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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. 23-9812

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. Wesley Hunt

NATURE OF THE ALLEGED VIOLATION: Rep. Wesley Hunt’s campaign committee, Hunt for Congress, reported campaign disbursements that may not be legitimate and verifiable campaign expenditures attributable to bona fide campaign or political purposes. If Rep. Hunt converted campaign funds from Hunt for Congress to personal use, or if Rep. Hunt’s campaign committee expended funds that were not attributable to bona fide campaign or political purposes, then Rep. Hunt 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. Hunt because there is substantial reason to believe that Rep. Hunt converted campaign funds from Hunt for Congress to personal use or Rep. Hunt’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. 23-9812

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. Wesley Hunt’s campaign committee, Hunt for Congress, reported campaign disbursements that may not be legitimate and verifiable campaign expenditures attributable to bona fide campaign or political purposes. If Rep. Hunt converted campaign funds from Hunt for Congress to personal use, or if Rep. Hunt’s campaign committee expended funds that were not attributable to bona fide campaign or political purposes, then Rep. Hunt 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. Hunt because there is substantial reason to believe that Rep. Hunt converted campaign funds from Hunt for Congress to personal use or that Rep. Hunt’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. Hunt, a Member of the United States House of Representatives from the 38th 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 8, 2023, the OCE notified Rep. Hunt 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. Hunt 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 25, 2024.

D. Summary of Investigative Activity

11. The OCE requested documentary and in some cases testimonial information from the following sources:
 - (1) Rep. Hunt;
 - (2) Emily Hunt;
 - (3) James Kyrkanides;
 - (4) Grayson Hillburn; and
 - (5) The Post Oak Hotel (owned by Landry's Inc.).
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 See Letter from Omar S. Ashmawy, Chief Counsel and Staff Dir., Office of Cong. Ethics, to Rep. Hunt (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. Hunt (Jan. 8, 2024).

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- (1) Rep. Hunt;
- (2) Emily Hunt;
- (3) James Kyrkanides; and
- (4) Grayson Hillburn.

II. REP. HUNT 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

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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 staffs to exercise caution in spending campaign funds, and to ensure that no outlay is for an impermissible personal purpose. **Members and their campaign staffs 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

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)).

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

⁸ *Id.* at 180-81.

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

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*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 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. Hunt 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 Accordingly, payments of club dues or membership fees are *per se* personal use under FEC regulations.
17. In this review, the OCE found that Rep. Hunt's campaign committee, Hunt for Congress, used campaign funds to pay for exclusive access to the Oak Room, a private social club in Houston, Texas.
18. After initially producing some limited information to the OCE, Rep. Hunt refused to cooperate with this review.¹⁴ In response to the OCE's requests for information, Rep. Hunt's counsel provided the OCE with certain documents and communications related to the use of the Post Oak Hotel and the Oak Room. However, many of the aforementioned materials contained significant redactions—effectively limiting their evidentiary value.¹⁵
19. Ultimately, Rep. Hunt declined to interview with the OCE or provide all responsive documents; nor did he return a signed certification, as required by OCE rules, affirming that he had not knowingly or willfully withheld, redacted, or otherwise altered the requested information.¹⁶ Rep. Hunt's wife, Emily Hunt; James Kyrkanides, Rep. Hunt's Chief of Staff;

¹⁰ *Id.* at 123.

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

¹² House Ethics Manual at 132.

¹³ *See supra*, Section II.A.

¹⁴ Email between Eric Wang, Counsel to Rep. Hunt and Docktrell Cromartie, Investigative Counsel, Office of Congressional Ethics, Feb. 21, 2024.

¹⁵ Rep. Hunt's counsel provided the OCE with excerpts of conversations, purportedly extracted from text messages found on Rep. Hunt's cellular telephone. Contrary to OCE's data delivery standards, the excerpts contained heavy redactions limiting their evidentiary value.

