁶ Zachary Davila, LINKEDIN, <https://www.linkedin.com/in/zachary-davila-5081771a5/> (last visited Aug. 16, 2021).

¹⁷ Exhibit A at line 17; see Fed. Elec. Comm’n Form 3, Maryott for Congress, July 2021 Quarterly Report (July 15, 2021), <https://docquery.fec.gov/pdf/090/202107159451328090/202107159451328090.pdf>;

2021.¹⁸ In a payment Maryott appears to have made to Lane on Venmo on November 18, 2021, Maryott described the payment as “Gift” but that payment does not appear to be included in the Committee’s disclosure report covering that reporting period.¹⁹

- Chris Crestik was a Field Coordinator for the Committee from July to November 2021.²⁰ The Committee did not disclose any payments to Crestik in 2021. However, Maryott appears to have made 10 payments to Crestik from July 2021 to November 2021 on Venmo, and according to the Venmo description, the payments were for “Broken phone,” “Reimbursement in phone,” “Tire,” and “Gas.”²¹ None of these payments on Venmo to Crestik from Maryott appear to be included in the relevant disclosure reports for the Committee.²²
- Joshua Meyer, according to his LinkedIn profile, worked as a Campaign Assistant and Senior Aide to the Committee from January 2019 through November 2020.²³ Maryott, appears to have paid Meyer through five times between February 2021 and July 2021 through Venmo. According to the Venmo descriptions, these payments were for “Oops Work,” “Stipend,” “Month,” “Tech support,” and “Stipends.” The relevant disclosure reports do not appear to show Maryott’s payments through Venmo or any other payments to Meyer.²⁴

In sum, as reflected in the chart below,²⁵ Maryott appears to have made at least 33 payments on Venmo directly to the above individuals who were employees for his campaign, but these payments do not appear to be included on the Committee’s disclosure reports:

	Date	Payment Description	Payor	Recipient
1.	1/21/2021	Reimbursement	Brian Maryott	Ricky Guthridge
2.	1/30/2021	Reimbursement	Brian Maryott	Ryan Georgi
3.	1/30/2021	Reimbursement	Brian Maryott	Ricky Guthridge
4.	2/9/2021	Expenses	Brian Maryott	Ryan Georgi

¹⁸ Fed. Elec. Comm’n Form 3, Maryott for Congress, Oct. 2021 Quarterly Report at 79, 89 (Oct. 15, 2021), <https://docquery.fec.gov/pdf/103/202110159467530103/202110159467530103.pdf>.

¹⁹ Exhibit A at line 32; *see* Fed. Elec. Comm’n Form 3, Maryott for Congress, Amended 2021 Year-End Report (Apr. 12, 2022), <https://docquery.fec.gov/pdf/037/202204129496068037/202204129496068037.pdf>.

²⁰ Chris Crestik, LINKEDIN, <https://www.linkedin.com/in/christopher-crestik-8779511ba/> (last visited Aug. 16, 2021).

²¹ Exhibit A at lines 22, 23, 24, 26, 27, 28, 29, 30, 31, and 33.

²² *See* Fed. Elec. Comm’n Form 3, Maryott for Congress, Amended 2021 Year-End Report (Apr. 12, 2022), <https://docquery.fec.gov/pdf/037/202204129496068037/202204129496068037.pdf>; Fed. Elec. Comm’n Form 3, Maryott for Congress, Oct. 2021 Quarterly Report (Oct. 15, 2021), <https://docquery.fec.gov/pdf/103/202110159467530103/202110159467530103.pdf>.

²³ Joshua Meyer, LINKEDIN, <https://www.linkedin.com/in/joshua-meyer-1004a0184/> (last visited Aug. 16, 2021).

²⁴ Exhibit A at lines 8, 14, 19, 20, and 21; *see* Fed. Elec. Comm’n Form 3, Maryott for Congress, Amended 2021 Year-End Report (Apr. 12, 2022), <https://docquery.fec.gov/pdf/037/202204129496068037/202204129496068037.pdf>; Fed. Elec. Comm’n Form 3, Maryott for Congress, Oct. 2021 Quarterly Report (Oct. 15, 2021), <https://docquery.fec.gov/pdf/103/202110159467530103/202110159467530103.pdf>.

²⁵ *See* Exhibit A for evidence of the Venmo transactions included in this chart.

5.	2/9/2021	Expenses	Brian Maryott	Ricky Guthridge
6.	2/19/2021	Friday	Brian Maryott	Ryan Georgi
7.	2/19/2021	Friday	Brian Maryott	Ricky Guthridge
8.	2/21/2021	Oops work	Brian Maryott	Joshua Meyer
9.	3/5/2021	Week	Brian Maryott	Ryan Georgi
10.	3/5/2021	Week	Brian Maryott	Ricky Guthridge
11.	3/6/2021	Make up week	Brian Maryott	Ryan Georgi
12.	3/6/2021	Make up week	Brian Maryott	Ricky Guthridge
13.	3/19/2021	Per Diem	Brian Maryott	Ryan Georgi
14.	3/31/2021	Stipend	Brian Maryott	Joshua Meyer
15.	4/14/2021	Partial 2 weeks, march ending	Brian Maryott	Ryan Georgi
16.	4/20/2021	Tv	Brian Maryott	Megan House
17.	4/27/2021	Thanks!	Brian Maryott	Zachary Davila
18.	5/4/2021	Petty Cash	Brian Maryott	Megan House
19.	5/15/2021	Month	Brian Maryott	Joshua Meyer
20.	6/9/2021	Tech support	Brian Maryott	Joshua Meyer
21.	7/2/2021	Stipends	Brian Maryott	Joshua Meyer
22.	7/9/2021	Broken phone	Brian Maryott	Chris Crestik
23.	7/24/2021	Reimbursement in phone	Brian Maryott	Chris Crestik
24.	8/8/2021	Gas	Brian Maryott	Chris Crestik
25.	8/31/2021	Shorter amt	Brian Maryott	Ryan Georgi
26.	9/14/2021	Gas	Brian Maryott	Chris Crestik
27.	9/26/2021	Gas	Brian Maryott	Chris Crestik
28.	10/6/2021	Gas	Brian Maryott	Chris Crestik
29.	10/19/2021	Gas	Brian Maryott	Chris Crestik
30.	10/22/2021	Tire	Brian Maryott	Chris Crestik
31.	11/18/2021	Gas	Brian Maryott	Chris Crestik
32.	11/18/2021	Gift	Brian Maryott	Russell Lane
33.	11/26/2021	Gas	Brian Maryott	Chris Crestik

In addition to Maryott's payments on Venmo, it appears that, between January 2020 and November 2020, individuals employed by or performing work for the Committee also made payments through Venmo to each other for what appear to be campaign-related expenses. The relevant Venmo transactions for these payments are reflected in Exhibit B.

As with Maryott's Venmo transactions, the Committee's disclosure reports do not clearly reflect any of these transactions. For instance, Senior Campaign Associate Zachary Davila made

three payments through Venmo described as “Work” to Ricky Guthridge in August and September 2020. At that time, Guthridge was working part time for the Committee doing voter outreach.²⁶ In addition, in July 2020, Ryan Georgi, who was working as an intern for the Committee, described a payment on Venmo to Guthridge as “Maryott for Congress.” The chart below shows at least 18 Venmo transactions that appear campaign-related,²⁷ none of which appear on the Committee’s disclosure reports.

	Date	Payment Description	Payor	Recipient
1.	6/15/2020	Tips	Zachary Davila	Ricky Guthridge
2.	7/3/2020	Maryott for Congress	Ryan Georgi	Ricky Guthridge
3.	7/9/2020	Pizzaz	Joshua Meyer	Ricky Guthridge
4.	7/27/2020	In out	Ryan Georgi	Ricky Guthridge
5.	7/31/2020	[Chicken head emoji]	Ricky Guthridge	Ryan Georgi
6.	9/5/2020	[Cash emoji]	Zachary Davila	Ricky Guthridge
7.	9/12/2020	Work	Zachary Davila	Ricky Guthridge
8.	9/19/2020	[Construction worker cartoon]	Zachary Davila	Ricky Guthridge
9.	9/25/2020	[Cash emoji]	Zachary Davila	Ricky Guthridge
10.	10/3/2020	Work	Zachary Davila	Ricky Guthridge
11.	10/17/2020	Work	Zachary Davila	Ricky Guthridge
12.	10/23/2020	[American flag emoji]	Zachary Davila	Ricky Guthridge
13.	10/28/2020	[American flag emoji]	Paloma Chacon	Ricky Guthridge
14.	11/1/2020	V	Zachary Davila	Ricky Guthridge
15.	1/6/2021	Rental	Joshua Meyer	Megan House
16.	1/7/2021	This should cover it. Let me know if you come up short.	Joshua Meyer	Megan House
17.	1/7/2021	[Gas tank emoji]	Megan House	Joshua Meyer
18.	1/30/2021	Reimbursement	Ricky Guthridge	Ryan Georgi

Without an investigation, it is impossible to confirm the amounts of the payments through Venmo listed in the charts above. Nonetheless, public information suggests that Maryott made multiple payments directly to individuals working for the Committee and that individuals

²⁶ Richard Guthridge, LINKEDIN, <https://www.linkedin.com/in/richard-guthridge-8645071b6/> (last visited Aug. 16, 2021).

