



# U.S. House of Representatives COMMITTEE ON ETHICS

## Member / Officer Post-Travel Disclosure Form Original Amendment

This form is for disclosing the receipt of travel expenses from a private source for travel taken in connection with a Member or officer's official duties. This form does not eliminate the need to report privately-funded travel on the Member or officer's annual *Financial Disclosure Statement*. In accordance with House Rule 25, clause 5, **you must complete this form and file it with the Clerk of the House, B-81 Cannon House Office Building, within 15 days after travel is completed.** Please **do not** file this form with the Committee on Ethics.

**NOTE: Willful or knowing misrepresentations on this form may be subject to criminal prosecution pursuant to 18 U.S.C. § 1001.**

1. Name of Traveler: Ken Buck
2. a. Name of Accompanying Relative: \_\_\_\_\_ **OR** None   
 b. Relationship to Traveler:  Spouse  Child  Other (specify): \_\_\_\_\_
3. a. Dates: Departure: 2/21/19 Return: 2/23/19  
 b. Dates at Personal Expense, if any: \_\_\_\_\_ **OR** None
4. Departure City: Denver, CO Destination: Palm Beach, FL Return City: Denver, CO
5. Sponsor(s), Who Paid for the Trip: Club for Growth and Club for Growth Foundation
6. Describe Meetings and Events Attended (attach additional pages if necessary): The Congressman attended two dinners - one with keynote speakers, Sec. Betsy DeVos & Robert George, and the other with keynote speaker, Gov. Ron DeSantis. He was a panel speaker on Free Market Health Care Policy Solutions with Chip Roy (TX-21), Mark Green (TN-7) & Marc Short
7. Attached to this form are **each** of the following, *signify that each item is attached by checking the corresponding box*:
  - a.  a completed *Sponsor Post-Travel Disclosure Form*;
  - b.  the *Primary Trip Sponsor Form* completed by the trip sponsor **prior** to the trip, **including all** attachments **and** the *Grantmaking or Non-Grantmaking Sponsor Forms*;
  - c.  page 2 of the completed *Traveler Form* submitted by the Member or officer; **and**
  - d.  the letter from the Committee on Ethics approving my participation on this trip.
8. a. I represent that I participated in each of the activities reflected in the attached sponsor's agenda. **Signify statement is true by checking the box:**   
 b. If not, explain: \_\_\_\_\_

OFFICE OF THE CLERK  
U.S. HOUSE OF REPRESENTATIVES  
LEGISLATIVE RESOURCE CENTER  
2019 MAR -8 AM 10:42

**I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.** I have determined that all of the expenses on the attached *Sponsor Post-Travel Disclosure Form* were necessary and that the travel was in connection with my duties as a Member or officer of the U.S. House of Representatives and would not create the appearance that I am using public office for private gain.

Member / Officer Signature: Ken Buck

Date: 3/7/2019



U.S. House of Representatives

# COMMITTEE ON ETHICS

## Sponsor Post-Travel Disclosure Form

Original  Amendment

This form must be completed by an officer of any organization that served as the primary trip sponsor in providing travel expenses or reimbursement for travel expenses to House Members, officers, or employees under House Rule 25, clause 5. **A completed copy of the form must be provided to each House Member, officer, or employee who participated on the trip within ten days of their return.** You must answer all questions, and check all boxes, on this form for your submission to comply with House rules and the Committee's travel regulations. Failure to comply with this requirement may result in the denial of future requests to sponsor trips and/or subject the current traveler to disciplinary action or a requirement to repay the trip expenses.

**NOTE: Willful or knowing misrepresentations on this form may be subject to criminal prosecution pursuant to 18 U.S.C. § 1001.**

1. Sponsor(s) who paid for the trip: Club for Growth Foundation, Club for Growth; Answers are for both Club for Growth Foundation and Club for Growth

2. Travel Destination(s): Palm Beach, FL

3. Date of Departure: 2/21/2019 Date of Return: 2/23/2019

4. Name(s) of Traveler(s): Ken Buck

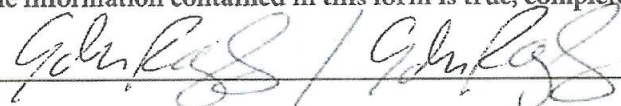
*Note:* You may list more than one traveler on a form only if *all* information is *identical* for each person listed.

