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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

REPORT

Review No. 23-9819

The Board of the Office of Congressional Ethics (hereafter “the Board”), by a vote of no less than four members, on March 15, 2024, adopted the following report and ordered it to be transmitted to the Committee on Ethics of the United States House of Representatives (hereafter “the Committee”).

SUBJECT: Rep. Ronny Jackson

NATURE OF THE ALLEGED VIOLATION: Rep. Ronny Jackson’s campaign committee, Texans for Ronny Jackson, reported campaign disbursements that may not be legitimate and verifiable campaign expenditures attributable to bona fide campaign or political purposes. If Rep. Jackson converted campaign funds from Texans for Ronny Jackson to personal use, or if Rep. Jackson’s campaign committee expended funds that were not attributable to bona fide campaign or political purposes, then Rep. Jackson may have violated House rules, standards of conduct, and federal law.

RECOMMENDATION: The Board recommends that the Committee further review the above allegation concerning Rep. Jackson because there is substantial reason to believe that Rep. Jackson converted campaign funds from Texans for Ronny Jackson to personal use or Rep. Jackson’s campaign committee expended funds that were not attributable to bona fide campaign or political purposes.

VOTES IN THE AFFIRMATIVE: 6

VOTES IN THE NEGATIVE: 0

ABSTENTIONS: 0

MEMBER OF THE BOARD OR STAFF DESIGNATED TO PRESENT THIS REPORT TO THE COMMITTEE: Omar S. Ashmawy, Staff Director & Chief Counsel.

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FINDINGS OF FACT AND CITATIONS TO LAW

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OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 23-9819

On March 15, 2024, the Board of the Office of Congressional Ethics (hereafter “the Board”) adopted the following findings of fact and accompanying citations to law, regulations, rules and standards of conduct (*in italics*).

I. INTRODUCTION

A. Summary of Allegations

1. Rep. Ronny Jackson’s campaign committee, Texans for Ronny Jackson, reported campaign disbursements that may not be legitimate and verifiable campaign expenditures attributable to bona fide campaign or political purposes. If Rep. Jackson converted campaign funds from Texans for Ronny Jackson to personal use, or if Rep. Jackson’s campaign committee expended funds that were not attributable to bona fide campaign or political purposes, then Rep. Jackson may have violated House rules, standards of conduct, and federal law.
2. The Board recommends that the Committee on Ethics of the United States House of Representatives (“Committee”) further review the above allegation concerning Rep. Jackson because there is substantial reason to believe that Rep. Jackson converted campaign funds from Texans for Ronny Jackson to personal use or that Rep. Jackson’s campaign committee expended funds that were not attributable to bona fide campaign or political purposes.

B. Jurisdictional Statement

3. The allegations that were the subject of this review concern Rep. Jackson, a Member of the United States House of Representatives from the 13th Congressional District of Texas. The Resolution the United States House of Representatives adopted creating the Office of Congressional Ethics (“OCE”) directs that, “[n]o review shall be undertaken ... by the [B]oard of any alleged violation that occurred before the date of adoption of this resolution.”¹ The House adopted this Resolution on March 11, 2008. Because the conduct under review occurred after March 11, 2008, review by the Board is in accordance with the Resolution.

¹ H. Res. 895 of the 110th Congress § 1(e) (2008) (as amended) (hereafter the “Resolution”).

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C. Procedural History

4. The OCE received a written request for a preliminary review in this matter signed by at least two members of the Board on December 6, 2023. The preliminary review commenced on December 7, 2023.²
5. On December 12, 2023, the OCE notified Rep. Jackson of the initiation of the preliminary review, provided him with a statement of the nature of the review, notified him of his right to be represented by counsel in this matter, and notified him that invoking his right to counsel would not be held negatively against him.³
6. At least three members of the Board voted to initiate a second-phase review in this matter on January 5, 2024. The second-phase review commenced on January 6, 2024.⁴ The second-phase review was scheduled to end on February 19, 2024.
7. On January 8, 2024, the OCE notified Rep. Jackson of the initiation of the second-phase review in this matter, and again notified him of his right to be represented by counsel in this matter, and that invoking that right would not be held negatively against him.⁵
8. The Board voted to extend the second-phase review by an additional period of fourteen days on February 16, 2024. The additional period concluded on March 5, 2024.
9. The Board voted to refer the matter to the Committee for further review and adopted these findings on March 15, 2024.
10. The report and its findings in this matter were transmitted to the Committee on March 21, 2024.