²⁷ See Exhibit B for evidence of the Venmo transactions included in this chart.

working for the campaign made payments to each other for apparent work-related expenses. Because none of these transactions appear as expenditures or in-kind contributions on the Committee's FEC report, there is reason to believe that Respondents have systematically failed to report multiple campaign expenditures.

LEGAL DISCUSSION

Under the Act, a political committee must accurately report all contributions received and expenditures made on its disclosure reports.²⁸ The Act defines "contribution" and "expenditure" to include "anything of value," which includes in-kind contributions.²⁹ An "in-kind" contribution is any service or other thing of value provided to the committee.³⁰ Candidates can pay for campaign expenditures with personal funds, but they must treat any expenditures that are not reimbursed by the campaign as in-kind contributions from the candidate.³¹ The committee must report each in-kind contribution it receives as a contribution and as an expenditure.³²

The available information outlined above satisfies the threshold for finding reason to believe that Respondents violated these reporting requirements.³³ The "Commission will find 'reason to believe' in cases where the available evidence in the matter is . . . sufficient to warrant conducting an investigation" to determine whether "a violation in fact occurred and, if so, its exact scope."³⁴ Maryott appears to have made multiple payments directly to his campaign staff,

²⁸ 52 U.S.C. § 30104(a)(2); 11 C.F.R. § 104.3(a), (a)(3)(ii).

²⁹ 52 U.S.C. § 30101(8)(A)(i), (9)(A)(i).

³⁰ 11 C.F.R. § 100.51(a).

³¹ *Id.* § 104.3(3)(ii); Fed. Elec. Comm'n "How to Report In-kind contributions from the candidate," (last accessed May 31, 2022), <https://www.fec.gov/help-candidates-and-committees/filing-reports/-kind-contributions-candidate/>.

³² 11 C.F.R. § 104.13(a). For individual contributions, committees must identify each person whose contribution or contributions aggregate in excess of \$200 per calendar year during the election cycle, along with the date of receipt and the amount of the contribution. *Id.* § 104.3(a)(4)(i). Likewise, committees must identify each person to whom they make expenditures aggregating more than \$200 per election cycle, as well as the date, amount, and purpose of the expenditure. *Id.* § 104.3(b)(4)(i).

³³ *See* Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 12,545 (Mar. 16, 2007) (stating that the Commission will find reason to believe "in cases where the available evidence in the matter is at least sufficient to warrant conducting an investigation, and where the seriousness of the alleged violation warrants either further investigation or immediate conciliation").

describing the payments on Venmo as “reimbursements,” “expenses,” “week,” “month,” and “per diem,” among others. These descriptions support a reasonable inference that the payments were related to his campaign.³⁵ However, based on a review of the Committee’s disclosure reports, it does not appear that these Venmo disbursements were disclosed as expenditures of the Committee or in-kind contributions that Maryott made to his campaign. As the above chart shows, there are at least 33 transactions that Maryott made between January and November 2021 that appear campaign related. In addition, campaign employees and others associated with the campaign also appear to have paid each other through Venmo and used descriptions for those transactions that indicate that their payments may also be campaign-related. There are at least 18 of such payments. The Committee’s disclosure reports, however, do not appear to reflect any of these transactions.

Failing to disclose campaign-related payments on disclosure reports undermines transparency in the federal campaign process and prevents the Commission from fulfilling enforcement responsibilities. The public deserves to know how the Committee is spending in this congressional race.

REQUESTED ACTION

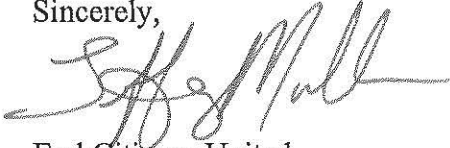
As we have shown, there is credible evidence that indicates that Respondents may have failed to comply with the reporting requirements in connection with payments made on Venmo for campaign-related expenses. Specifically, Respondents appear to have failed to report payments that Maryott and other campaign employees made for what appear to be services and expenses related to his congressional campaign. An investigation is necessary to determine the

³⁴ See Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 12,545

³⁵ It is not clear whether the Venmo payments were made through Maryott’s personal account or the Committee’s account. Either way, the payments should have been reported as Committee expenditures and, if they were unreimbursed by the Committee, they should have also been reported as in-kind contributions.

full scope of these reporting violations. As such, we respectfully request that the Commission immediately investigate these violations, fine Respondents the maximum amount permitted by law, and enjoin Respondents from further violations of the law.

Sincerely,



End Citizens United
Tiffany Muller
100 M St. SE
Washington, DC 20003

SUBSCRIBED AND SWORN to before me this second day of August 2022.

Mark Andrews

Notary Public

My Commission Expires:

MARK ANDREWS
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires July 14, 2024

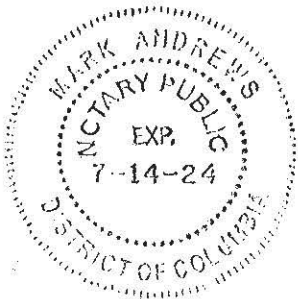

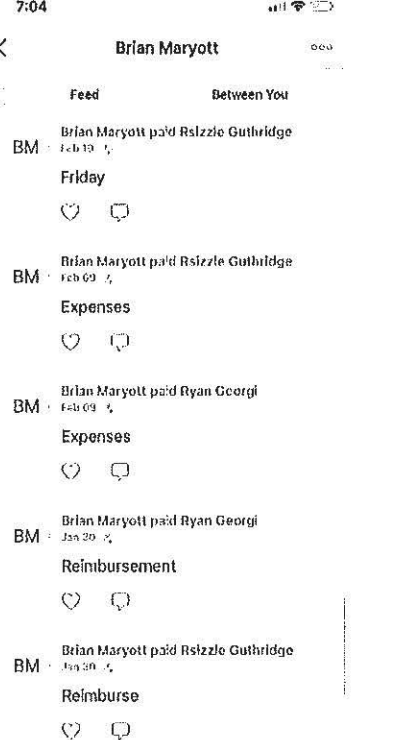
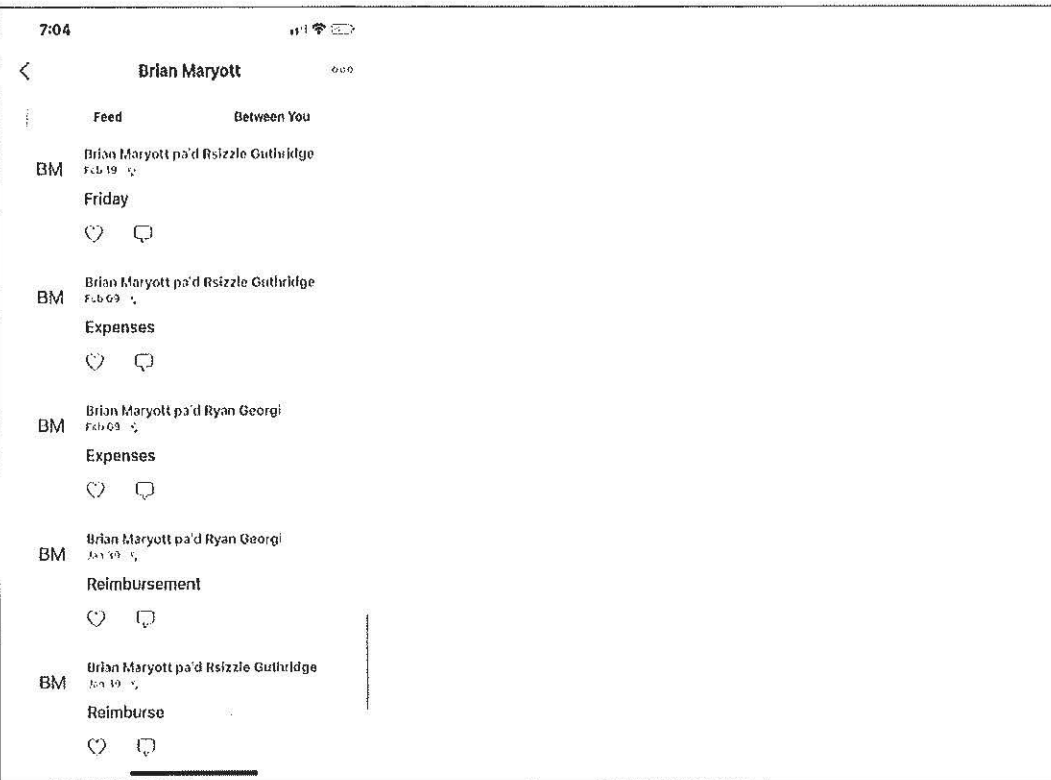
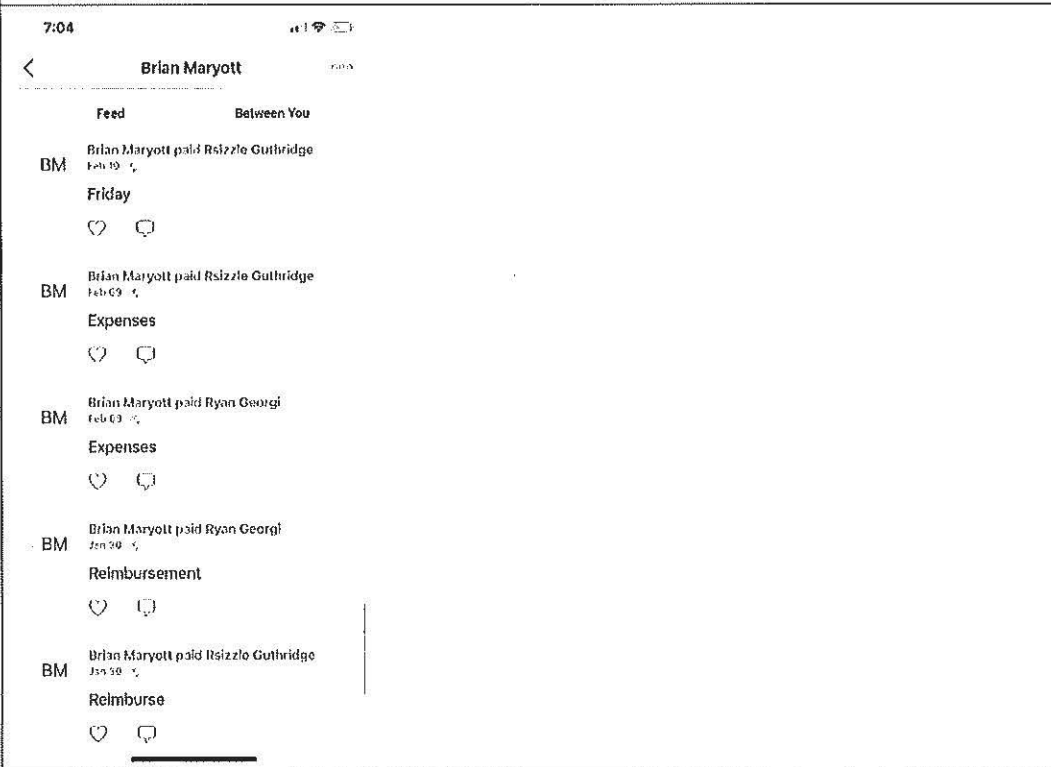