5. Actual amount of expenses paid on behalf of, or reimbursed to, each individual named in Question 4:

	Total Transportation Expenses	Total Lodging Expenses	Total Meal Expenses	Total Other Expenses (dollar amount per item and description)
Traveler	\$984.96	\$1,186.50	\$633.12	\$0
Accompanying Family Member	N/A	N/A	N/A	N/A

6. All expenses connected to the trip were for actual costs incurred and not a *per diem* or lump sum payment. *Signify statement is true by checking box:*

I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature:  Date: 3/6/2019

Name: Adam Rozansky / Adam Rozansky Title: Treasurer / CFO

Organization: Club for Growth Foundation / Club for Growth

**I am an officer of the above-named organization. Signify statement is true by checking box:**

Address: 2001 L Street NW, Suite 600, Washington, DC 20036 / 2001 L Street NW, Suite 600, Washington, DC 20036

Telephone: 202-955-5500 / 202-955-5500 Email: ARozansky@clubforgrowth.org

*Committee staff may contact the above-named individual if additional information is required.*

If you have questions regarding your completion of this form, please contact the Committee on Ethics at 202-225-7103.



TRAVELER FORM

1. Name of Traveler: Kenneth Buck

2. Sponsor(s) who will be paying for the trip: Club for Growth Foundation and Club for Growth

3. Travel Destination(s): Palm Beach, FL

4. a. Date of Departure: 2/21/19 Date of Return: 2/23/19

b. Will you be extending the trip at your personal expense? [ ] Yes [x] No

If yes, list dates at personal expense:

5. a. Will you be accompanied by a family member at the sponsor's expense? [ ] Yes [x] No If yes:

(1) Name of Accompanying Family Member:

(2) Relationship to Traveler: [ ] Spouse [ ] Child [ ] Other (specify):

(3) Accompanying Family Member is at least 18 years of age: [ ] Yes [ ] No

6. a. Did the trip sponsor answer "Yes" to Question 8(c) on the Primary Trip Sponsor Form (i.e., travel is sponsored by an entity that employs a registered federal lobbyist or a foreign agent)? [ ] Yes [x] No

b. If yes, and you are requesting lodging for two nights, explain why the second night is warranted:

7. Primary Trip Sponsor Form is attached, including agenda, invitee list, and any other attachments and contributing sponsor forms: [x] Yes [ ] No

NOTE: The agenda should show the traveler's individual schedule, including departure and arrival times and identify the specific events in which the traveler will be participating.

8. Explain why participation in the trip is connected to the traveler's individual official or representational duties. Staff should include their job title and how the activities on the itinerary relate to their duties.

The Club for Growth Foundation Retreat fosters compelling discourse on policy issues relating to economic freedom and prosper... Congressman Buck can help educate Club for Growth because of his experience in Congress and his expertise on the changing nature of rural America.

9. Is the traveler aware of any registered federal lobbyists or foreign agents involved planning, organizing, requesting, or arranging the trip? [ ] Yes [x] No

10. For staff travelers, to be completed by your employing Member:

ADVANCED AUTHORIZATION OF EMPLOYEE TRAVEL

I hereby authorize the individual named above, an employee of the U.S. House of Representatives who works under my direct supervision, to accept expenses for the trip described in this request. I have determined that the above-described travel is in connection with my employee's official duties and that acceptance of these expenses will not create the appearance that the employee is using public office for private gain.

Signature of Employing Member Ken Buck Date 2/11/19



U.S. House of Representatives

# COMMITTEE ON ETHICS

## Primary Trip Sponsor Form

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers, or employees under House Rule 25, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer, or employee, who will then forward it to the Committee together with a *Traveler Form* **at least 30 days before the start date of the trip**. The trip sponsor should *NOT* submit the form directly to the Committee. The Committee website ([ethics.house.gov](http://ethics.house.gov)) provides detailed instructions for filling out the form.

