

BEFORE THE ALABAMA ETHICS COMMISSION

FORMAL COMPLAINT

COMPLAINANT:

Kenneth R. McFeeters
421 19th ST N
Bessemer, AL 35020
205-243-1815

Ken35216@yahoo.com

RESPONDENT:

Tommy Tuberville

I. INTRODUCTION

This Complaint is submitted pursuant to the authority of the Alabama Ethics Commission to investigate violations of the Alabama Ethics Law and the Fair Campaign Practices Act.

The Complainant alleges that Senator Tommy Tuberville has used, or permitted the use of, funds from his Alabama gubernatorial campaign account for **personal purposes**, including travel and related expenses in the Florida Panhandle, in violation of Alabama law.

II. FACTUAL ALLEGATIONS

Based on publicly available campaign finance records and reporting:

1. Senator Tuberville has expended approximately **\$3,600** from his Alabama gubernatorial campaign account on expenses incurred in the Florida Panhandle, including but not limited to:
 - Airport charges at or near Destin Executive Airport
 - Transportation services (including 30A Taxi and Shuttle)
 - Fuel purchases
 2. These expenditures occurred in a geographic area—Santa Rosa Beach / Destin, Florida—where Senator Tuberville owns and has long maintained a **personal residence**.
 3. Public reporting and available records do not demonstrate that these expenditures were connected to:
 - Campaign events
 - Fundraising activities
 - Official gubernatorial campaign functions within the State of Alabama
 4. The pattern of expenditures suggests repeated travel to a location associated with personal use, rather than campaign necessity.
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III. APPLICABLE LAW

The Alabama Ethics Commission has defined “personal use” of campaign funds as:

Any use of campaign funds to fulfill a commitment, obligation, or expense that exists irrespective of the person’s status as a candidate or officeholder.

Additionally, Commission guidance provides that campaign expenditures for travel must be:

- **Actual and necessary**, and
 - Incurred for activities where *but for the individual’s status as a candidate or officeholder*, the expense would not have been incurred
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IV. BASIS FOR VIOLATION

The expenditures described herein raise substantial concerns that they constitute **impermissible personal use** of campaign funds:

- Travel to a personally owned residence is an expense that exists **irrespective of candidacy**
- No documented campaign-related purpose appears to justify the expenditures
- The nature of the expenses (transportation, airport fees, fuel) is consistent with **personal travel**

Under the Commission’s “irrespective test,” such expenditures are presumptively personal unless clearly tied to campaign activity.

Further, as emphasized in Advisory Opinion 2017-05, campaign funds must be used in connection with a **specific candidacy and for that purpose**, reinforcing the requirement that expenditures be directly related to campaign activity.

V. REQUEST FOR INVESTIGATION

The Complainant respectfully requests that the Alabama Ethics Commission:

1. Initiate a **formal investigation** into the use of Senator Tuberville’s Alabama gubernatorial campaign funds
 2. Subpoena and review:
 - Detailed campaign expenditure records
 - Travel justifications and itineraries
 - Any documentation demonstrating campaign-related purpose for the expenditures
 3. Determine whether the expenditures constitute **personal use of campaign funds in violation of Alabama law**
 4. Impose any appropriate **civil penalties or referrals** as authorized by law
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VI. SUPPORTING MATERIALS

The following materials are submitted or incorporated by reference:

- Public campaign finance filings from the Alabama Secretary of State
- Public reporting detailing the expenditures and travel patterns
- Any additional documentation obtained by the Complainant

VII. VERIFICATION

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Signature: _____

Printed Name: _____

Date: _____

NOTARY ACKNOWLEDGMENT

(State of Alabama)

(County of Jefferson)

Subscribed and sworn before me on this 2nd day of April, 2026

Notary Public: _____

My Commission Expires: 9/4/28

Please note that there's a distinct possibility he's spent more for airfare and such, but those expenses are reported with the corporate headquarters address, not destination/departure.