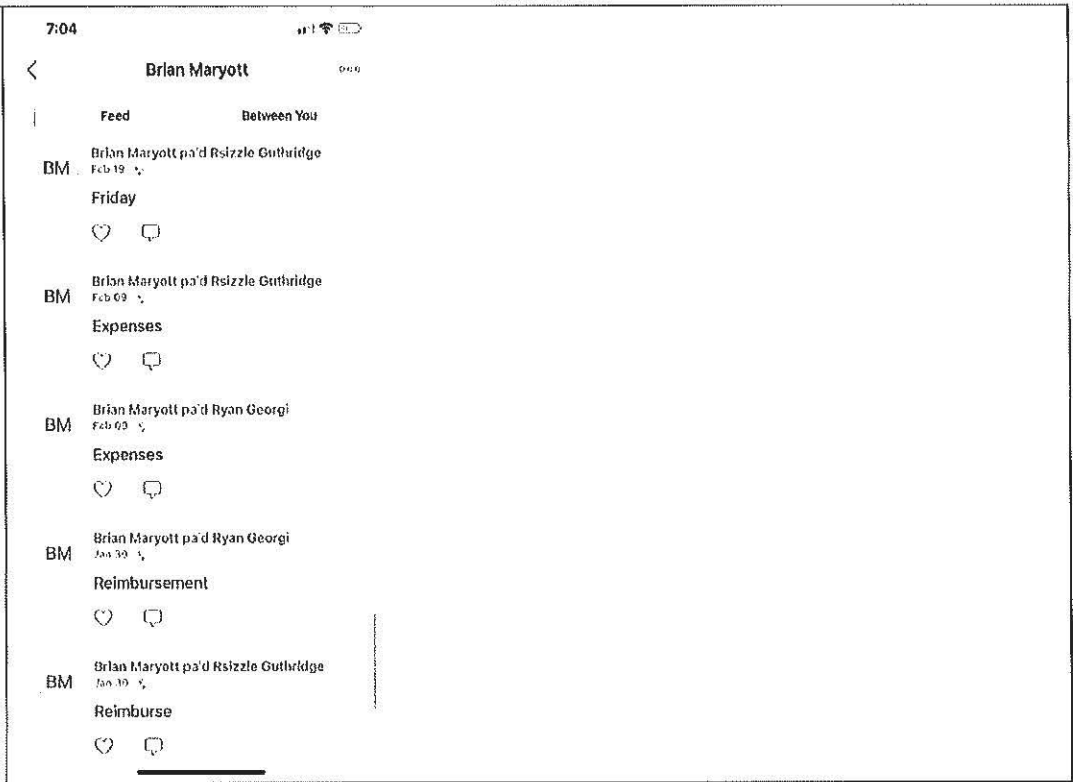
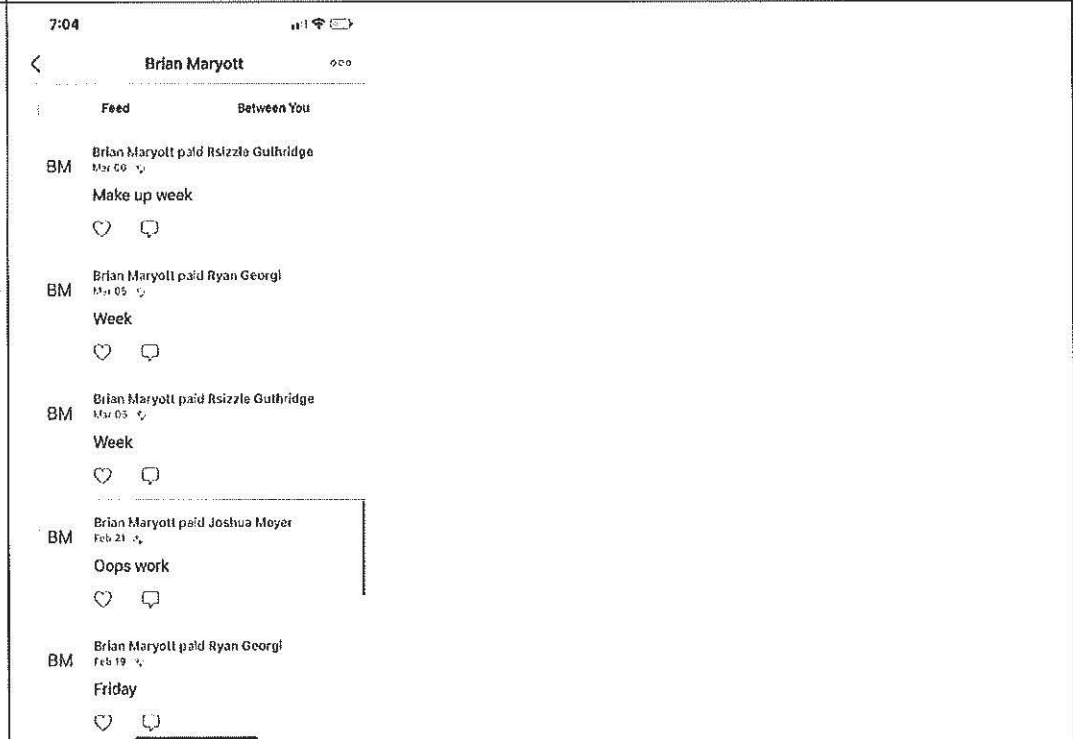
EXHIBIT A

This Exhibit A includes screenshots of Maryott’s Venmo transactions from August 2021. Most of these transactions are no longer publicly available on the Venmo application.