**NOTE: Willful or knowing misrepresentations on this form may be subject to criminal prosecution pursuant to 18 U.S.C. § 1001. Failure to comply with the Committee's Travel Regulations may also lead to the denial of permission to sponsor future trips.**

1. Sponsor who will be paying for the trip: Club for Growth Foundation, Club for Growth; Answers are for both Club for Growth Foundation and Club for Growth
2. I represent that the trip will not be financed, in whole or in part, by a registered federal lobbyist or foreign agent. Signify that the statement is true by checking box:
3. **Check only one.** I represent that:
  - a. The primary trip sponsor has not accepted from any other source, funds intended directly or indirectly to finance any aspect of the trip:  **OR**
  - b. The trip is arranged without regard to congressional participation and the primary trip sponsor has accepted funds only from entities that will receive a tangible benefit in exchange for those funds:  **OR**
  - c. The primary trip sponsor has accepted funds from other source(s) intended directly or indirectly to finance all or part of this trip and has enclosed disclosure forms from each of those entities.   
If "c" is checked, list the names of the additional sponsors: \_\_\_\_\_
4. Provide names and titles of **ALL** House Members *and* employees you are inviting. **For each House invitee, provide an explanation of why the individual was invited** (include additional pages if necessary): See attached document: "House Ethics Addendums 2019"
5. Is travel being offered to an accompanying family member of the House invitee(s)?  Yes  No
6. Date of Departure: 2/21/2019 Date of Return: 2/23/2019
7. a. City of departure: Denver, CO  
b. Destination(s): Palm Beach, FL  
c. City of return: Denver, CO
8. **Check only one.** I represent that:
  - a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965:  **OR**
  - b. The sponsor of the trip does not retain or employ a registered federal lobbyist or foreign agent:  **OR**
  - c. The sponsor employs or retains a registered federal lobbyist or foreign agent, but the trip is for attendance at a one-day event *and* lobbyist / foreign agent involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations.
9. **Check only one of the following:**
  - a. I checked 8(a) or (b) above:
  - b. I checked 8(c) above but am not offering any lodging:
  - c. I checked 8(c) above and am offering lodging and meals for one night:  **OR**
  - d. I checked 8(c) above and am offering lodging and meals for two nights:  If you checked this box, explain why the second night of lodging is warranted: \_\_\_\_\_



U.S. House of Representatives

# COMMITTEE ON ETHICS

10. Attached is a detailed agenda of the activities House invitees will be participating in during the travel (i.e., an hourly description of planned activities for trip invitees). *Indicate agenda is attached by checking box:*
11. **Check only one of the following:**
- a. I represent that a registered federal lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip. *Signify that the statement is true by checking box:*  **OR**
- b. *Not Applicable.* Trip sponsor is a U.S. institution of higher education:
12. For *each* sponsor required to submit a sponsor form, describe the sponsor's interest in the subject matter of the trip *and* its role in organizing and/or conducting the trip:  
 See attached document: "House Ethics Addendums 2019"  
 \_\_\_\_\_  
 \_\_\_\_\_
13. **Answer parts a and b. Answer part c if necessary:**
- a. Mode of travel: Air  Rail  Bus  Car  Other  (specify: \_\_\_\_\_ )
- b. Class of travel: Coach  Business  First  Charter  Other  (specify: \_\_\_\_\_ )
- c. If travel will be first class, or by chartered or private aircraft, explain why such travel is warranted:  
 \_\_\_\_\_  
 \_\_\_\_\_
14. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). *Signify that the statement is true by checking box:*
15. **Check only one.** I represent that either:
- a. The trip involves an event that is arranged or organized *without regard* to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees:  **OR**
- b. The trip involves events that are arranged specifically *with regard* to congressional participation:
- If "b" is checked:
- 1) Detail the cost *per day* of meals (approximate cost may be provided): \_\_\_\_\_  
 \_\_\_\_\_
- 2) Provide the reason for selecting the location of the event or trip: \_\_\_\_\_  
 \_\_\_\_\_
16. Name, nightly cost, and reasons for selecting each hotel or other lodging facility:
- Hotel Name: The Breakers City: Palm Beach, FL Cost Per Night: \$593.25  
 Reason(s) for Selecting: See attached document: "House Ethics Addendums 2019"  
 Hotel Name: \_\_\_\_\_ City: \_\_\_\_\_ Cost Per Night: \_\_\_\_\_  
 Reason(s) for Selecting: \_\_\_\_\_  
 Hotel Name: \_\_\_\_\_ City: \_\_\_\_\_ Cost Per Night: \_\_\_\_\_  
 Reason(s) for Selecting: \_\_\_\_\_
17. I represent that all expenses connected to the trip will be for actual costs incurred and not a per diem or lump sum payment. *Signify that the statement is true by checking box:*