Expenditure Detail

Expenditure Detail

Committee Name THOMAS H TUBERVILLE	Report Schedule 2026 ELECTION CYCLE - Monthly - 03/03/2026	Committee ID 31625
Address 519 DOLPHIN DR	City, State PANAMA CITY BEACH, FL	Zip Code 32413
Reporting Period 02/01/2026 - 02/28/2026	Committee Type Principal Campaign Committee	Filing Due 03/03/2026
Purpose Transportation	Expense Date 02/26/2026	Amount \$177.94
Expenditure Type Itemized Line of Credit Expenditure	Payee Type Group/Business/Corporatio n	Payee 30A TAXI AND SHUTTLE
Description		



Expenditure Detail

Expenditure Detail

Committee Name THOMAS H TUBERVILLE	Report Schedule 2026 ELECTION CYCLE - Monthly - 03/03/2026	Committee ID 31625
Address 1001 AIRPORT RD	City, State DESTIN, FL	Zip Code 32541
Reporting Period 02/01/2026 - 02/28/2026	Committee Type Principal Campaign Committee	Filing Due 03/03/2026
Purpose Transportation	Expense Date 02/12/2026	Amount \$1,108.60
Expenditure Type Itemized Line of Credit Expenditure	Payee Type Group/Business/Corporatio n	Payee DESTIN EXECUTIVE AIRPORT
Description		



Expenditure Detail

Expenditure Detail

Committee Name THOMAS H TUBERVILLE	Report Schedule 2026 ELECTION CYCLE - Monthly - 02/03/2026	Committee ID 31625
Address 1001 AIRPORT RD	City, State DESTIN, FL	Zip Code 32541
Reporting Period 01/01/2026 - 01/31/2026	Committee Type Principal Campaign Committee	Filing Due 02/03/2026
Purpose Transportation	Expense Date 01/02/2026	Amount \$765.94
Expenditure Type Itemized Line of Credit Expenditure	Payee Type Group/Business/Corporatio n	Payee DESTIN EXECUTIVE AIRPORT
Description		



Expenditure Detail

Expenditure Detail

Committee Name THOMAS H TUBERVILLE	Report Schedule 2026 ELECTION CYCLE - Monthly - 01/05/2026	Committee ID 31625
Address 1001 AIRPORT RD	City, State DESTIN, FL	Zip Code 32541
Reporting Period 12/01/2025 - 12/31/2025	Committee Type Principal Campaign Committee	Filing Due 01/05/2026
Purpose Transportation	Expense Date 12/01/2025	Amount \$765.94
Expenditure Type Itemized Line of Credit Expenditure	Payee Type Group/Business/Corporatio n	Payee DESTIN EXECUTIVE AIRPORT
Description		



Expenditure Detail

Expenditure Detail

Committee Name THOMAS H TUBERVILLE	Report Schedule ELECTION CYCLE - Monthly - 12/02/2025	Committee ID 31625
Address 1001 Airport Rd	City, State Destin, FL	Zip Code 32541
Reporting Period 11/01/2025 - 11/30/2025	Committee Type Principal Campaign Committee	Filing Due 12/02/2025
Purpose Transportation	Expense Date 11/04/2025	Amount \$765.94
Expenditure Type Itemized Line of Credit Expenditure	Payee Type Group/Business/Corporatio n	Payee Destin Executive Airport
Description		



Expenditure Detail

Expenditure Detail

Committee Name THOMAS H TUBERVILLE	Report Schedule 2026 ELECTION CYCLE - Monthly - 10/02/2025	Committee ID 31625
Address 220 Partin Dr N	City, State Niceville, FL	Zip Code 32578
Reporting Period 09/01/2025 - 09/30/2025	Committee Type Principal Campaign Committee	Filing Due 10/02/2025
Purpose Administrative	Expense Date 09/03/2025	Amount \$46.12
Expenditure Type Non-Itemized Line of Credit Expenditure	Payee Type Group/Business/Corporatio n	Payee 76 Big Boss Store
Description		