D. Summary of Investigative Activity

11. The OCE requested documentary and in some cases testimonial information from the following sources:
 - (1) Rep. Jackson; and
 - (2) The Amarillo Club.
12. The following individuals refused to cooperate with the OCE's review:

² A preliminary review is "requested" in writing by members of the Board of the OCE. The request for a preliminary review is received by the OCE on a date certain. According to the Resolution, the timeframe for conducting a preliminary review is 30 days from the date of receipt of the Board's request.

³ The OCE contacted Rep. Jackson's counsel on December 7, 2023 and was not able to confirm representation until December 12, 2023. *See* Letter from Omar S. Ashmawy, Chief Counsel and Staff Dir., Office of Cong. Ethics, to Rep. Jackson (Dec. 7, 2023).

⁴ According to the Resolution, the Board must vote (as opposed to make a written authorization) on whether to conduct a second-phase review in a matter before the expiration of the 30-day preliminary review. If the Board votes for a second phase, the second phase commences the day after the preliminary review ends.

⁵ Letter from Omar S. Ashmawy, Chief Counsel and Staff Dir., Office of Cong. Ethics, to Rep. Jackson (Jan. 8, 2024).

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- (1) Rep. Jackson; and
- (2) The Amarillo Club.

II. REP. JACKSON MAY HAVE CONVERTED CAMPAIGN FUNDS TO PERSONAL USE

A. Applicable Law, Rules, and Standards of Conduct

13. Federal Law

52 U.S.C. § 30114(b)(1)

“A contribution or donation [to a Member of Congress] shall not be converted by any person to personal use.”

11 C.F.R. § 113.1(g)(1)(i) Personal Use Definition

“Personal use means any use of funds in a campaign account of a present or former candidate to fulfill a commitment, obligation or expense of any person that would exist irrespective of the candidate’s campaign or duties as a Federal officeholder. . . .”

Personal use includes but is not limited to the use of funds in a campaign account for any item listed in paragraphs (g)(1)(i)(A) through (J) of this section . . .

(G) Dues, fees or gratuities at a country club, health club, recreational facility or other nonpolitical organization, unless they are part of the costs of a specific fundraising event that takes place on the organization’s premises.”

60 Fed. Reg. 7861, 7866 (Feb. 9, 1995), Final Rule Re: Personal Use of Campaign Funds – Discussion Regarding Spending on Club Dues

“Paragraph (g)(1)(i)(G) of the final rules provides that using campaign funds to pay dues, fees or gratuities to a country club, health club, recreational facility or other nonpolitical organization is personal use. . . . However, the rule is not so broad as to limit legitimate campaign related or officeholder related activity. The costs of a fundraising event held on club premises are no different under the FECA than the costs of a fundraiser held at another location, so the rule contains and [sic] exception that indicates that payments for these costs are not personal use. However, this exception does not cover payments made to maintain unlimited access to such a facility, even if access if [sic] maintained to facilitate fundraising activity. The exception is limited to payments for the costs of a specific fundraising event.”⁶

⁶ “The rule also allows a candidate or officeholder to use campaign funds to pay membership dues in an organization that may have political interests. This would include community or civic organizations that a candidate or officeholder joins in his or her district in order to maintain political contacts with constituents or the business community.” Personal Use of Campaign Funds, 60 Fed. Reg. 7861, 7866 (Feb. 9, 1995). In an advisory opinion, the Federal Election Commission (“FEC”) explained that campaign payments for membership dues at a private club facility (the Washington Athletic Club of Seattle) were impermissible even when the purpose of the membership was “primarily to have access to Club facilities for campaign purposes.” FEC Advisory Op. 1995-26 (Aug. 18, 1995) (citing Personal Use of Campaign Funds, 60 Fed. Reg. 7861, 7866 (Feb. 9, 1995)).