U.S. House of Representatives

# COMMITTEE ON ETHICS

18. Total Expenses for each Participant:

<input type="checkbox"/> Actual Amounts	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
<input checked="" type="checkbox"/> Good Faith Estimates			
For each Member, Officer, or Employee	\$849.50	\$1,186.50	\$815.88
For each Accompanying Family Member	N/A	N/A	N/A

	Other Expenses (dollar amount per item)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or Employee	N/A	N/A
For each Accompanying Family Member	N/A	N/A

**NOTE: Willful or knowing misrepresentations on this form may be subject to criminal prosecution pursuant to 18 U.S.C. § 1001.**

19. Check only one:

- a. I certify that I am an officer of the organization listed below:  OR
- b. Not Applicable. Trip sponsor is an individual or a U.S. institution of higher education.

20. I certify that I am not a registered federal lobbyist or foreign agent for any sponsor of this trip.

21. I certify by my signature that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature:  Date: 02/06/2019

Name: Adam Rozansky / Adam Rozansky

Title: Treasurer / Chief Financial Officer

Organization: Club for Growth Foundation / Club for Growth

Address: 2001 L Street NW, Suite 600 Washington, DC 20036 / 2001 L Street NW, Suite 600 Washington, DC 20036

Telephone: 202-955-5500 / 202-955-5500

Email: ARozansky@clubforgrowth.org / ARozansky@clubforgrowth.org

If there are any questions regarding this form, please contact the Committee at the following address:

### Committee on Ethics

U.S. House of Representatives

1015 Longworth House Office Building, Washington, D.C. 20515

Phone: 202-225-7103 General Fax: 202-225-7392



ONE HUNDRED SIXTEENTH CONGRESS

## U.S. House of Representatives

COMMITTEE ON ETHICS

February 18, 2019

The Honorable Ken Buck  
U.S. House of Representatives  
2455 Rayburn House Office Building  
Washington, DC 20515

Dear Colleague:

Pursuant to House Rule 25, clause 5(d)(2), the Committee on Ethics hereby approves your proposed trip to Palm Beach, Florida, scheduled for February 21 to 23, 2019, sponsored by Club for Growth and Club for Growth Foundation.

You must complete a Member/Officer Post-Travel Disclosure Form and file it, together with a Sponsor Post-Travel Disclosure Form completed by the trip sponsor, with the Clerk of the House within 15 days after your return from travel. As part of that filing, you are also required to attach a copy of this letter and both the Traveler and Primary Trip Sponsor Forms (including attachments) you previously submitted to the Committee in seeking pre-approval for this trip. You must also report all travel expenses totaling more than \$390 from a single source on the "Travel" schedule of your annual Financial Disclosure Statement covering this calendar year. Finally, Travel Regulation § 404(d) also requires you to keep a copy of all request forms and supporting information provided to the Committee for three subsequent Congresses from the date of travel.

If you have any further questions, please contact the Committee's Office of Advice and Education at extension 5-7103.