¹⁶ In conversations and emails with Rep. Hunt's counsel, the OCE explained that it would like to interview Rep. Hunt. The OCE also communicated that it had not received all complete, unredacted materials responsive to the OCE's requests for information or a signed certification affirming that Rep. Hunt had not withheld, redacted, or

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended and Grayson Hilburn, Rep. Hunt's field representative, also refused to participate in interviews.

i. Rep. Hunt's Oak Room Membership

20. The Oak Room is a private social club on the 25th floor of the Post Oak Hotel in Houston, Texas that provides what its website describes as “an elegant and intimate space for social gatherings...[with] exquisite views of the surrounding areas offer[ing] an elevated backdrop for high-class mingling and business meetings.”¹⁷
21. The Post Oak Hotel, a wholly owned subsidiary of Landry's Inc., has a wide range of dining and entertainment experiences.¹⁸ The Post Oak Hotel is described as Texas's “only Forbes five-star hotel and spa,” and offers many luxury amenities to its guests.¹⁹
22. The Oak Room is described by the Post Oak Hotel as, the “[p]remier social club for Houston.”²⁰ Accessible by an elevator with a button that reads “Oak Room, private,” the club is guarded by a concierge staffer and has a strict no-photography rule.²¹ Numerous celebrities have hosted events in the Oak Room.²² According to the Houston Chronicle, members of the Oak Room:

have access . . . six days a week. A few Robert Motherwell drawings hang on the walls. An assortment of Baccarat crystal line the shelves. At capacity, the 3,000-

otherwise altered any information requested in the production. Notwithstanding these efforts, on February 20, 2024, counsel for Rep. Hunt informed the OCE that Rep. Hunt would not sign and return the certification or participate in an interview. Again, on February 21, 2024, counsel reaffirmed by email Rep. Hunt's position against further participation in the OCE's review. See Email between Docktrell Cromartie, Investigative Counsel, Office of Congressional Ethics to Eric Wang, Counsel to Rep. Hunt, Feb. 5, 2024; Email between Docktrell Cromartie, Investigative Counsel, Office of Congressional Ethics to Eric Wang, Counsel to Rep. Hunt, Feb. 14, 2024; Email between Eric Wang, Counsel to Rep. Hunt and Docktrell Cromartie, Investigative Counsel, Office of Congressional Ethics, Feb. 16, 2024; Email between Eric Wang, Counsel to Rep. Hunt and Docktrell Cromartie, Investigative Counsel, Office of Congressional Ethics, Feb. 20, 2024; Email between Eric Wang, Counsel to Rep. Hunt and Docktrell Cromartie, Investigative Counsel, Office of Congressional Ethics, Feb. 21, 2024.

¹⁷ See The Oak Room, *Home Page*, <https://www.theoakroomhouston.com> (last visited Mar. 5, 2024); Landry's Inc., *Home Page*, <https://www.landrysinc.com> (last visited Mar. 5, 2024).

¹⁸ See Landry's Inc., *About*, <https://www.landrysinc.com/about-us> (last visited Mar. 5, 2024).

¹⁹ *Id.*; see also Post Oak Hotel, Amenities, <https://www.thepostoakhotel.com/experience/amenities/> (last visited March 5, 2024); Post Oak Hotel, Post Oak Motor Cars, <https://www.thepostoakhotel.com/experience/post-oak-motor-cars/> (last visited March 5, 2024); Post Oak Hotel, Spa, <https://www.thepostoakhotel.com/wellness/spa/> (last visited March 5, 2024).

²⁰ See The Oak Room, *Home Page*, <https://www.theoakroomhouston.com> (last visited Mar. 5, 2024).

²¹ Amber Elliott, *Inside Tilman Fertitta's members-only club in the Post Oak Hotel, where photos and media are banned*, HOUSTON CHRONICLE, Feb. 28, 2023, available at <https://www.houstonchronicle.com/lifestyle/article/tilman-fertitta-oak-room-parker-mccollum-rodeo-17808644.php>.