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14. House Rules

House Rule 23, clause 6 states: “A Member, Delegate, or Resident Commissioner— (a) shall keep the campaign funds of such individual separate from the personal funds of such individual; (b) may not convert campaign funds to personal use in excess of an amount representing reimbursement for legitimate and verifiable campaign expenditures; and (c) except as provided in clause 1(b) of rule XXIV, may not expend funds from a campaign account of such individual that are not attributable to bona fide campaign or political purposes.”

15. House Ethics Manual

*The House Ethics Manual states, “Campaign funds are **not** to be used to enhance a Member’s lifestyle, or to pay a Member’s personal obligations. Members have wide discretion in determining what constitutes a bona fide campaign or political purpose to which campaign funds and resources may be devoted, but Members have **no** discretion whatsoever to convert campaign funds to personal use. Furthermore, House rules require that Members be able to verify that campaign funds have not been used for personal purposes.”⁷*

“Among the particular uses of campaign funds that are specified in the FEC regulations as constituting an impermissible personal use are payments for the following: . . . Dues, fees or gratuities at a country club, health club, recreational facility or other non-political organization, unless part of the costs of a specific fundraising event[.]”⁸

*With respect to verification, the Manual emphasizes the following: “This requirement that the proper purpose of each outlay be ‘verifiable’ is a commonsense requirement. With the huge number of outlays that Members’ campaigns typically make, often on a nearly continuous basis, the propriety of particular outlays may not be subject to review for months or years after the fact, when recollections as to the circumstances or specific purposes of an outlay may well have faded. Absent a requirement for verification, the prohibition against converting campaign funds to personal use would be nullified in substantial part. Furthermore, the verification requirement should serve to cause Members and their campaign staff to exercise caution in spending campaign funds, and to ensure that no outlay is for an impermissible personal purpose. **Members and their campaign staff should bear in mind that the verification requirement imposed by the House rules is separate from, and in addition to, whatever recordkeeping requirements are imposed by the Federal Election Commission on federal candidates generally**”⁹*

According to the House Ethics Manual, “a Member or employee must take reasonable steps to ensure that any outside organization over which he or she exercises control – including the individual’s own authorized campaign committee ... operates in compliance with applicable law.”¹⁰ Additionally, “[a] Member’s use of campaign funds for federal office is permissible only

⁷ House Ethics Manual (2022) at 182 (emphasis in original).

⁸ *Id.* at 180-81.

⁹ *Id.* at 173-74 (emphasis in original).

¹⁰ *Id.* at 123.

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if it complies with the provisions of both the House Rules and [the Federal Election Campaign Act].”¹¹

The House Ethics Manual further states that “[w]hile FECA and other statutes on campaign activity are not rules of the House, Members and employees must also bear in mind that the House Rules require that they conduct themselves ‘at all times in a manner that shall reflect creditably on the House’ (House Rule 23, clause 1). In addition, the Code of Ethics of Government Service, which applies to House Members and staff, provides in ¶ 2 that government officials should ‘[u]phold the Constitution, laws and legal regulations of the United States and of all governments therein and never be a party to their evasion.’ Accordingly, in violating FECA or another provision of statutory law, a Member or employee may also violate these provisions of the House rules and standards of conduct”¹²

