



October 18, 2018

**VIA EMAIL**

"Rapid Response Team"  
Arkansas Judicial Campaign Conduct & Education Committee, Inc.  
P.O. Box 141475  
Little Rock, AR 72223

Dear Ms. Andreoli:

As counsel to the Republican State Leadership Committee, I respond to your letter of October 16.

This is the second time in recent months that your partisan-Democrat organization has attempted to bully and intimidate the RSLC. Let me be clear: Your organization is a sham, and no one should take it seriously.

First, despite masquerading as some quasi-legal entity, your organization has no legal authority whatsoever. Your implications to the contrary, such as your reference to the Arkansas Administrative Office of the Courts in your made-up "Rules and Procedure," are false and misleading.

Second, your organization can hardly claim to be impartial. Every single member of your "Rapid Response Team" has donated to Democrat candidates. We further note that you, Ms. Andreoli, follow two accounts on Twitter, one of which, "@NotAltWorld," bills itself as "the #Resistance team against #AltFacts." It is painfully clear that your organization is nothing more than a group of left-wing activists whose sole apparent purpose is to protect Democrats like Courtney Goodson from criticism that is protected under the First Amendment.

The claims in our ad are entirely accurate, and neither your organization nor Courtney Goodson have any legal basis whatsoever for demanding that we stop. Rather than cite what we actually say, you paraphrase our claims to capture "the essence of the Goodson complaint," objecting to what voters might conclude about her rather than what we actually say. Without any examination whatsoever of our claims, you then "find" our statements to be "false and misleading" on the sole basis that you previously have "found" other statements made by an unrelated, third-party organization as such.

Thank goodness you do not have any actual legal authority, because such kangaroo court antics would be a shocking violation of due process.

Nevertheless, we approach each of your "findings" regarding the "essence" of our claims in turn:

- (1) Gifts are given to Justice Goodson, and that she hears cases in which those donors appear as counsel, or as a party in the case, and in return for the donations or gifts, Justice Goodson rules in favor of the donor entities or persons.

Here is what the piece actually states:

First, that **“An ultra-wealthy Arkansas trial lawyer and campaign donor paid for Courtney Goodson and her husband to go on an extended luxury vacation to Italy, including a cruise on a yacht owned by one of her corporate campaign contributors.”** That is entirely accurate, and Goodson herself has admitted as much while claiming that the trip was nevertheless appropriate.

Second, the piece asks the following question, **“If Courtney Goodson gets lavish trips, what do the trial lawyers get from Courtney Goodson?”** That is a question, not a statement of fact, and a “reasonable person” (to use your terminology) might certainly ask the same thing.

Third, the piece states that **“On the Supreme Court, Goodson consistently sides with the trial lawyers, issuing legal opinions that make them millions more in their lawsuits.”** For this claim, the ad cites to a January 24, 2016 article in the *Arkansas Democrat-Gazette*, which states that Goodson “has written or joined opinions that cite the Arkansas Rules of Civil Procedure regarding class actions, which experts say are friendly to class action plaintiffs’ lawyers[.]” Lisa Hammersly, “Cash & the Court Part I: 6 law firms top donations list,” *Arkansas Democrat-Gazette* (Jan. 24, 2016). The statement that she “consistently sides with the trial lawyers” is fully supported by the article.

- (2) Justice Goodson asked for a pay raise.

Again, here is what the piece actually states: **“Goodson turned to Arkansas taxpayers to support her lavish lifestyle by asking for an additional \$18,000 pay raise...In 2017, Goodson requested another pay raise of \$18,000.”** This statement is entirely accurate.

Goodson has tried before to claim that she had nothing to do with her pay raises, because she did not personally request them before the Independent Citizens Commission (ICC). That characterization is false. As ICC’s minutes from May 15, 2017 show, Chief Justice Kemp requested the increase “On Behalf of the Justice and Judges of the Supreme Court.” The phrase “on behalf of” indicates agency and is commonly defined to mean “a representative of or a proxy for.” Goodson cannot possibly claim that she had nothing to do with the pay raises, when the request was made “on her behalf.”