	Date	Screenshot
1.	1/21/2021	 <p>The screenshot shows two Venmo transactions from Brian Maryott (BM). The first transaction is dated Jan 21 and is labeled 'Reimbursement'. The second transaction is dated Dec 29, 2020, and is labeled 'Per Rtrippy'. Each transaction has a heart icon and a comment icon below it.</p>
2.	1/30/2021	 <p>The screenshot shows a Venmo feed for Brian Maryott. At the top, it says '7:04' and 'Between You'. Below this, there are five transactions, each starting with 'BM': 1. Brian Maryott paid Rszizzle Guthridge on Feb 13, labeled 'Friday'. 2. Brian Maryott paid Rszizzle Guthridge on Feb 09, labeled 'Expenses'. 3. Brian Maryott paid Ryan Georgi on Feb 09, labeled 'Expenses'. 4. Brian Maryott paid Ryan Georgi on Jan 20, labeled 'Reimbursement'. 5. Brian Maryott paid Rszizzle Guthridge on Jan 20, labeled 'Reimburse'. Each transaction includes a heart icon and a comment icon.</p>
3.	1/30/2021	



























		 <p>7:04 AT&T 📶 🔋</p> <p>< Brian Maryott 000</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Rszizle Guthridge Feb 19 👍</p> <p>Friday</p> <p>👍 💬</p> <p>BM Brian Maryott paid Rszizle Guthridge Feb 09 👍</p> <p>Expenses</p> <p>👍 💬</p> <p>BM Brian Maryott paid Ryan Georgi Feb 03 👍</p> <p>Expenses</p> <p>👍 💬</p> <p>BM Brian Maryott paid Ryan Georgi Jan 19 👍</p> <p>Reimbursement</p> <p>👍 💬</p> <p>BM Brian Maryott paid Rszizle Guthridge Jan 19 👍</p> <p>Reimburse</p> <p>👍 💬</p>
4.	2/9/2021	 <p>7:04 AT&T 📶 🔋</p> <p>< Brian Maryott 000</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Rszizle Guthridge Feb 19 👍</p> <p>Friday</p> <p>👍 💬</p> <p>BM Brian Maryott paid Rszizle Guthridge Feb 09 👍</p> <p>Expenses</p> <p>👍 💬</p> <p>BM Brian Maryott paid Ryan Georgi Feb 03 👍</p> <p>Expenses</p> <p>👍 💬</p> <p>BM Brian Maryott paid Ryan Georgi Jan 19 👍</p> <p>Reimbursement</p> <p>👍 💬</p> <p>BM Brian Maryott paid Rszizle Guthridge Jan 19 👍</p> <p>Reimburse</p> <p>👍 💬</p>
5.	2/9/2021	

		<p>7:04 📶 🔋</p> <p>< Brian Maryott 000</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Rszizle Guthridge Feb 19 5:41</p> <p>Friday</p> <p>♥️ 🗨️</p> <p>BM Brian Maryott paid Rszizle Guthridge Feb 09 5:41</p> <p>Expenses</p> <p>♥️ 🗨️</p> <p>BM Brian Maryott paid Ryan Georgi Feb 09 5:41</p> <p>Expenses</p> <p>♥️ 🗨️</p> <p>BM Brian Maryott paid Ryan Georgi Jan 30 5:41</p> <p>Reimbursement</p> <p>♥️ 🗨️</p> <p>BM Brian Maryott paid Rszizle Guthridge Jan 29 5:41</p> <p>Reimburse</p> <p>♥️ 🗨️</p>
<p>6.</p>	<p>2/19/2021</p>	<p>7:04 📶 🔋</p> <p>< Brian Maryott 000</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Rszizle Guthridge Mar 05 5:41</p> <p>Make up week</p> <p>♥️ 🗨️</p> <p>BM Brian Maryott paid Ryan Georgi Mar 05 5:41</p> <p>Week</p> <p>♥️ 🗨️</p> <p>BM Brian Maryott paid Rszizle Guthridge Mar 05 5:41</p> <p>Week</p> <p>♥️ 🗨️</p> <p>BM Brian Maryott paid Joshua Meyer Feb 21 5:41</p> <p>Oops work</p> <p>♥️ 🗨️</p> <p>BM Brian Maryott paid Ryan Georgi Feb 19 5:41</p> <p>Friday</p> <p>♥️ 🗨️</p>
<p>7.</p>	<p>2/19/2021</p>	

		
8.	2/21/2021	
9.	3/5/2021	




















		<p>7:04 📶 🔋</p> <p>< Brian Maryott 👤</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Rszlze Guthridge Mar 04 '21 Make up week ❤️ 💬</p> <p>BM Brian Maryott paid Ryan Georgi Mar 05 '21 Week ❤️ 💬</p> <p>BM Brian Maryott paid Rszlze Guthridge Mar 05 '21 Week ❤️ 💬</p> <p>BM Brian Maryott paid Joshua Meyer Feb 21 '21 Oops work ❤️ 💬</p> <p>BM Brian Maryott paid Ryan Georgi Feb 19 '21 Friday ❤️ 💬</p>
<p>10.</p>	<p>3/5/2021</p>	<p>7:04 📶 🔋</p> <p>< Brian Maryott 👤</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Rszlze Guthridge Mar 05 '21 Make up week ❤️ 💬</p> <p>BM Brian Maryott paid Ryan Georgi Mar 05 '21 Week ❤️ 💬</p> <p>BM Brian Maryott paid Rszlze Guthridge Mar 05 '21 Week ❤️ 💬</p> <p>BM Brian Maryott paid Joshua Meyer Feb 21 '21 Oops work ❤️ 💬</p> <p>BM Brian Maryott paid Ryan Georgi Feb 19 '21 Friday ❤️ 💬</p>
<p>11.</p>	<p>3/6/2021</p>	

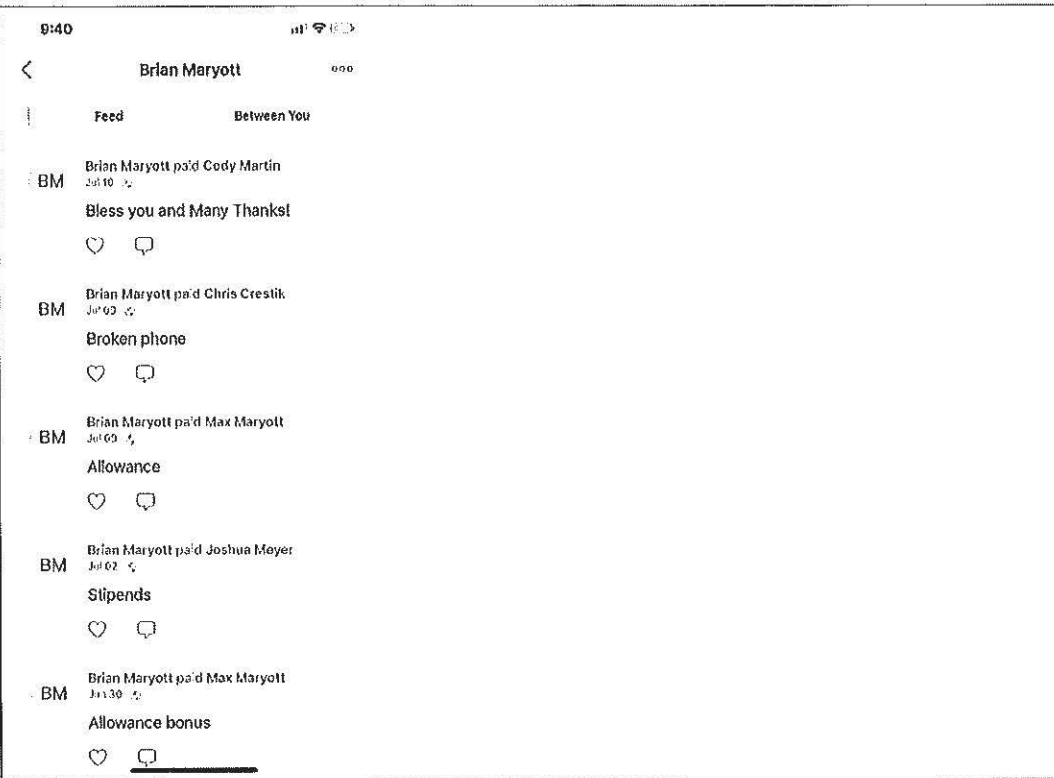
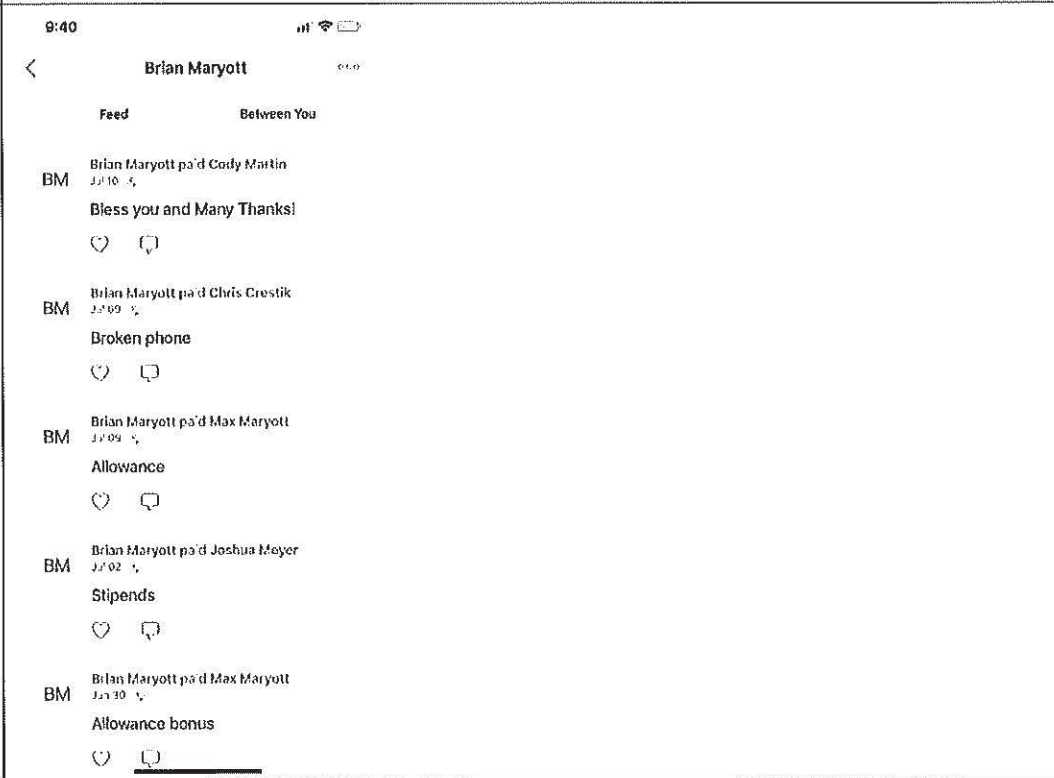
		<p>7:04 📶 🔋</p> <p>< Brian Maryott ☰</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Ryan Georgi Mar 14</p> <p>Partial 2 weeks, march ending</p> <p>♡ 🗨</p> <p>BM Brian Maryott paid Joshua Meyer Mar 31</p> <p>Stipend</p> <p>♡ 🗨</p> <p>BM Brian Maryott paid Ryan Georgi Mar 19</p> <p>Per Diem</p> <p>♡ 🗨</p> <p>BM Brian Maryott paid Cody M Mar 16</p> <p>Vista run</p> <p>♡ 🗨</p> <p>BM Brian Maryott paid Ryan Georgi Mar 06</p> <p>Make up week</p> <p>♡ 🗨</p>
12.	3/6/2021	<p>7:04 📶 🔋</p> <p>< Brian Maryott ☰</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Rszizle Guthridge Mar 08</p> <p>Make up week</p> <p>♡ 🗨</p> <p>BM Brian Maryott paid Ryan Georgi Mar 05</p> <p>Week</p> <p>♡ 🗨</p> <p>BM Brian Maryott paid Rszizle Guthridge Mar 05</p> <p>Week</p> <p>♡ 🗨</p> <p>BM Brian Maryott paid Joshua Meyer Feb 21</p> <p>Oops work</p> <p>♡ 🗨</p> <p>BM Brian Maryott paid Ryan Georgi Feb 12</p> <p>Friday</p> <p>♡ 🗨</p>
13.	3/19/2021	