B. Rep. Jackson May Have Converted Campaign Funds to Personal Use

16. Federal Election Commission (“FEC”) regulations prohibit campaign committees from using campaign funds to secure unlimited access to country clubs, health clubs, recreational facilities, and other non-political organizations.¹³ In this review, the OCE found that Rep. Jackson’s campaign committee, Texans for Ronny Jackson, continued to use campaign funds to pay for unlimited access to the Amarillo Club, a private dining club located in Amarillo, Texas—despite Rep. Jackson being aware of the OCE’s December 2021 referral finding substantial reason to believe that the dues payments were not legitimate and verifiable campaign expenditures.¹⁴
17. In the period of time since the OCE’s December 17, 2021 referral, the Committee has continued to review the OCE’s referral pursuant to Committee Rule 18(a) and has offered no additional guidance on Rep. Jackson’s membership payments or enjoyment of the private club.¹⁵ In this time, Rep. Jackson has continued to make payments to the club undeterred. In light of the enduring use of campaign funds for this purpose, the OCE opened this review.
18. In the present OCE investigation, Rep. Jackson referred to the not-yet-resolved Committee 18(a) review as a reason not to cooperate with the OCE.¹⁶ In response to the OCE’s requests for information, Rep. Jackson’s counsel provided the OCE with various invoice statements confirming payments to the Amarillo Club. However, Rep. Jackson’s counsel also communicated to the OCE that a response would not be provided because—in their view—the present inquiry was merely an extension of the previous investigation and that Rep.

¹¹ *Id.* at 152 (emphasis in original).

¹² House Ethics Manual at 132.

¹³ *See supra*, Section II.A.

¹⁴ *See* In the Matter of Ronny Jackson, Off. of Cong. Ethics, Dec. 17, 2021; *see also* Statement of the Chairman and Ranking Member of the Committee on Ethics regarding Representative Ronny Jackson, dated May 23, 2022. According to the statement, the Chairman and Ranking Member said they would further review the matter pursuant to Committee Rule 18(a).

¹⁵ *Id.*

¹⁶ Email between Justin Clark, Counsel to Rep. Jackson and Docketrel Cromartie, Investigative Counsel, Office of Congressional Ethics, Jan. 9, 2024.

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Jackson intended to reassert all of the arguments made in his official response to the prior OCE matter.¹⁷

19. Ultimately, Rep. Jackson declined to interview or provide any additional documents or testimony. Additionally, and in contrast to the prior review, the Amarillo Club refused to provide documents to the OCE.

i. Rep. Jackson's Amarillo Club Membership

20. As previously described in the OCE's 2021 referral, the Amarillo Club is a private, non-profit social club housed on the top two floors of the FirstBank Southwest Tower in Amarillo, Texas, that provides its members with numerous benefits, including fine dining, access to club events, a yoga room, a gym, and meeting room spaces.¹⁸ Additionally, the Amarillo Club is affiliated with Invited, a national network of private golf, country, city, and stadium clubs.¹⁹ Amarillo Club members receive reciprocal privileges at Invited properties and golf courses throughout the United States.²⁰

21. The Amarillo Club describes itself as a place where members can “enjoy a fantastic view as they wine and dine . . . in the heart of downtown Amarillo. For more than 70 years, the Amarillo Club has been the destination for romantic evenings, life event celebrations, business meetings, civic organizations and much more.”²¹ It also advertises “luxury service,” an “elegant ambiance,” and the opportunity to eat in a “newly remodeled upscale dining room, all while taking in a West Texas sunset.”²²

22. As the OCE outlined in its December 2021 referral, documents obtained by the OCE confirmed Texans for Ronny Jackson routinely made payments to the Amarillo Club between October 2020 and September 2021.²³ These payments included monthly payments in the amount of \$175.37 for “Membership Food/Beverage,” “Dues,” and “Membership Fees.”²⁴ The OCE Board found there was substantial reason to believe that Rep. Jackson converted campaign funds to personal use or that the campaign expended funds not attributable to bona

¹⁷ In an email, dated January 3, 2024, Counsel explained to the OCE that since the previous matter had yet to be adjudicated by the Committee, Representative Jackson viewed the current review as the same matter. As a result, Counsel said that Rep. Jackson intended to take the same position. Email between Justin Clark, Counsel to Rep. Jackson and Docketrel Cromartie, Investigative Counsel, Office of Congressional Ethics, Jan. 3, 2024.

¹⁸ See Amarillo Club, *Membership Benefits*, <https://amarilloclub.com/membership-benefits> (last visited Feb. 27, 2024); Amarillo Club, *Reciprocal Clubs*, <https://amarilloclub.com/reciprocal-clubs> (last visited Feb. 27, 2024); Amarillo Club, *Membership Categories*, <https://amarilloclub.com/membership-categories> (last visited Feb. 27, 2024); Amarillo Club, *About*, <https://amarilloclub.com/about> (last visited Feb. 27, 2024).