Furthermore, this is entirely consistent with your own usage of the phrase in your letter to us, where you indicate that the complaint was “Filed by...Linda Napper on behalf of Justice Courtney Goodson Campaign.” We presume that Justice Goodson has some knowledge of this instant complaint, just as she was involved with Chief Justice Kemp’s request for a pay raise on her behalf.

Before closing, we note that Goodson’s campaign makes a shocking misstatement of law in her complaint, where she states that an Independent Expenditure Committee “legally...cannot ask people to vote for a candidate.” That is wildly false. An independent expenditure committee is organized to conduct independent expenditures, which by definition must “expressly advocate[] the election or defeat of a clearly identified candidate for office.” A.C.A. § 7-6-201(11)(A). The fact that Goodson’s campaign gets this basic statement of law so wrong is an embarrassment.

Any reasonable review of our ad would quickly conclude that our statements are entirely factual. Instead, your organization criticizes our ad, not for what it actually says, but for your paraphrasing of

"the essence" of what you think a voter might conclude. That is absurd, and you do it while falsely claiming to be a neutral arbiter when the facts show that your organization is anything but.

We stand by the ad and trust this resolves the matter.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Raymer", with a long horizontal flourish extending to the right.

Matthew S. Raymer  
Vice President & General Counsel  
Republican State Leadership Committee

# Arkansas Judicial Campaign Conduct & Education Committee

## "Rapid Response Team"

Danyelle Walker:

- Walker is currently registered as "Optional" in the state of Arkansas.

Name: Danyelle Jones Walker  
Address: [REDACTED]  
Party: Optional  
Precinct Code: 109  
Precinct Name: Precinct 109  
Polling Place: [REDACTED]

(Registrant Search Information, Arkansas Secretary of State [Website](#), Accessed 5/18/18; Updated 10/17/18)

- According to Nexis, Walker was registered to vote as a Democrat in 2016.

### 2: Arkansas Voter Registration

Name: JONES WALKER, DANYELLE  
Residential Address: [REDACTED]  
Home Phone: [REDACTED]  
SSN: [REDACTED]  
Date of Birth: [REDACTED]  
Gender: [REDACTED]

Registration Date: 10/2/1996  
Last Vote Date: 11/8/2016  
Party Affiliation: DEMOCRAT  
Active Status: ACTIVE

(Nexis Public Records, Accessed 10/17/18)

### Walker has contributed \$408 to Democrats on the federal level:

- In 2014, Walker contributed \$300 to Democrat candidate Mark Pryor.

WALKER, DANYELLE	MARK PRYOR FOR US	AR	DANYELLE WALKER LAW OFFICE,	05/31/2014	\$300.00
JONES	SENATE		PLLC		

([Danyelle Jones Walker](#), Individual Contributors, Federal Election Commission, Accessed 5/17/18)

- In 2008, Walker contributed \$108 to Obama for America.

WALKER, DANYELLE J    OBAMA FOR AMERICA    AR    LAW OFFICE OF DANYELLE WALKER, PLLC    10/18/2008    \$108.00

(Danyelle Jones Walker, Individual Contributors, Federal Election Commission, Accessed 5/17/18)

**Walker has contributed a total of \$550 on the state level, including a \$100 contribution for a candidate for Court of Appeals Associate Judge in District 7:**

- In April 2010, Walker contributed \$350 to Darrin L Williams for State Representative District 036.

Danyelle Jones Walker    \$350.00    Monetary    Darrin L Williams    [REDACTED]    State Representative District 036    2010    Primary    April Monthly    04-05-10    PDF

(Financial Disclosure Search, Arkansas Secretary of State Website, Accessed 10/17/18)

- In March 2008, Walker contributed \$100 to Waymond M Brown for Court of Appeals Associate Judge District 07.

danyelle walker    \$100.00    Monetary    Waymond M. Brown    [REDACTED]    Court of Appeals Associate Judge District 07    2008    General    March Monthly    03-24-08    PDF

(Financial Disclosure Search, Arkansas Secretary of State Website, Accessed 10/17/18)

- In March 2008, Walker contributes \$100 to Darrin L Williams for State Representative District 036.

