

# ELECTIONS, LLC

Attorneys at Law  
Justin R. Clark

E [REDACTED]

January 14, 2022

VIA EMAIL ([REDACTED])

Tom Rust  
Chief Counsel and Staff Director  
U.S. House of Representatives  
Committee on Ethics  
1015 Longworth House Office Building  
Washington, DC 20515-6328

RE: Office of Congressional Ethics Referral No 21-4513

Mr. Rust:

Our firm represents Congressman Ronny Jackson and Texans for Ronny Jackson in connection with the matter referenced above. We are in receipt of your letter dated December 22, 2021 and appreciate the opportunity to respond.

The allegations against Congressman Jackson are based on information contained in publicly available reports filed with the Federal Election Commission by Texans for Ronny Jackson, the principal campaign committee for the Honorable Ronny Jackson. As you are aware, the Federal Election Campaign Act of 1971, as amended (“FECA” or the “Act”) regulates political campaign fundraising and spending and provides the Federal Election Commission (“FEC” or the “Commission”) with jurisdiction to implement and enforce the Act in connection with federal elections. While we believe this matter is more appropriately handled by the FEC, which has not questioned the expenditures at issue, we have provided below a detailed summary of the legitimate campaign activities associated with the expenditures at issue.

Texans for Ronny Jackson purchased a membership at the Amarillo Club in Amarillo, TX in October 2020.<sup>1</sup> The Amarillo Club provides members, among other things, access to free meeting rooms. The campaign purchased the membership, primarily, to use such meeting space for internal and external meetings, including but not limited to fundraising events, for campaign purposes due to the proximity of the Amarillo Club to the campaign’s office. The cost of such membership was determined to be less than the campaign would have spent on renting meeting space on an individual basis. While the campaign has not utilized the meeting space as frequently as originally anticipated, the campaign purpose of the expenditure nevertheless exists.

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<sup>1</sup> It is important to note that several other expenditures were raised before the Office of Congressional Ethics (“OCE”). As those matters were not referred to this Committee, they are not addressed here.

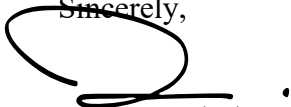
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Included in this response are two exhibits which reflect the use of the membership up to this point by the campaign. On May 4, 2021, the campaign committee hosted a fundraising event at the Amarillo Club. On June 3, 2021, the campaign hosted a roundtable meeting with stakeholders. These expenses appear to be correlated with the June 10, 2021 billing date and June 14, 2021 FEC report date expenditure for \$3,297.43.

Neither Congressman Jackson nor any members of his family have utilized any benefits of the Amarillo Club other than dining and meeting spaces for campaign purposes.

Accordingly, all expenses at issue were made by Texans for Ronny Jackson for campaign purposes.

Sincerely,



Justin R. Clark.

Encl.

**RONNY**   
**JACKSON**  
REPUBLICAN  
— FOR CONGRESS —

**UNDERWRITERS**

KEVIN & RENEE BUSE  
MARK & PAIGE CHANCLER  
MIKE DUDDING & AMY BETH MORRISON  
JERRY & MARGARET HODGE

KEN & JENNIFER KELLEY  
DEAN MORRISON  
SHAWN MORRISON  
DANNY RICHBURG & DR. SUSAN NEESE

CHRIS SCHARBAUER  
JOHNNY & JANA TROTTER  
PLAINS COTTON GROWERS INC. PAC  
TEXAS FARM BUREAU AGFUND

**VICE CHAIRS**

BOB & SUSAN BARRETT  
MICHAEL BEZNER  
DANIEL & SHARON BRADLEY  
KEVIN BUNCH  
PAUL & CLAIRE BURNEY

GEORGE CLIFT  
PAUL DEFOOR  
DR. MIKE FLORES  
KEVIN & BECKY HUDDLESTON  
T.JAY & BROOKE REEVES

VANCE & CINDY REED  
TOM SELL  
TEXAS CORN PAC  
ROSS WILSON

PLEASE JOIN US FOR AN EVENING RECEPTION  
WITH  
**CONGRESSMAN RONNY JACKSON**

TEXAS' 13TH CONGRESSIONAL DISTRICT

**TUESDAY, MAY 4, 2021**

**5:30PM-7:00pm**

AMARILLO CLUB, 30TH FLOOR  
600 S TYLER STREET  
AMARILLO, TEXAS 79101

**UNDERWRITER\***

\$5,800 - COUPLE  
\$2,900 - INDIVIDUAL

**VICE CHAIR\***

\$3,000 - COUPLE  
\$1,500 - INDIVIDUAL

**SUPPORTER**

\$500 - COUPLE  
\$250 - INDIVIDUAL

*\*All host levels listed above will receive special recognition on event materials.*