¹⁹ Amarillo Club, *Membership Benefits*, <https://amarilloclub.com/membership-benefits> (last visited Feb. 27, 2024); Amarillo Club, *Reciprocal Clubs*, <https://amarilloclub.com/reciprocal-clubs> (last visited Feb. 27, 2024); Amarillo Club, *Membership Categories*, <https://amarilloclub.com/membership-categories> (last visited Feb. 27, 2024); see also Invited, *Home Page*, <https://www.invitedclubs.com> (last visited Feb. 27, 2024).

²⁰ Amarillo Club, *Membership Benefits*, <https://amarilloclub.com/membership-benefits> (last visited Feb. 27, 2024); Amarillo Club, *Reciprocal Clubs*, <https://amarilloclub.com/reciprocal-clubs> (last visited Feb. 27, 2024); Amarillo Club, *Membership Categories*, <https://amarilloclub.com/membership-categories> (last visited Feb. 27, 2024).

²¹ Amarillo Club, *About*, <https://amarilloclub.com/about> (last visited Feb. 27, 2024).

²² Amarillo Club, *Home*, <https://amarilloclub.com/> (last visited Feb. 27, 2024).

²³ See In the Matter of Ronny Jackson, Off. of Cong. Ethics, Dec. 17, 2021.

²⁴ *Id.* at 8.

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vide campaign or political purposes. The House Ethics Committee released the OCE's referral concerning these payments on May 23, 2022.²⁵

23. Instead of halting the expenditure of campaign funds toward membership at the social club, Rep. Jackson's campaign continued to make consistent payments to the Amarillo Club. Following the release of the OCE's report, the description of those disbursements did, however, change gradually over time. Texans for Ronny Jackson initially described the monthly payments as "Registration Fees," but soon began characterizing the disbursements as "Membership Fees," "Food/Beverage," "Membership Fees Food/Beverage Site Fee," "Membership Dues," "Membership for Exclusive Campaign Purposes," "Membership for Exclusive Campaign Purposes Food/Beverage," and "Membership for Exclusive Campaign Purposes."²⁶
24. FEC reports show Texans for Ronny Jackson continued to make monthly payments to the Amarillo Club for dues in all FEC filings available after the OCE's prior referral.²⁷

²⁵ See Statement of the Chairman and Ranking Member of the Committee on Ethics regarding Representative Ronny Jackson, dated May 23, 2022.

²⁶ See Texans for Ronny Jackson FEC Reports of Receipts and Disbursements Descriptions, including: Texans for Ronny Jackson, FEC 2021 Year-End Report of Receipts and Disbursements, filed Jan. 31, 2022 at 2777; Texans for Ronny Jackson, FEC 12-Day Pre-Election Report for the 2022 Primary Report of Receipts and Disbursements, filed Feb. 17, 2022 at 1092; Texans for Ronny Jackson, FEC July 2022 Quarterly Report of Receipts and Disbursements, filed Jul. 15, 2022 at 3349-50; Texans for Ronny Jackson, 30-Day Post-General Election FEC Report of Receipts and Disbursements, filed Dec. 08, 2022 at 1733; Texans for Ronny Jackson, FEC October 2022 Quarterly Report of Receipts and Disbursements, filed Oct. 14, 2022 at 5453; Texans for Ronny Jackson, 12-Day Pre-General Election FEC Report of Receipts and Disbursements, filed Oct. 27, 2022 at 1048; Texans for Ronny Jackson, FEC April 2022 Quarterly Report of Receipts and Disbursements, filed Nov. 27, 2022 at 1470; Texans for Ronny Jackson, FEC April 2023 Quarterly Report of Receipts and Disbursements, filed Apr. 14, 2023 at 2508-09; Texans for Ronny Jackson, FEC July 2023 Quarterly Report of Receipts and Disbursements, filed Jul. 14, 2023 at 6300; Texans for Ronny Jackson, FEC October 2023 Quarterly Report of Receipts and Disbursements, filed Oct. 10, 2023 at 9475, 9495, 9514; Texans for Ronny Jackson, FEC 2023 Year-End Report of Receipts and Disbursements, filed Jan. 29, 2024 at 12771, 12791 & 12815; Texans for Ronny Jackson, FEC 12-Day Pre-Election Report for the 2024 Primary Report of Receipts and Disbursements, filed Feb. 21, 2024 at 4380.