²² *Id.* The OCE learned that celebrities occasionally use the venue to launch their new alcohol product, and that Oak Room members might have been invited to attend such events. Investigative Notes to File from Phone Call with Landry's Inc. Deputy General Counsel, January 8, 2024 (on file with OCE). According to the Houston Chronicle, Peyton Manning, Terry Bradshaw, Jon Bon Jovi, Eva Longoria, Kendall Jenner, Kevin Hart, Curtis '50 Cent' Jackson, Bryan Cranston, and Aaron Paul have each hosted events in the Oak Room—all within a twelve-month span preceding February 28, 2023.

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square-foot space can hold approximately 150 guests. The doors remain “open” until the last drink is served.²³

23. Members of the Oak Room have exclusive access to the club, which consists of a large bar and sitting area.²⁴ While it does not have private meeting spaces, the Oak Room is frequently used by its members to conduct business meetings.²⁵ In addition to access to the space, the benefits of Oak Room membership include discounts for rooms at the hotel, free valet parking at the hotel, and invitations to the Oak Room’s social events with celebrities—which may include product launches or private concerts.²⁶
24. Marketing for the Oak Room is conducted entirely through word of mouth. To gain membership, prospective members must be invited to join.²⁷
25. As discussed in more detail below, the campaign committee’s FEC filings indicate that the campaign committee pays for Rep. Hunt’s membership fees and other activities at the Oak Room.²⁸
26. Rep. Hunt joined the Oak Room in March of 2022 as a resident member.²⁹ A single membership to the Oak Room costs \$2,500 plus tax, which amounts to \$2,706.25.³⁰
27. FEC reports show the campaign committee reported disbursing \$250.71 to “The Post Oak – Oak Room” for “Facility Rental” on April 14, 2022.³¹ Hunt for Congress then reported disbursing \$2,706.25 to “the Post Oak Hotel” for “Membership” on April 26, 2022.³² Roughly a year later, the campaign reported making an identical \$2,706.25 disbursement to

²³ *Id.*

²⁴ Investigative Notes to File from Phone Call with Landry’s Inc. Deputy General Counsel, January 8, 2024 (on file with OCE).

²⁵ *Id.*

²⁶ *Id.* Amber Elliott, *Inside Tilman Fertitta’s members-only club in the Post Oak Hotel, where photos and media are banned*, HOUSTON CHRONICLE, Feb. 28, 2023, available at <https://www.houstonchronicle.com/lifestyle/article/tilman-fertitta-oak-room-parker-mccollum-rodeo-17808644.php>. According to the Houston Chronicle, on February 27, 2023, Mr. Fertitta—sole owner of Landry’s Inc.—invited country singer-songwriter Parker McCollum to play a private concert in the Oak Room.

²⁷ Investigative Notes to File from Phone Call with Landry’s Inc. Deputy General Counsel, January 8, 2024 (on file with OCE).

²⁸ See Chart compiled from Hunt for Congress FEC Reports of Receipts and Disbursements Descriptions, including: Hunt for Congress, FEC July 2023 Quarterly Report of Receipts and Disbursements, filed Jul. 15, 2023 at 161; Hunt for Congress FEC Reports of Receipts and Disbursements Descriptions, including: Hunt for Congress, FEC July 2022 Quarterly Report of Receipts and Disbursements, filed Aug. 26, 2022 at 922; Hunt for Congress FEC Reports of Receipts and Disbursements Descriptions, including: Hunt for Congress, FEC July 2022 Quarterly Report of Receipts and Disbursements, filed Aug. 26, 2022 at 1005. Given Rep. Hunt’s refusal to cooperate in this review, the OCE could not verify whether the \$250.71 expenditure was for legitimate campaign purposes or whether the characterization of the expenditure was the result of an accounting error.

²⁹ See Oak Room Welcome Email (Exhibit 1 at 23-9812_0002).

³⁰ See Oak Room Membership Form (Exhibit 2 at 23-9812_0008).

³¹ See Hunt for Congress FEC Reports of Receipts and Disbursements Descriptions, including: Hunt for Congress, FEC July 2022 Quarterly Report of Receipts and Disbursements, filed Aug. 26, 2022 at 1005.

³² See Hunt for Congress FEC Reports of Receipts and Disbursements Descriptions, including: Hunt for Congress, FEC July 2022 Quarterly Report of Receipts and Disbursements, filed Aug. 26, 2022 at 922.