Law Offices of Danyelle Walker    \$100.00    Monetary    Darrin L Williams    [REDACTED]    State Representative District 036    2008    Primary    March Monthly    03-10-08    PDF

(Financial Disclosure Search, Arkansas Secretary of State Website, Accessed 10/17/18)

**Walker is counsel of record for two cases that could reach the Arkansas Supreme Court, creating the appearance of a conflict of interest for her role on the RRT:**

1006070	DANYELLE WALKER Aliases: WALKER, DANYELLE J. WALKER, DANYELLE JONES, WALKER, DANYELLE JONES	Case: 19CV-18-186 SHARON IVY ETAL VS DAVID D NUGENT ETAL Status: OPEN	PLAINTIFF/PETITIONER ATTORNEY	28-FEB-18	2ND CIRCUIT DIVISION 1
1006070	DANYELLE WALKER Aliases: WALKER, DANYELLE J. WALKER, DANYELLE JONES, WALKER, DANYELLE JONES	Case: 52CV-17-201 CAROLYN SMITH v EMPLOYERS MUTUAL CASUALTY CO Status: OPEN	ATTORNEY	30-AUG-17	13TH CIRCUIT DIVISION 6

Elizabeth Andreoli:

- **Andreoli is registered as "Optional" in the state of Arkansas.**

Name: Elizabeth Ann Andreoli  
Address: [REDACTED]  
Party: Optional  
Precinct Code: 094  
Precinct Name: Precinct 094  
Polling Place: [REDACTED]

(Registrant Search Information, Arkansas Secretary of State [Website](#), Accessed 5/18/18)

- **According to Nexis, Andreoli was registered to vote as a Democrat in 2014.**

**1: Arkansas Voter Registration**

Name: ANDREOLI, ELIZABETH ANN  
Residential Address: [REDACTED]  
Date of Birth: [REDACTED]

Registration Date: 12/27/1988  
Last Vote Date: 11/4/2014  
Party Affiliation: DEMOCRAT  
Active Status: ACTIVE

(Nexis Public Records, Accessed 10/17/18)

**On the federal level, Andreoli has contributed \$141 to Democrats:**

- **So far this cycle, Andreoli has contributed a total of \$41 to ActBlue.**

Contributor name	Recipient	State	Employer	Receipt date	Amount
ANDREOLI, ELIZABETH	<u>ACTBLUE</u>	AR	ANDREOLI LAW	02/21/2017	\$15.00
ANDREOLI, ELIZABETH	<u>ACTBLUE</u>	AR	ANDREOLI LAW	02/18/2017	\$11.00
ANDREOLI, ELIZABETH	<u>ACTBLUE</u>	AR	ANDREOLI LAW	01/21/2017	\$15.00

([Elizabeth Andreoli](#), Individual Contributors, Federal Election Commission, Accessed 10/17/18)

- **In 2014, Andreoli contributed \$50 to Ready for Hillary PAC and \$100 to ActBlue.**

ANDREOLI, ELIZABETH	<u>READY FOR HILLARY PAC</u>	AR	ANDREOLI LAW, PLLC	07/08/2014	\$50.00
ANDREOLI, ELIZABETH	<u>ACTBLUE</u>	AR	ANDREOLI LAW, PLLC	01/10/2014	\$100.00

(Elizabeth Andreoli, Individual Contributors, Federal Election Commission, Accessed 5/17/18)

**Andreoli has contributed a total of \$100 on the state level to a candidate for the Court of Appeals Associate Judge District 3, Position 2:**

In April 2012, Andreoli contributed \$100 to "Niki" Thuy-Trang Thi Cung for the Court of Appeals Associate Judge District 3, Position 2.