²⁷ Chart compiled from Texans for Ronny Jackson FEC Reports of Receipts and Disbursements, including: Texans for Ronny Jackson FEC Reports of Receipts and Disbursements Descriptions, including: Texans for Ronny Jackson, FEC 2021 Year-End Report of Receipts and Disbursements, filed Jan. 31, 2022 at 2777; Texans for Ronny Jackson, FEC 12-Day Pre-Election Report for the 2022 Primary Report of Receipts and Disbursements, filed Feb. 17, 2022 at 1092; Texans for Ronny Jackson, FEC July 2022 Quarterly Report of Receipts and Disbursements, filed Jul. 15, 2022 at 3349-50; Texans for Ronny Jackson, 30-Day Post-General Election FEC Report of Receipts and Disbursements, filed Dec. 08, 2022 at 1733; Texans for Ronny Jackson, FEC October 2022 Quarterly Report of Receipts and Disbursements, filed Oct. 14, 2022 at 5453; Texans for Ronny Jackson, 12-Day Pre-General Election FEC Report of Receipts and Disbursements, filed Oct. 27, 2022 at 1048; Texans for Ronny Jackson, FEC April 2022 Quarterly Report of Receipts and Disbursements, filed Nov. 27, 2022 at 1470; Texans for Ronny Jackson, FEC April 2023 Quarterly Report of Receipts and Disbursements, filed Apr. 14, 2023 at 2508-09; Texans for Ronny Jackson, FEC July 2023 Quarterly Report of Receipts and Disbursements, filed Jul. 14, 2023 at 6300; Texans for Ronny Jackson, FEC October 2023 Quarterly Report of Receipts and Disbursements, filed Oct. 10, 2023 at 9475, 9495, 9514; Texans for Ronny Jackson, FEC 2023 Year-End Report of Receipts and Disbursements, filed Jan. 29, 2024 at 12771, 12791 & 12815; Texans for Ronny Jackson, FEC 12-Day Pre-Election Report for the 2024 Primary Report of Receipts and Disbursements, filed Feb. 21, 2024 at 4380.

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Date	FEC Disbursement Description	Amount
10/12/2021	Registration Fees	\$175.37
11/15/2021	Registration Fees	\$175.37
12/13/2021	Registration Fees	\$175.37
1/12/2022	Food/Beverage	\$175.36
2/10/2022	Membership Fees	\$175.36
3/9/2022	Membership Fees	\$175.36
4/13/2022	Food/Beverage	\$175.36
5/11/2022	Food/Beverage	\$175.36
6/10/2022	Food/Beverage	\$175.36
7/11/2022	Membership Fees	\$175.36
8/11/2022	Membership Fees	\$175.36
9/12/2022	Membership Fees Food/Beverage Site Fee	\$870.28
10/11/2022	Membership Fees	\$175.36
11/14/2022	Membership Fees	\$175.36
12/12/2022	Membership Fees	\$175.36
1/10/2023	Membership Fees	\$175.36
2/13/2023	Membership Fees	\$175.36
3/10/2023	Membership Fees	\$175.36
4/10/2023	Membership for Exclusive Campaign Purposes	\$175.36
5/10/2023	Membership for Exclusive Campaign Purposes	\$175.36
6/12/2023	Membership for Exclusive Campaign Purposes Food/Beverage	\$591.47
7/11/2023	Membership for Exclusive Campaign Purposes	\$175.36
8/11/2023	Membership for Exclusive Campaign Purposes	\$175.36
9/11/2023	Membership for Exclusive Campaign Purposes	\$175.36
10/10/2023	Membership for Exclusive Campaign Purposes	\$175.36
11/10/2023	Membership for Exclusive Campaign Purposes	\$175.36
12/11/2023	Membership for Exclusive Campaign Purposes	\$175.36
1/11/2024	Membership for Exclusive Campaign Purposes	\$175.36

25. The Amarillo Club generates monthly billing statements for its members, and the OCE obtained Rep. Jackson’s billing statements from October 2021 through September 2023.²⁸ As discussed in more detail below, these billing statements, when compared against the

²⁸ Rep. Jackson Amarillo Club Monthly Billing Statements (Exhibit 1 at 23-9819_0002-41).