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Disbursements Reported to the FEC By Hunt for Congress

Date	Recipient	FEC Disbursement Description	Amount
4/26/2022	The Post Oak Hotel	Membership	\$2,706.25
4/7/2023	The Post Oak Hotel	Food/Beverages	\$2,706.25

28. Rep. Hunt declined to interview with the OCE, and therefore would not answer specific questions about his use of the club. The OCE also sought to interview Rep. Hunt’s wife and two staffers who may have had direct knowledge of how Rep. Hunt used the club. All three declined to participate in interviews with the OCE.
29. Rep. Hunt produced emails and text messages to the OCE that demonstrated his use of the club for some campaign-related meetings.³⁵ As such, Rep. Hunt’s payments for unlimited use of the Oak Room served at least some campaign purpose. However, Rep. Hunt’s refusal to certify the completeness of his production to the OCE called into question whether there were other documents demonstrating use of the Oak Room for any personal purpose.
30. Additionally, Rep. Hunt’s Oak Room initiation e-mail when he first joined the Oak Room mentioned that he would receive “email or text blasts” for events at the club. Without cooperation from Rep. Hunt, the OCE could not confirm if Rep. Hunt received such notifications. Moreover, without cooperation, the OCE could not determine the extent to which Rep. Hunt may have taken advantage of the Oak Room’s unique events or any hotel parking or room discount benefits.
31. While more information about Rep. Hunt’s usage would provide context to his expenditures, no amount of campaign usage of the Oak Room could overcome the *per se* prohibition against membership payments to maintain unlimited access to such a facility. The OCE found that the Oak Room represents the type of club, facility, or organization to which membership payments from campaign funds are personal use.

ii. Rep. Hunt’s Additional Expenditures at the Post Oak Hotel

32. In addition to membership fees, Rep. Hunt’s campaign committee’s reported FEC disbursements include spending on meals, events, and other services at the Post Oak Hotel.

³³ See Hunt for Congress FEC Reports of Receipts and Disbursements Descriptions, including: Hunt for Congress, FEC July 2023 Quarterly Report of Receipts and Disbursements, filed Jul. 15, 2023 at 161.

³⁴ See Hunt for Congress FEC Reports of Receipts and Disbursements Descriptions, including: Hunt for Congress, FEC July 2022 Quarterly Report of Receipts and Disbursements, filed Aug. 26, 2022 at 1005; Hunt for Congress, FEC July 2022 Quarterly Report of Receipts and Disbursements, filed Aug. 26, 2022 at 922; Hunt for Congress, FEC July 2023 Quarterly Report of Receipts and Disbursements, filed Jul. 15, 2023 at 161.

³⁵ See e.g. Email communications between Rep. Hunt, Mr. Kyrkanides & Unknown Individual (redacted), September 15, 2022—September 16, 2022 (Exhibit 3 at 23-9812_0010-12); Email communications between Ellie Dick, Grayson Hillburn, James Kyrkanides, & Unknown Individual (redacted), July 26, 2023—August 1, 2023 (Exhibit 4 at 23-9812_0014-16).

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Without Rep. Hunt's cooperation, the OCE could not determine the extent to which he and his wife used any of the other benefits available to Oak Room members for hotel room discounts.

33. According to FEC reports, the campaign committee made a large payment of \$43,626.52 to the Post Oak Hotel on November 4, 2022 for "Facility Rental/Catering."³⁶ Soon thereafter, Hunt for Congress made another disbursement to the Post Oak Hotel for \$4,132.44, reportedly to cover similar expenses related to "Catering" on November 7, 2022.³⁷ Because Rep. Hunt declined to cooperate with this review, the OCE could not verify whether the expenditures were for legitimate campaign purposes.
34. In summary, between April 2022 and January 2024, Rep. Hunt's campaign committee reported \$74,525.60 in disbursements to the Post Oak Hotel for fees, meals, and other services.³⁸ Since Rep. Hunt refused to provide certain documents and communications to the OCE or participate in an interview, the OCE could not determine to what extent his use of the club and the campaign committee's overall spending at the Post Oak Hotel was campaign related.
35. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Hunt converted campaign funds from Hunt for Congress to personal use or that

³⁶ See Hunt for Congress, FEC 30-Day Post-Election Report for the 2022 General Election Report of Receipts and Disbursements, filed Dec. 08, 2022 at 476. Email communications between the campaign committee and the Post Oak Hotel, indicate the payment was likely associated with a campaign event, advertised to have been hosted at the Post Oak Hotel on November 8, 2022.