		<p>7:04 4G LTE   </p> <p>Brian Maryott one</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Ryan Georgi Apr 13 5:00 Partial 2 weeks, march ending  </p> <p>BM Brian Maryott paid Joshua Meyer Mar 31 5:00 Stipend  </p> <p>BM Brian Maryott paid Ryan Georgi Mar 19 5:00 Per Diem  </p> <p>BM Brian Maryott paid Cody M Mar 16 5:00 Vista run  </p> <p>BM Brian Maryott paid Ryan Georgi Mar 06 5:00 Make up week  </p>
14.	3/31/2021	<p>7:04 4G LTE   </p> <p>Brian Maryott one</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Ryan Georgi Apr 14 5:00 Partial 2 weeks, march ending  </p> <p>BM Brian Maryott paid Joshua Meyer Mar 31 5:00 Stipend  </p> <p>BM Brian Maryott paid Ryan Georgi Mar 19 5:00 Per Diem  </p> <p>BM Brian Maryott paid Cody M Mar 16 5:00 Vista run  </p> <p>BM Brian Maryott paid Ryan Georgi Mar 06 5:00 Make up week  </p>
15.	4/14/2021	

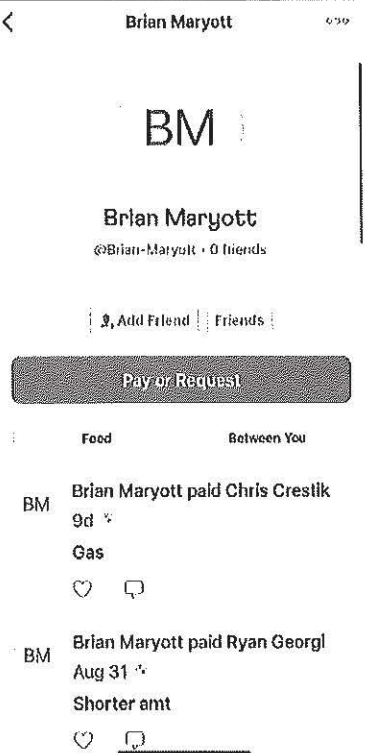
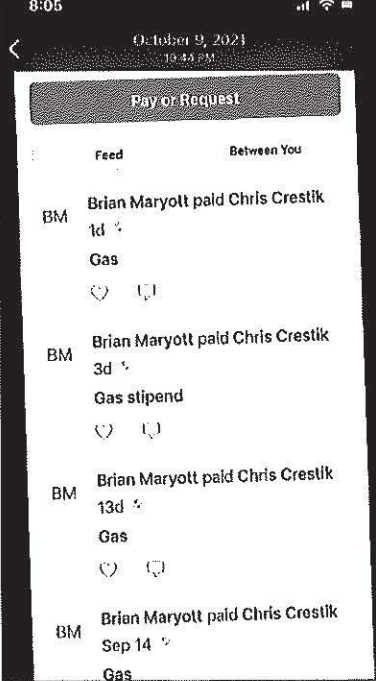
		<p>7:04 📶 🔋</p> <p>< Brian Maryott ☰</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Ryan Georgi Mar 14 '21 Partial 2 weeks, march ending ❤️ 💬</p> <p>BM Brian Maryott paid Joshua Meyer Mar 31 '21 Stipend ❤️ 💬</p> <p>BM Brian Maryott paid Ryan Georgi Mar 19 '21 Per Diem ❤️ 💬</p> <p>BM Brian Maryott paid Cody M Mar 16 '21 Vista run ❤️ 💬</p> <p>BM Brian Maryott paid Ryan Georgi Mar 06 '21 Make up week ❤️ 💬</p>
<p>16.</p>	<p>4/20/2021</p>	<p>7:04 📶 🔋</p> <p>< Brian Maryott ☰</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Joshua Meyer May 12 '21 Month ❤️ 💬</p> <p>BM Brian Maryott paid Max Maryott May 04 '21 Allowance ❤️ 💬</p> <p>BM Brian Maryott paid Megan House May 04 '21 Petty cash ❤️ 💬</p> <p>BM Brian Maryott paid Zachary Davila Apr 27 '21 Thanks! ❤️ 💬</p> <p>BM Brian Maryott paid Megan House Apr 20 '21 Tv ❤️ 💬</p>
<p>17.</p>	<p>4/27/2021</p>	