**Contributions to Texans for Ronny Jackson are Limited to \$2,900 Per Person.**

RSVP BY CONTACTING CALEB MILLER OR SUSAN LILLY AT:

Tel [REDACTED] | [REDACTED] | Fax [REDACTED]

Contributions to Texans for Ronny Jackson are not tax deductible and will be used in connection with federal elections. Federal law requires us to use best efforts to collect and report contributors' names, mailing addresses, occupations, and employers. Contributions must: (i) be made only by U.S. citizens or permanent residents; (ii) not be made from the funds of a corporation, labor organization or national bank; and (iii) be the donor's personal funds, not those of another person or entity.

PAID FOR BY TEXANS FOR RONNY JACKSON

**YES, I/WE WOULD LIKE TO ATTEND THE RECEPTION FOR CONGRESSMAN JACKSON!**

**UNDERWRITER\***  
\$5,800 - COUPLE  
\$2,900 - INDIVIDUAL

**VICE CHAIR\***  
\$3,000 - COUPLE  
\$1,500 - INDIVIDUAL

**SUPPORTER**  
\$500 - COUPLE  
\$250 - INDIVIDUAL

*\*All host levels listed above will receive special recognition on event materials.*

**Contributions to Texans for Ronny Jackson are Limited to \$2,900 Per Person.**

Unfortunately, I/we will not be able to attend but would like to support Congressman Jackson.  
Enclosed is my contribution of \$\_\_\_\_\_.

NAME \_\_\_\_\_

ADDRESS \_\_\_\_\_

CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_

PHONE:  Cell  Work  Other \_\_\_\_\_ EMAIL \_\_\_\_\_

OCCUPATION \_\_\_\_\_ EMPLOYER \_\_\_\_\_

SPOUSE'S NAME (if joint contribution) \_\_\_\_\_

SPOUSE'S OCCUPATION \_\_\_\_\_ SPOUSE'S EMPLOYER \_\_\_\_\_

**Please make checks payable to Texans for Ronny Jackson and mail to:**

Texans for Ronny Jackson  
P.O. Box 53058  
Amarillo, TX 79159

PLEASE CHARGE MY CARD \$ \_\_\_\_\_  VISA  MASTERCARD  AMERICAN EXP  DISCOVER

CARD NO. \_\_\_\_\_ EXPIRATION DATE \_\_\_\_\_ SECURITY CODE \_\_\_\_\_

NAME ON CARD \_\_\_\_\_ SIGNATURE \_\_\_\_\_

SPOUSE SIGNATURE (if joint contribution) \_\_\_\_\_

Contributions to Texans for Ronny Jackson are not tax deductible and will be used in connection with federal elections. Federal law requires us to use best efforts to collect and report contributors' names, mailing addresses, occupations, and employers. Contributions must: (i) be made only by U.S. citizens or permanent residents; (ii) not be made from the funds of a corporation, labor organization or national bank; and (iii) be the donor's personal funds, not those of another person or entity.

Paid political advertisement paid for by Texans for Ronny Jackson, P.O. Box 53058, Amarillo, TX 79159

PAID FOR BY TEXANS FOR RONNY JACKSON

11:05

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## Event Details

# Amarillo Matters Meeting - RJ and JB meeting with Shawn Morrison, Jason Herrick, Trevor Caviness, Andrew Hall and Richard Brown (Food will be provided)

1:00PM - 2:00PM CT - Happy State Bank Room - Amarillo Club - 600 S Tyler St. Unit 3000 Amarillo, 79101



Call

Thursday, Jun 3, 2021

from 1 PM to 2 PM

Noon

Texas GOP...

10:30AM - 12:30PM C  
VERO Building - West