Elizabeth Andreoli	\$100.00	Monetary	"Niki" Thuy-Trang Thi Cung	[REDACTED]	Court of Appeals Associate Judge District 03, Position 02	2012	General	April	04-05-Monthly	12	<a href="#">PDF</a>
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(Financial Disclosure [Search](#), Arkansas Secretary of State Website, Accessed 10/17/18)

Home Moments Notifications Messages Search Twitter

**Elizabeth Andreoli**  
@elizabe82660359  
Little Rock, AR  
Joined July 2013

Following 2 Followers 8

**NOT ALT WORLD**  
@NotAltWorld  
The #Resistance team against #AltFacts #FauxNews #FauxScience Formerly: Unofficial National Park Service #Science #Climate #Facts Run by non-gov...

**vicki vowell**  
@vickivowell  
CEO of Vowell, Inc., a multi-media company, publisher of About You (AY) Magazine and Arkansas Money & Politics (AMP).

Who to follow Refresh View all

[REDACTED] Follow

[REDACTED] Follow

Harold F. Bass, Jr.:

- **Bass Jr. is registered as "Optional" in the state of Arkansas.**

Name:	Harold Franklin Bass Junior
Address:	[REDACTED]
Party:	Optional
Precinct Code:	044
Precinct Name:	044
Polling Place:	[REDACTED]

(Registrant Search Information, Arkansas Secretary of State [Website](#), Accessed 10/17/18)

- **According to Nexis, Bass Jr. was registered to votes as a Democrat in 2016.**

**2: Arkansas Voter Registration**

Name:	BASS, HAROLD FRANKLIN JR
Residential Address:	[REDACTED]
SSN:	[REDACTED]
Date of Birth:	[REDACTED]
Gender:	[REDACTED]
Registration Date:	9/27/1976
Last Vote Date:	11/8/2016
Party Affiliation:	DEMOCRAT
Active Status:	ACTIVE

(Nexis Public Records, Accessed 10/17/18)

**On the federal level, Bass Jr. has contributed \$1,500 to Democrats:**

- **During the 2014 cycle, Bass Jr. contributed \$1,500 to Democrat James Lee Witt for Congress and \$500 to Democrat Mark Pryor.**

BASS, HAROLD F. JR	<u>JAMES LEE WITT FOR CONGRESS</u>	AR	OUACHITA BAPTIST UNIVERSITY	03/05/2014	\$1,000.00
BASS, HAROLD F. JR.	<u>JAMES LEE WITT FOR CONGRESS</u>	AR	OUACHITA BAPTIST UNIVERSITY	12/24/2013	\$500.00
BASS, HAROLD F JR	<u>MARK PRYOR FOR US SENATE</u>	AR	OBU	03/13/2013	\$500.00

([Harold F. Bass Jr.](#), Individual Contributors, Federal Election Commission, Accessed 5/17/18)

- **James Lee Witt was a Democratic candidate for Arkansas' 4<sup>th</sup> Congressional District.**



**WITT, JAMES LEE**  
 House candidate | Arkansas - 04 | Democratic Party

([James Lee Witt For Congress](#), Federal Election Commission, Accessed 5/17/18)

Hon. Audrey R, Evans:

- **Evans is registered as "Optional" in the state of Arkansas.**

**Name:** Audrey Riemer Evans  
**Address:** [REDACTED]  
**Party:** Optional  
**Precinct Code:** 109  
**Precinct Name:** Precinct 109  
**Polling Place:** [REDACTED]

(Registrant Search Information, Arkansas Secretary of State [Website](#), Accessed 5/18/18)

**On the federal level, Evans has contributed \$250 to Democrats:**

- **In 2000, Evans contributed \$250 to the Democrat National Committee.**

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EVANS, AUDREY	DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE	AR	ATTORNEY	07/20/2000	\$250.00
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([Audrey Evans](#), Individual Contributors, Federal Election Commission, Accessed 5/17/18)