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campaign committee's FEC filings through February 2024, indicate that the campaign
committee pays for Rep. Jackson's dues, fees, meals, and other activities at the club.²⁹

26. As explained in the December 2021 OCE referral, Rep. Jackson joined the Amarillo Club in October 2020 as a resident member, and he has continued to use campaign funds to pay a membership fees.³⁰ Rep. Jackson's membership provides him and his wife with unlimited access to the club's dining rooms, gym, banquet and meeting rooms, club events, and Invited reciprocity benefits.³¹
27. Between October 2021 and January 2024, the campaign committee made twenty-eight monthly dues payments to the club, totaling \$4,910.11.³² In the prior review, during the period beginning October 2020 through September 2021, Texans for Ronny Jackson made eleven monthly dues payments to the club, totaling \$1,929.07.³³ In total, the campaign committee has spent at least \$6,839.18 on membership dues since October 2020.

ii. Rep. Jackson's Use of Amarillo Club Facilities and Amenities

28. In addition to dues and membership fees, Rep. Jackson's monthly billing statements include spending on various Amarillo Club meals and events; however, without Rep. Jackson's

²⁹ Compare Rep. Jackson Amarillo Club Monthly Billing Statements (Exhibit 1 at 23-9819_0002-41) with Texans for Ronny Jackson FEC Reports of Receipts and Disbursements, including: Texans for Ronny Jackson FEC Reports of Receipts and Disbursements Descriptions, including: Texans for Ronny Jackson, FEC 2021 Year-End Report of Receipts and Disbursements, filed Jan. 31, 2022 at 2777; Texans for Ronny Jackson, FEC 12-Day Pre-Election Report for the 2022 Primary Report of Receipts and Disbursements, filed Feb. 17, 2022 at 1092; Texans for Ronny Jackson, FEC July 2022 Quarterly Report of Receipts and Disbursements, filed Jul. 15, 2022 at 3349-50; Texans for Ronny Jackson, 30-Day Post-General Election FEC Report of Receipts and Disbursements, filed Dec. 08, 2022 at 1733; Texans for Ronny Jackson, FEC October 2022 Quarterly Report of Receipts and Disbursements, filed Oct. 14, 2022 at 5453; Texans for Ronny Jackson, 12-Day Pre-General Election FEC Report of Receipts and Disbursements, filed Oct. 27, 2022 at 1048; Texans for Ronny Jackson, FEC April 2022 Quarterly Report of Receipts and Disbursements, filed Nov. 27, 2022 at 1470; Texans for Ronny Jackson, FEC April 2023 Quarterly Report of Receipts and Disbursements, filed Apr. 14, 2023 at 2508-09; Texans for Ronny Jackson, FEC July 2023 Quarterly Report of Receipts and Disbursements, filed Jul. 14, 2023 at 6300; Texans for Ronny Jackson, FEC October 2023 Quarterly Report of Receipts and Disbursements, filed Oct. 10, 2023 at 9475, 9495, 9514; Texans for Ronny Jackson, FEC 2023 Year-End Report of Receipts and Disbursements, filed Jan. 29, 2024 at 12771, 12791 & 12815; Texans for Ronny Jackson, FEC 12-Day Pre-Election Report for the 2024 Primary Report of Receipts and Disbursements, filed Feb. 21, 2024 at 4380. While the disbursements reported to the FEC do not completely align with Amarillo Club billing statements in terms of dates or disbursement descriptions, a comparison of these documents makes clear that the monthly billing statements are paid with campaign funds and any discrepancies are the likely result of inaccurate FEC reporting.