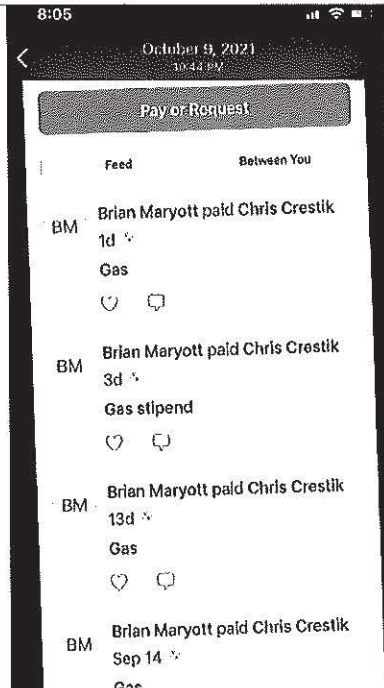
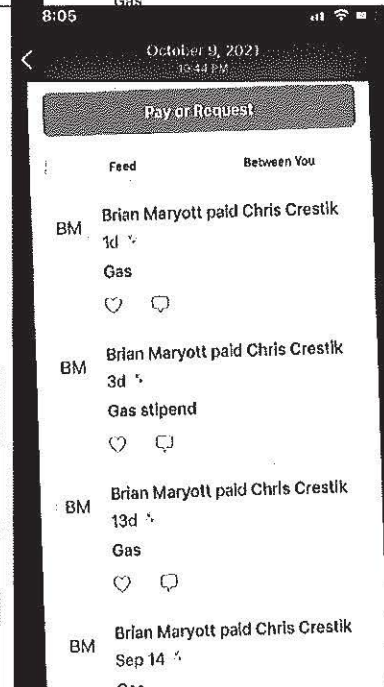
		<p>7:04 📶 🔋</p> <p>< Brian Maryott ☰</p> <hr/> <p>Feed Between You</p> <p>BM Brian Maryott pa'd Joshua Meyer May 15 👤</p> <p>Month</p> <p>♡ 💬</p> <hr/> <p>BM Brian Maryott pa'd Max Maryott May 04 👤</p> <p>Allowance</p> <p>♡ 💬</p> <hr/> <p>BM Brian Maryott pa'd Megan House May 04 👤</p> <p>Petty cash</p> <p>♡ 💬</p> <hr/> <p>BM Brian Maryott pa'd Zachary Davila Apr 27 👤</p> <p>Thanks!</p> <p>♡ 💬</p> <hr/> <p>BM Brian Maryott pa'd Megan House Apr 20 👤</p> <p>Tv</p> <p>♡ 💬</p>
18.	5/4/2021	<p>7:04 📶 🔋</p> <p>< Brian Maryott ☰</p> <hr/> <p>Feed Between You</p> <p>BM Brian Maryott pa'd Joshua Meyer May 15 👤</p> <p>Month</p> <p>♡ 💬</p> <hr/> <p>BM Brian Maryott pa'd Max Maryott May 04 👤</p> <p>Allowance</p> <p>♡ 💬</p> <hr/> <p>BM Brian Maryott pa'd Megan House May 04 👤</p> <p>Petty cash</p> <p>♡ 💬</p> <hr/> <p>BM Brian Maryott pa'd Zachary Davila Apr 27 👤</p> <p>Thanks!</p> <p>♡ 💬</p> <hr/> <p>BM Brian Maryott pa'd Megan House Apr 20 👤</p> <p>Tv</p> <p>♡ 💬</p>
19.	5/15/2021	

		<p>7:04 at   </p> <p>< Brian Maryott you</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Joshua Meyer May 12 '21 Month  </p> <p>BM Brian Maryott paid Max Maryott May 04 '21 Allowance  </p> <p>BM Brian Maryott paid Megan House May 04 '21 Petty cash  </p> <p>BM Brian Maryott paid Zachary Davila Apr 27 '21 Thanks!  </p> <p>BM Brian Maryott paid Megan House Apr 20 '21 Tv  </p>
20.	6/9/2021	<p>BM Brian Maryott paid Max Maryott Jun 20 '21 Allowance  </p> <p>BM Brian Maryott paid Joshua Meyer Jun 09 '21 Tech support  </p> <p>BM Brian Maryott paid Max Maryott May 20 '21 Catchup  </p>
21.	7/2/2021	

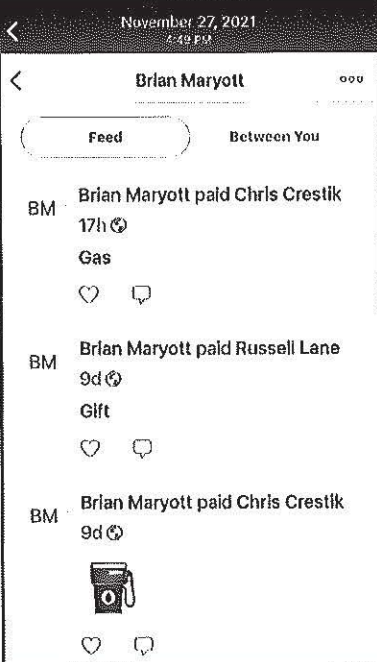

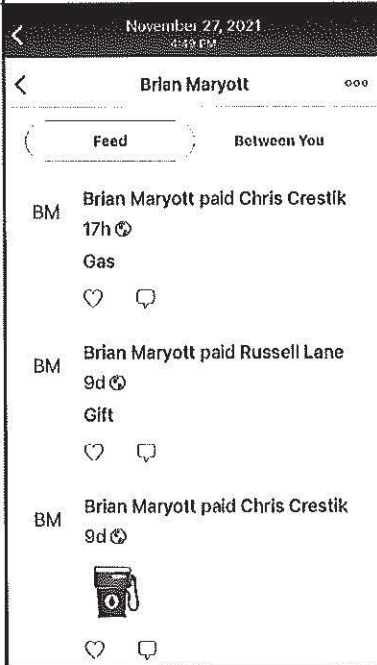

		
22.	7/9/2021	
23.	7/24/2021	

		<p>9:40</p> <p>< Brian Maryott</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Chris Crestik 8/1 5 Gas ♡ □</p> <p>BM Brian Maryott paid Max Maryott 8/2 5 Household bonuses ♡ □</p> <p>BM Brian Maryott paid Max Maryott 8/26 5 Household Income ♡ □</p> <p>BM Brian Maryott paid Chris Crestik 8/24 5 Reimbursement in phone ♡ □</p> <p>BM Brian Maryott paid Max Maryott 8/21 5 Household work ♡ □</p>
24.	8/8/2021	<p>9:40</p> <p>< Brian Maryott</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Chris Crestik 8/8 5 Gas ♡ □</p> <p>BM Brian Maryott paid Max Maryott 8/2 5 Household bonuses ♡ □</p> <p>BM Brian Maryott paid Max Maryott 8/26 5 Household Income ♡ □</p> <p>BM Brian Maryott paid Chris Crestik 8/23 5 Reimbursement in phone ♡ □</p> <p>BM Brian Maryott paid Max Maryott 8/21 5 Household work ♡ □</p>
25.	8/31/2021	

		
26.	9/14/2021	
27.	9/26/2021	

			
28.	10/6/2021		
29.	10/19/2021		

<p>30.</p>	<p>10/22/2021</p>	
<p>31.</p>	<p>11/18/2021</p>	

		 <p>November 27, 2021 4:49 PM</p> <p>Brian Maryott</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Chris Crestik 17h Gas</p> <p>BM Brian Maryott paid Russell Lane 9d Gift</p> <p>BM Brian Maryott paid Chris Crestik 9d </p>	
32.	11/18/2021	 <p>November 27, 2021 4:49 PM</p> <p>Brian Maryott</p> <p>Feed Between You</p> <p>BM Brian Maryott paid Chris Crestik 17h Gas</p> <p>BM Brian Maryott paid Russell Lane 9d Gift</p> <p>BM Brian Maryott paid Chris Crestik 9d </p>	
33.	11/26/2021		