³⁷ See Hunt for Congress, FEC 12-Day Pre-Election Report for the 2022 Primary Report of Receipts and Disbursements, filed Feb. 17, 2022 at 1092. The characterization of November 7, 2022 disbursement does not appear to align with the kind of services the campaign committee received. Contrary to the description represented in FEC filing, documents obtained by the OCE indicate the campaign committee was charged \$4,132.44 for services related to the reservation of approximately eight guestrooms at the Post Oak Hotel—one of which was considerably discounted (approx. 57%). Additionally, the individuals slated to occupy the aforementioned guest rooms included Rep. Hunt's father, Willie Hunt—a local resident of Houston. Given Rep. Hunt's refusal to cooperate, the OCE was unable to determine whether the use of campaign funds to purchase guest rooms for individuals such as Mr. Hunt was a legitimate and verifiable campaign expenditure attributable to bona fide campaign or political purposes. See 11 CFR § 113.1(g)(1)(ii).

³⁸ See Hunt for Congress FEC Reports of Receipts and Disbursements during the period of April 2022 through January 2024, including Hunt for Congress, FEC July 2022 Quarterly Report of Receipts and Disbursements, filed Aug. 26, 2022; Hunt for Congress, 30-day Post-General Election FEC Report of Receipts and Disbursements, filed Dec. 28, 2022; Hunt for Congress, FEC October 2022 Quarterly Report of Receipts and Disbursements, filed Oct. 14, 2022; Hunt for Congress, FEC 12-Day Pre-General Election Report of Receipts and Disbursements, filed Oct. 27, 2022; Hunt for Congress, FEC April 2023 Quarterly Report of Receipts and Disbursements, filed Apr. 14, 2023; Hunt for Congress, FEC July 2023 Quarterly Report of Receipts and Disbursements, filed Jul. 15, 2023; Hunt for Congress, FEC October 2023 Quarterly Report of Receipts and Disbursements, filed Oct. 15, 2023; Hunt for Congress, FEC 2023 Year-End Report of Receipts and Disbursements, filed Jan. 31, 2024. Of note, the OCE did not include the additional disbursements attributed to individual restaurants operating within the Post Oak Hotel (e.g., Willie G's, Craft F&B, H Bar, etc.) in its calculation of Rep. Hunt's campaign committee's overall spending total. The OCE relied upon the accuracy of Rep. Hunt's campaign committee's report of receipts to distinguish the disbursements likely associated with the Post Oak Hotel/Oak Room from those expenditures represented to have been associated to the individual restaurants. Given Rep. Hunt's refusal to cooperate in this review, the OCE could not determine the exact number of disbursements made to the Oak Room or whether the \$74,525.60 in expenditures were for legitimate campaign purposes.

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Rep. Hunt's campaign committee expended funds that were not attributable to bona fide campaign or political purposes.

III. CONCLUSION

36. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Hunt converted campaign funds from Hunt for Congress to personal use or that Rep. Hunt's campaign committee expended funds that were not attributable to bona fide campaign or political purposes.

37. Accordingly, the Board recommends that the Committee further review the above allegation that Rep. Hunt converted campaign funds from Hunt for Congress to personal use or that Rep. Hunt'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

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

- a. Rep. Hunt;
- b. Emily Hunt
- c. James Kyrkanides; and
- d. Grayson Hilburn.

39. The Board recommends that the Committee issue subpoenas to Rep. Hunt, Emily Hunt, James Kyrkanides, Grayson Hilburn.