³⁰ See In the Matter of Ronny Jackson, Off. of Cong. Ethics, Dec. 17, 2021 at 8; see also Texans for Ronny Jackson, FEC Report of Receipts and Disbursements.

³¹ Amarillo Club, *Membership Benefits*, <https://amarilloclub.com/membership-benefits> (last visited Feb. 27, 2024).

³² *Id.* While each dues payment is not individually identified in the campaign committee's FEC filings, comparing the Amarillo Club billing statements and FEC filings, the OCE found that Rep. Jackson made a total of three \$175.37 payments and twenty-five \$175.36 payments to the Amarillo Club for dues between October 2021 and January 2024. See Rep. Jackson Amarillo Club Monthly Billing Statements (Exhibit 1 at 23-9819_0002-41); see supra note 29. The OCE determined that the September 12, 2022 and June 12, 2023 disbursements were aggregate payments that included \$175.36 for dues.

³³ See In the Matter of Ronny Jackson, Off. of Cong. Ethics, Dec. 17, 2021 at 8.

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cooperation, the OCE could not determine the extent to which he and his wife use the club's other amenities and benefits.

29. Without cooperation, the OCE also could not determine the extent to which Rep. Jackson uses the club's non-dining amenities (*e.g.*, gym, room rental and conference space, etc.) or whether he utilized any Invited reciprocal benefits. By declining to cooperate, the Amarillo Club inhibited further clarification of Rep. Jackson's use of the club.
30. In summary, between October 2020 and January 2024, Rep. Jackson's campaign committee spent \$11,928.27 at the Amarillo Club for dues, fees, meals, and other services.³⁴ Since Rep. Jackson and employees of the Amarillo Club refused to cooperate with this review, the OCE could not determine to what extent his use of the club and the campaign committee's food and beverage spending at the club was campaign related. Regardless, the campaign committee's payment of monthly dues implicates the prohibition against personal use of campaign funds.
31. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Jackson converted campaign funds from Texans for Ronny Jackson to personal use or that Rep. Jackson's campaign committee expended funds that were not attributable to bona fide campaign or political purposes.

III. CONCLUSION

32. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Jackson converted campaign funds from Texans for Ronny Jackson to personal use or that Rep. Jackson's campaign committee expended funds that were not attributable to bona fide campaign or political purposes.
33. Accordingly, the Board recommends that the Committee further review the above allegation that Rep. Jackson converted campaign funds from Texans for Ronny Jackson to personal use or that Rep. Jackson's campaign committee expended funds that were not attributable to bona fide campaign or political purposes.

IV. INFORMATION THE OCE WAS UNABLE TO OBTAIN AND RECOMMENDATION FOR THE ISSUANCE OF SUBPOENAS

34. The following witnesses, by declining to provide requested information to the OCE, did not cooperate with the OCE review:

³⁴ See In the Matter of Ronny Jackson, Off. of Cong. Ethics, Dec. 17, 2021 at 8 (Chart compiled from Texans for Ronny Jackson FEC Reports of Receipts and Disbursements during the period of October 2020 through September 2021); In the Matter of Ronny Jackson, Off. of Cong. Ethics, Dec. 17, 2021 at 10 (Rep. Jackson Amarillo Club Monthly Billing Statements (Exhibit 2 at 21-4513_0014)); *see also* Rep. Jackson Amarillo Club Monthly Billing Statements (Exhibit 1 at 23-9819_0002-41). The \$11,928.27 total reflects the amount in the Amarillo Club monthly billing statements. As noted in the OCE's December 2021 referral, there were certain discrepancies between the Amarillo Club invoices and the disbursements reported by the campaign committee to the FEC. *See* discussion In the Matter of Ronny Jackson, Off. of Cong. Ethics, Dec. 17, 2021 at 8, note 31. *See also* discussion *supra* note 29. The disbursements by the campaign committee to the Amarillo Club totaled \$11,752.90. *See generally* Texans for Ronny Jackson, FEC Reports of Receipts and Disbursements, 2020 - 2024.

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- a. Rep. Jackson; and
- b. The Amarillo Club.

35. The Board recommends that the Committee issue subpoenas to Rep. Jackson and the Amarillo Club.