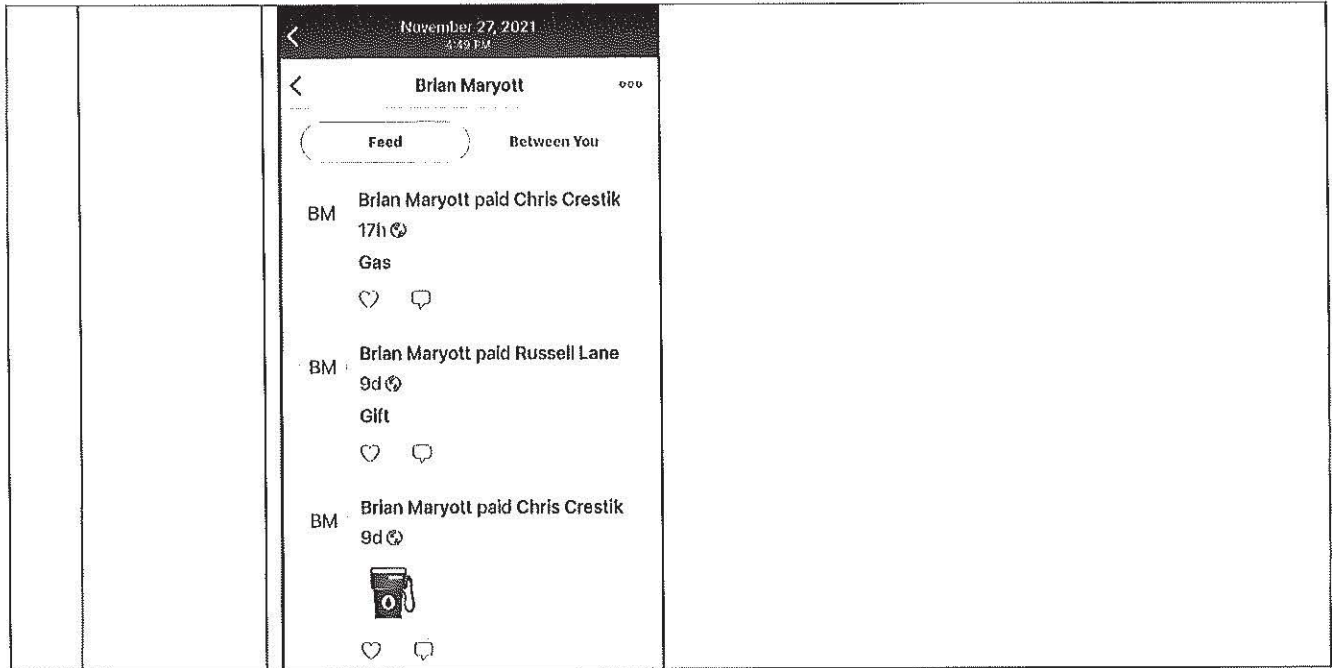
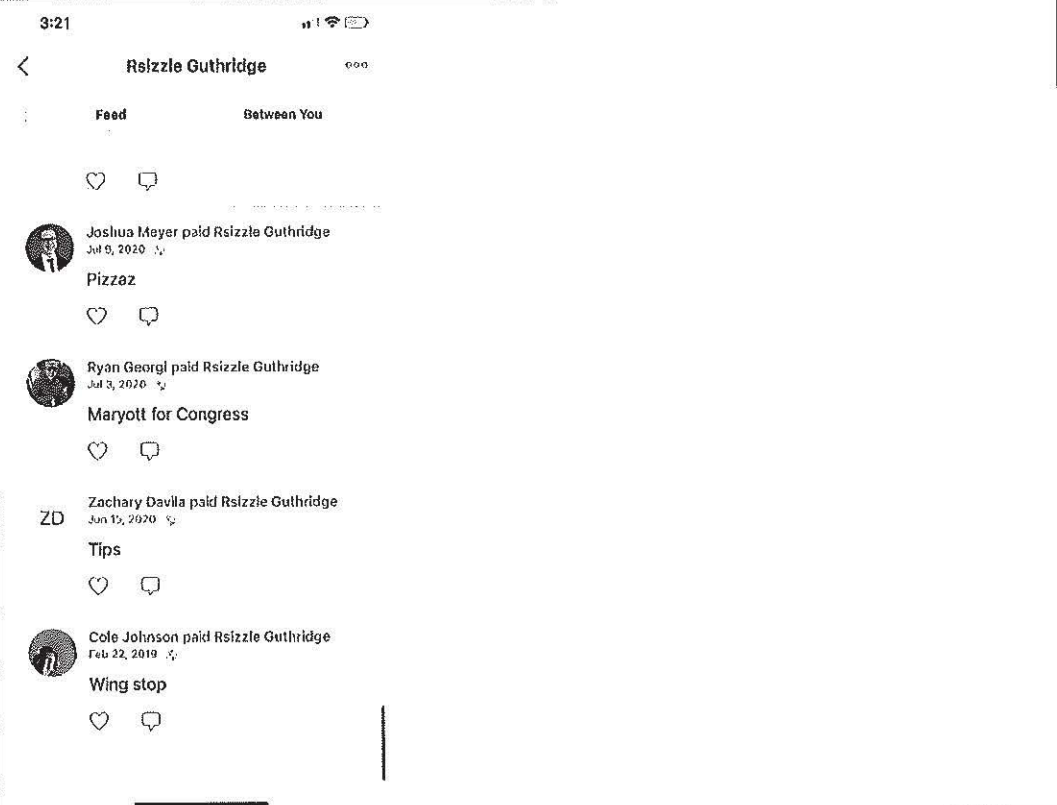










EXHIBIT B







This Exhibit B includes screenshots of multiple Maryott campaign staffers' Venmo transactions from August 2021. Most of these transactions are no longer publicly available on the Venmo application.

	Date	Screenshot
1.	6/15/2020	 <p>The screenshot shows the Venmo profile for 'Rsizzle Guthridge'. At the top, it says '3:21' and shows signal, Wi-Fi, and battery icons. Below the profile name, there are tabs for 'Feed' and 'Between You'. The transaction history includes:</p> <ul style="list-style-type: none"> Joshua Meyer paid Rsizzle Guthridge on Jul 9, 2020, for 'Pizzaz'. Ryan Georgi paid Rsizzle Guthridge on Jul 3, 2020, for 'Maryott for Congress'. Zachary Davila paid Rsizzle Guthridge on Jun 12, 2020, with initials 'ZD'. Tips section. Cole Johnson paid Rsizzle Guthridge on Feb 22, 2019, for 'Wing stop'.
2.	7/3/2020	










		
3.	7/9/2020	
4.	7/27/2020	

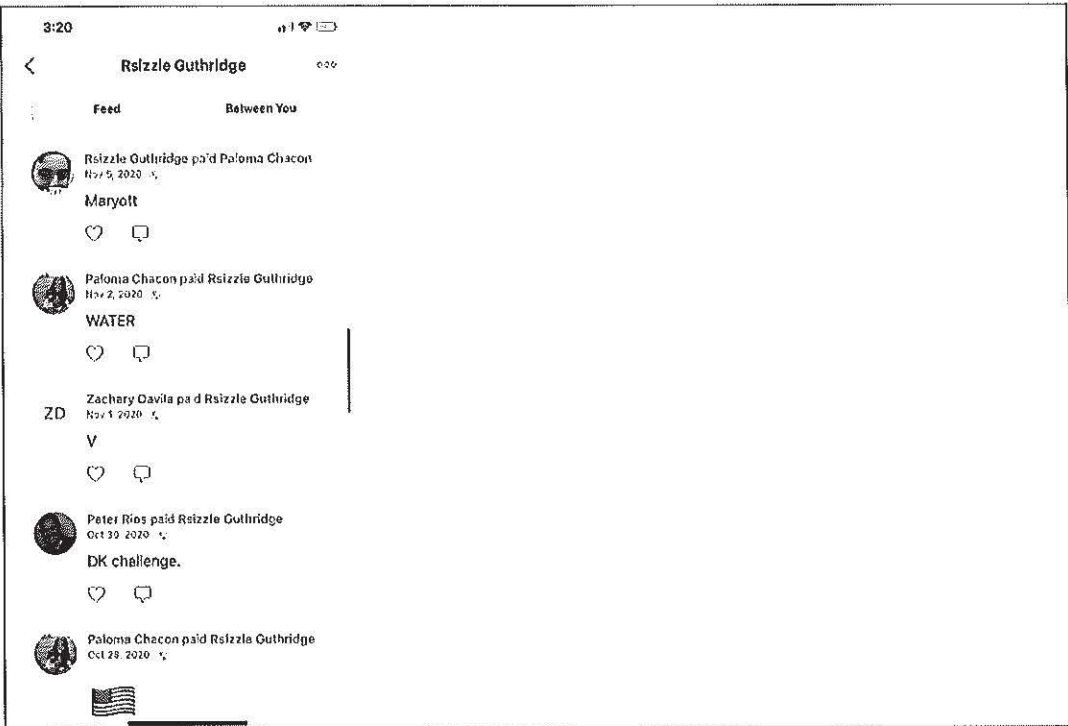
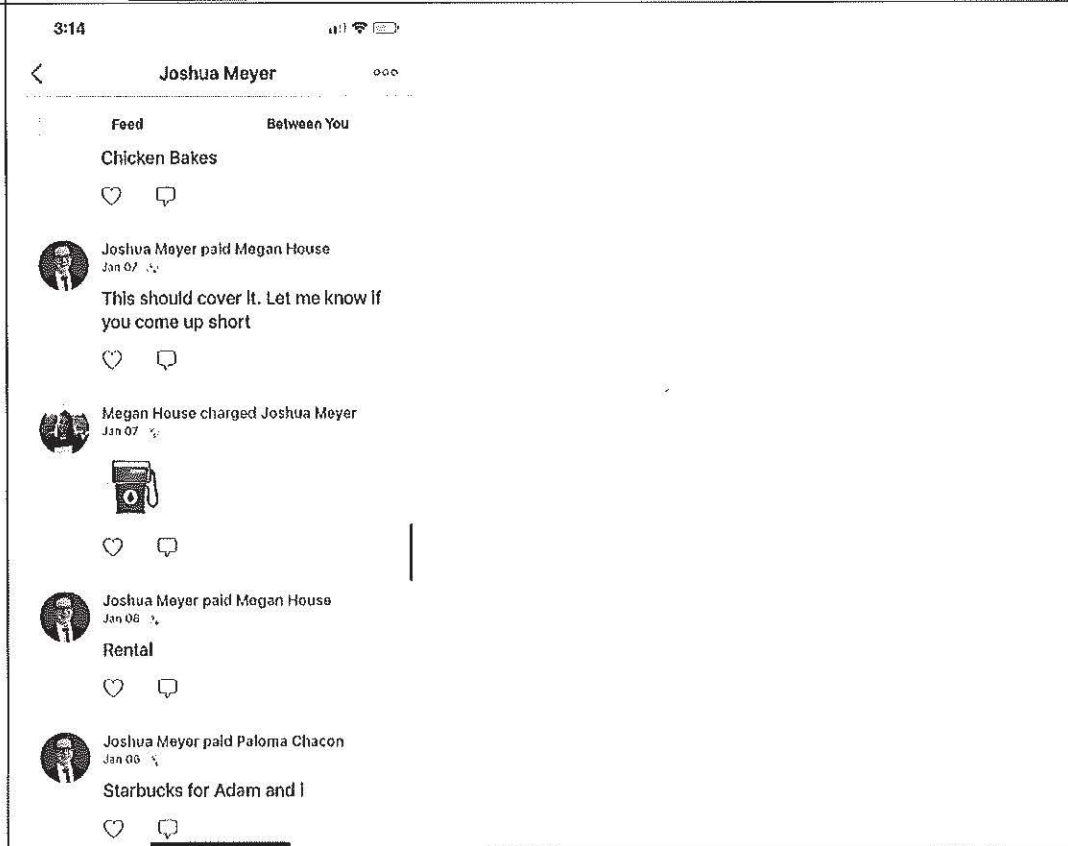
		<p>3:16</p> <p>Ryan Georgi</p> <p>Feed Between You</p> <p>Ryan Georgi paid Max Maryott Jul 30, 2020 In n out</p> <p>Ryan Georgi paid Rszizzle Guthridge Jul 30, 2020 Maryott for Congress</p> <p>Hunter Roe paid Ryan Georgi Jul 31, 2020 schlopyes</p> <p>Ryan Georgi paid Hunter Roe Jul 7, 2020 's</p> <p>Ryan Georgi paid Hunter Roe</p>
5.	7/31/2020	<p>3:20</p> <p>Rszizzle Guthridge</p> <p>Feed Between You</p> <p>Rick Guthridge paid Rszizzle Guthridge Aug 5, 2020 Walking money</p> <p>Rszizzle Guthridge paid Ryan Georgi Jul 31, 2020</p> <p>Ryan Georgi paid Rszizzle Guthridge Jul 27, 2020 In out</p>
6.	9/5/2020	

