

RECEIVED
FEDERAL ELECTION
COMMISSION

2014 MAY 16 AM 11:43

OFFICE OF GENERAL
COUNSEL

May 15, 2014

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

MUR # 6822

Re: Violations of the Federal Election Campaign Act by Ratcliffe for Congress

I am in possession of information that suggests Ratcliffe for Congress has accepted at least \$5,000 from an individual who has been deceased for more than five years. If true, the acceptance and expenditure of these funds give rise to serious questions about possible violations of the Federal Election Campaign Act by Ratcliffe for Congress.

According to Ratcliffe for Congress's campaign finance report filed with the Federal Election Commission on February 20, 2014, a "Naomi Jackson" with the address of "5312 Kayway Drive, Greenville, TX 75402" made \$5,000 in contributions on January 13, 2014. <http://docquery.fec.gov/pdf/214/14940533214/14940533214.pdf>. However, according to the attached obituary published in *The Herald Banner* in Greenville, Texas, Naomi Jackson passed away August 2, 2008. Her surviving spouse, Johnny Morgan Jackson, is currently listed at the same address. <http://www.advancedbackgroundchecks.com/d/johnny-jackson/38617994>.

Although it is conceivable for campaigns to unknowingly accept contributions from a deceased individual, it is suspicious and troubling that Ratcliffe for Congress lists Naomi Jackson's occupation and employer as "Retired". It is my understanding that the law requires campaigns to collect and report this information for their contributors, and it appears that Ratcliffe for Congress has violated the law by falsifying such information.

The runoff election for Texas' 4th congressional district will be held May 27, 2014. Therefore, I urge the Commission to immediately investigate this matter and take all actions necessary to remedy these violations. In the meantime, Ratcliffe for Congress should be required to disgorge all illegal contributions that it has received.


Thank you for your attention to this matter.

Sincerely,



Ken Dickson

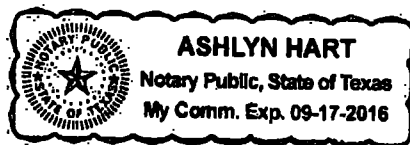
I hereby swear and affirm that the facts presented in this complaint are true to the best of my knowledge, information and belief. Sworn pursuant to 18 U.S.C. §1001.


Ken Dickson

Subscribed and sworn to before me this 15th day of May, 2014.


Notary Public

My Commission expires: 9/17/2016



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**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

2014 MAY 12

Use separate schedule(s)
for each category of the
Detailed Summary Page.

FOR LINE NUMBER: PAGE 9 OF 50

(check only one)

☒ 11a ☐ 11b ☐ 11c ☐ 11d
12 13a 13b 14 15

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Ratcliffe for Congress

Full Name (Last, First, Middle Initial)
Deanne Noel

Mailing Address 11215 Hermosa Court

City State Zip Code
Houston TX 77024-7409

FEC ID number of contributing
federal political committee.

C

Name of Employer
Self

Occupation
Self

Receipt For: 2014

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

2600

Date of Receipt

M M / D D / Y Y Y Y
02 10 2014

Transaction ID : A-CF348

Amount of Each Receipt this Period

2600

Full Name (Last, First, Middle Initial)
Bob Clements

Mailing Address 517 Moraine Way

City State Zip Code
Heath TX 75032-8903

FEC ID number of contributing
federal political committee.

C

Name of Employer
Leon's Texas Cuisine

Occupation
CEO

Receipt For: 2014

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

1000

Date of Receipt

M M / D D / Y Y Y Y
01 12 2014

Transaction ID : A-CF161

Amount of Each Receipt this Period

1000

Full Name (Last, First, Middle Initial)
Naomi Jackson

Mailing Address 5312 Kayway Drive

City State Zip Code
Greenville TX 75402-6408

FEC ID number of contributing
federal political committee.

C

Name of Employer
Retired

Occupation
Retired

Receipt For: 2014

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

5000

Date of Receipt

M M / D D / Y Y Y Y
01 13 2014

Transaction ID : A-CF172

Amount of Each Receipt this Period

2500

SUBTOTAL of Receipts This Page (optional)

6100.00

TOTAL This Period (last page this line number only)

SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

FOR LINE NUMBER: PAGE 9 OF 50

(check only one)

☒ 11a ☐ 11b ☐ 11c ☐ 11d
 12 13a 13b 14 15

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NAME OF COMMITTEE (In Full)

Ratcliffe for Congress

Full Name (Last, First, Middle Initial)

A. Deanne Noel

Mailing Address 11215 Hermosa Court

 City State Zip Code
 Houston TX 77024-7409

FEC ID number of contributing federal political committee.

C

Name of Employer
SelfOccupation
Self

Receipt For: 2014

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

2800

Date of Receipt

 M M / D D / Y Y Y Y
 02 10 2014

Transaction ID : A-CF348

Amount of Each Receipt this Period

2800

Full Name (Last, First, Middle Initial)

B. Bob Clements

Mailing Address 517 Moraine Way

 City State Zip Code
 Heath TX 75032-8903

FEC ID number of contributing federal political committee.

C

Name of Employer
Leon's Texas CuisineOccupation
CEO

Receipt For: 2014

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

1000

Date of Receipt

 M M / D D / Y Y Y Y
 01 12 2014

Transaction ID : A-CF161

Amount of Each Receipt this Period

1000

Full Name (Last, First, Middle Initial)

C. Naomi Jackson

Mailing Address 5312 Kayway Drive

 City State Zip Code
 Greenville TX 75402-6408

FEC ID number of contributing federal political committee.

C

Name of Employer
RetiredOccupation
Retired

Receipt For: 2014

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

5000

Date of Receipt

 M M / D D / Y Y Y Y
 01 13 2014

Transaction ID : A-CF172

Amount of Each Receipt this Period

2500

SUBTOTAL of Receipts This Page (optional)

6100.00

TOTAL This Period (last page this line number only)

The Herald Banner, Greenville, TX

August 4, 2008

Naomi Jackson

Evelyn Naomi Jackson, 66, of Greenville passed away Saturday, Aug. 2, 2008 at her residence. Services are at 10 a.m. Tuesday at Coker-Mathews Funeral Home chapel with Dr. John Tate officiating. Burial will follow at Memoryland Memorial Park.

Visitation is from 6 to 8 p.m. today at the funeral home.

Mrs. Jackson was born Sept. 25, 1941 in Greenville to George Wright Sockwell and Opal May Bell Sockwell. On Sept. 15, 1961, she was married to Johnny Morgan Jackson in Greenville.

She was a housewife, mother, and owned the Love Bug Boutique from 1980 to 1989. She was a member of Central Christian Church and belonged to the Christian Women's Fellowship.

Surviving are her husband, Johnny of Greenville; son, Johnny Jackson, Jr. and wife, Teresa of Allen; daughter, Jennifer Lynn Jackson Bobst and husband, Dan of Heath; grandchildren, Alexis, Brody, and Brianna Bobst of Heath and Ruby Jackson of Allen.

She was preceded in death by her parents and brothers, James Glen Sockwell and George Harle Sockwell, and aunt and uncle, Earl and Ruby Bingham.

Gerald Hall, John Harvey, Doug Jackson, Butch Mitchell, Tim Newland, and Kenneth Peters are pallbearers. Honorary pallbearers are Lynn Jackson, Wayne Jackson, Jeffery Jackson, and Richard Willis.

Family requests memorials be made to the Central Christian Church Window Fund, 2611 Wesley, Greenville, 75401.