

Palm Place Investments, LLC

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OFFICE OF
GENERAL COUNSEL

2022 MAY 18 AM 7:35

May 11, 2022

VIA EMAIL (cela@fec.gov)

Roy Q. Lockett
Federal Election Commission
Office of Complaints Examination & Legal Administration
Attn: Trace Keeys, Paralegal
1050 First Street, NE
Washington, DC 20463
cela@fec.gov

Re: FEC Matter MUR 7986

Dear Mr. Lockett and Ms. Keeys,

We are in receipt of your May 3, 2022 letter indicating that the Federal Election Commission ("FEC") has received a complaint indicating, incorrectly, that Palm Place Investments, LLC ("Palm Place") may have violated the Federal Election Campaign Act of 1971 (the "Act"), and enclosing the complaint. We appreciate the opportunity to respond to this incorrect assertion.

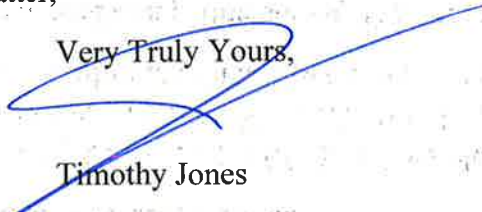
Palm Place is formed as a California Limited Liability Company ("LLC"), and has elected to be treated as a partnership by the Internal Revenue Service pursuant to 26 CFR 301.7701-3. Enclosed, please find as Exhibit A, the Declaration of Timothy Jones confirming Palm Place's tax status.

Under federal law, LLCs that have elected "to be treated as a partnership by the Internal Revenue Service pursuant to 26 CFR 301.7701-3" are permitted to make campaign contributions to candidates. 11 CFR § 110.1(g)(2). Because Palm Place is an LLC that has elected to be treated as a partnership, the complaint is in error and Palm Place has not violated the Act.

Please feel free to contact me if you have any questions or require any further information. As you note in your letter, please maintain the confidentiality of this matter as required by 52 U.S.C. § 30109(a)(4)(B).

Thank you for your time and attention to this matter,

Very Truly Yours,


Timothy Jones

Enclosures: Exhibit A, Declaration of Timothy Jones

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IN RE MATTER OF PALM PLACE INVESTMENTS, LLC CAMPAIGN CONTRIBUTION TO MAGSIG FOR CONGRESS COMMITTEE

Federal Election Commission Matter Under Review No. 7986

DECLARATION OF TIMOTHY JONES

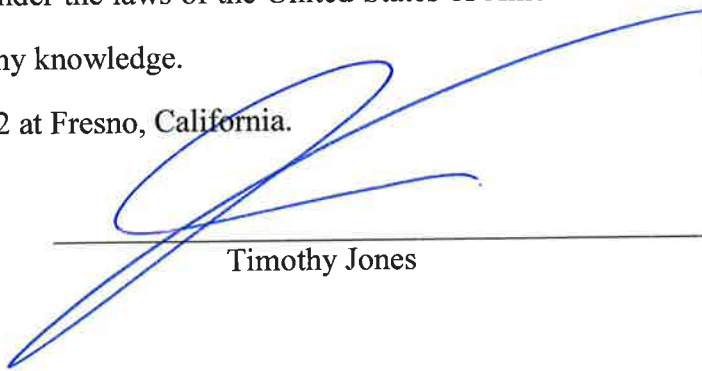
I, Timothy Jones, declare as follows:

1. I have personal knowledge of the facts stated herein, and if called as a witness, could and would testify competently to the facts set forth herein. I submit this Declaration in response to the April 21, 2022 request for audit made by Charles Dudek in connection with a campaign contribution made by Palm Place Investments, LLC ("Palm Place") to the Magsig for Congress Committee (FEC ID C00797639).

2. Palm Place is a California Limited Liability Company formed in 2010. The manager of Palm Place is Central Valley Development, LLC ("CVD"). I am the manager of CVD. I am familiar with Palm Place's tax status. I was authorized to sign and have signed the tax returns for Palm Place since its inception. Palm Place elected in its operating agreement to be treated by the Internal Revenue Service ("IRS") as a partnership pursuant to 26 CFR 301.7701-3. At the time Palm Place made its contribution to the Magsig for Congress Committee, Palm Place had elected to be treated by the IRS as a partnership.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 11th day of May, 2022 at Fresno, California.



Timothy Jones