		<p>3:20</p> <p>< Rszizzle Guthridge</p> <p>Feed Between You</p> <p>RG Rick Guthridge paid Rszizzle Guthridge Sep 17, 2020 Walking 🚶</p>  <p>♥</p> <p>ZD Zachary Davila paid Rszizzle Guthridge Sep 12, 2020 Work</p>  <p>♥</p> <p>ZD Zachary Davila paid Rszizzle Guthridge Sep 5, 2020</p> 
7.	9/12/2020	<p>3:20</p> <p>< Rszizzle Guthridge</p> <p>Feed Between You</p> <p>RG Rick Guthridge paid Rszizzle Guthridge Sep 17, 2020 Walking 🚶</p>  <p>♥</p> <p>ZD Zachary Davila paid Rszizzle Guthridge Sep 12, 2020 Work</p>  <p>♥</p> <p>ZD Zachary Davila paid Rszizzle Guthridge Sep 5, 2020</p> 
8.	9/19/2020	

		<p>3:20 📶 🔋</p> <p>< Rszizle Guthridge ⋮</p> <p>Feed Between You</p> <p>ZD Zechary Davila pa'd Rszizle Guthridge Oct 3, 2020 👤</p> <p>Work</p> <p>👍 🗨</p> <p>ZD Zechary Davila pa'd Rszizle Guthridge Sep 26, 2020 👤</p> <p></p> <p>👍 🗨</p> <p>ZD Zechary Davila pa'd Rszizle Guthridge Sep 19, 2020 👤</p> <p>Work</p> <p></p> <p>👍 🗨</p> <p>RG Rick Guthridge pa'd Rszizle Guthridge Sep 12, 2020 👤</p> <p>Walking </p>
9.	9/25/2020	<p>3:20 📶 🔋</p> <p>< Rszizle Guthridge ⋮</p> <p>Feed Between You</p> <p>ZD Zechary Davila pa'd Rszizle Guthridge Oct 3, 2020 👤</p> <p>Work</p> <p>👍 🗨</p> <p>ZD Zechary Davila pa'd Rszizle Guthridge Sep 26, 2020 👤</p> <p></p> <p>👍 🗨</p> <p>ZD Zechary Davila pa'd Rszizle Guthridge Sep 19, 2020 👤</p> <p>Work</p> <p></p> <p>👍 🗨</p> <p>RG Rick Guthridge pa'd Rszizle Guthridge Sep 12, 2020 👤</p> <p>Walking </p>
10.	10/3/2020	

		<p>3:20 11 1 </p> <p>< Rszizle Guthridge 0:00</p> <p>Feed Between You</p> <p>ZD Zachary Davila paid Rszizle Guthridge Oct 23, 2020 5: </p> <p>ZD Zachary Davila paid Rszizle Guthridge Oct 17, 2020 5: Work</p> <p>MM Max Maryott paid Rszizle Guthridge Oct 19, 2020 5: Work</p> <p>RG Rick Guthridge paid Rszizle Guthridge Oct 19, 2020 5: </p> <p>ZD Zachary Davila paid Rszizle Guthridge Oct 3, 2020 5: Work</p>
<p>11.</p>	<p>10/17/2020</p>	<p>3:20 11 1 </p> <p>< Rszizle Guthridge 0:00</p> <p>Feed Between You</p> <p>ZD Zachary Davila paid Rszizle Guthridge Oct 23, 2020 5: </p> <p>ZD Zachary Davila paid Rszizle Guthridge Oct 17, 2020 5: Work</p> <p>MM Max Maryott paid Rszizle Guthridge Oct 19, 2020 5: Work</p> <p>RG Rick Guthridge paid Rszizle Guthridge Oct 19, 2020 5: </p> <p>ZD Zachary Davila paid Rszizle Guthridge Oct 3, 2020 5: Work</p>
<p>12.</p>	<p>10/23/2020</p>	<p>Work</p>

		 <p>3:20</p> <p>< Rsizzle Guthridge</p> <p>Feed Between You</p> <p>ZD Zachary Davila paid Rsizzle Guthridge Oct 23, 2020</p> <p></p> <p>♥ □</p> <p>ZD Zachary Davila paid Rsizzle Guthridge Oct 19, 2020</p> <p>Work</p> <p>♥ □</p> <p>MM Max Maryott paid Rsizzle Guthridge Oct 19, 2020</p> <p>Work</p> <p>♥ □</p> <p>RG Rick Guthridge paid Rsizzle Guthridge Oct 9, 2020</p> <p></p> <p>♥ □</p> <p>ZD Zachary Davila paid Rsizzle Guthridge Oct 8, 2020</p>
13.	10/28/2020	 <p>3:20</p> <p>< Rsizzle Guthridge</p> <p>Feed Between You</p> <p> Paloma Chacon paid Rsizzle Guthridge Nov 5, 2020</p> <p>Maryott</p> <p>♥ □</p> <p> Paloma Chacon paid Rsizzle Guthridge Nov 2, 2020</p> <p>WATER</p> <p>♥ □</p> <p>ZD Zachary Davila paid Rsizzle Guthridge Nov 1, 2020</p> <p>V</p> <p>♥ □</p> <p> Peter Rios paid Rsizzle Guthridge Oct 30, 2020</p> <p>DK challenge.</p> <p>♥ □</p> <p> Paloma Chacon paid Rsizzle Guthridge Oct 29, 2020</p> <p></p>
14.	11/1/2020	

		 <p>3:20</p> <p>Rszizle Guthridge</p> <p>Feed Between You</p> <p>Rszizle Guthridge paid Paloma Chacon Nov 5, 2020 Maryott ❤️ 💬</p> <p>Paloma Chacon paid Rszizle Guthridge Nov 2, 2020 WATER ❤️ 💬</p> <p>ZD Zachary Davila paid Rszizle Guthridge Nov 1, 2020 V ❤️ 💬</p> <p>Peter Rios paid Rszizle Guthridge Oct 30, 2020 DK challenge. ❤️ 💬</p> <p>Paloma Chacon paid Rszizle Guthridge Oct 28, 2020 🇺🇸</p>
15.	1/6/2021	 <p>3:14</p> <p>Joshua Meyer</p> <p>Feed Between You</p> <p>Chicken Bakes ❤️ 💬</p> <p>Joshua Meyer paid Megan House Jan 07 This should cover it. Let me know if you come up short ❤️ 💬</p> <p>Megan House charged Joshua Meyer Jan 07 ❤️ 💬</p> <p>Joshua Meyer paid Megan House Jan 06 Rental ❤️ 💬</p> <p>Joshua Meyer paid Paloma Chacon Jan 06 Starbucks for Adam and I ❤️ 💬</p>
16.	1/7/2021	

		
17.	1/7/2021	
18.	1/30/2021	