Sincerely,

Theodore E. Deutch  
Chairman

Kenny Marchant  
Ranking Member

TED/KM:adw

## General Agenda for Congressional attendees

Arrival Airport: Varies for each member

Arrival Date: Varies for each member

Arrival Time: Varies for each member

### Thursday, February 21<sup>st</sup>, 2019

- 5:30 PM – 6:30 PM Reception
- 6:30 PM – 9:00 PM Dinner with Keynote Address  
**Speaker:** Secretary Betsy DeVos  
**Moderator:** Rich Lowry  
**Topic:** Restoring Market Pressure in Education: Saving the Next Generation  
**Speaker:** Robert George  
**Topic:** Teaching the Next Generation the Values of Freedom  
Roundtable Policy Discussion with each Congressman

### Friday, February 22<sup>nd</sup>, 2019

- 7:30 AM – 9:00 AM Continental Breakfast
- 9:00 AM – 10:00 AM State of the Club  
**Speaker:** David McIntosh  
**Topic:** Overview of the Club's 2018 Legislative Activities
- 10:00 AM – 10:30 AM **Speaker:** Andy Puzder  
**Topic:** Why Millennials Should Embrace Capitalism and Reject Socialism
- 10:30 AM – 11:00 AM Break
- 11:00 AM – 11:45 AM **Speaker:** Reps. Chip Roy (TX-21), Ken Buck (CO-4), Mark Green (TN-7) & Marc Short  
**Moderator:** Byron York  
**Topic:** Free Market Health Care Policy Solutions
- 11:45 AM – 12:15 PM **Speaker:** Reps. Mark Meadows (NC-11), Jody Hice (GA-10) & Justin Amash (MI-3)  
**Moderator:** Scott Parkinson  
**Topic:** Freedom Alternatives to the House Majority Policy Agenda
- 12:15 PM – 12:30 PM Break
- 12:30 PM – 1:45 PM Lunch with Keynote Address  
**Speaker:** Governor Doug Burgum  
**Topic:** Advancing Free Market, Pro-Growth Policies at the State Level  
Roundtable Policy Discussion with each Congressman
- 1:45 PM – 3:45 PM Break



3:15 PM – 3:45 PM **Speaker:** Reps. Ralph Norman (SC-5) & Paul Gosar (AZ-4), & Van Taylor (TX-3)  
**Moderator:** Rich Lowry  
**Topic:** Shutdown, Chaos & the National Debt

3:45 PM – 6:00 PM Break

6:00 PM – 7:30 PM Reception

7:30 PM – 9:00 PM Dinner with Keynote  
**Speaker:** Gov. Ron DeSantis  
**Topic:** Advancing Conservatism in the Sunshine State  
Roundtable Policy Discussion with each Congressman

**Saturday, February 23<sup>rd</sup>, 2019**

7:30 AM – 9:00 AM Continental Breakfast

9:00 AM – 9:45 AM **Speaker:** Reps. Mark Meadows (NC-11), John Ratcliffe (TX-4) & Greg Steube (FL-17)  
**Moderator:** Matt Lewis  
**Topic:** The Role of Oversight in the New Congress

9:45 AM – 10:30 AM Break

10:30 AM – 11:15 AM **Speaker:** Salena Zito & Bryon Allen  
**Moderator:** Scott Parkinson  
**Topic:** *The Great Revolt: Inside the Populist Coalition Reshaping American Politics*

11:15 AM – 11:45 AM Break

11:45 AM – 12:30 PM **Speaker:** Reps. David Schweikert (AZ-6) & Ted Budd (NC-13)  
**Moderator:** Guy Benson, Fox News Contributor  
**Topic:** Silicon Valley vs. Wall Street: Pro-Growth Policies in the Tech Era

12:45 PM – 2:00 PM Lunch with Keynote Address  
**Speaker:** Cal Thomas  
**Topic:** Future of Free Market Policy in the U.S.A.

2:00 PM – 3:00 PM Break

3:00 PM – 3:30 PM General Session  
**Speaker:** Guy Benson, Deroy Murdock & Byron York  
**Moderator:** Matt Lewis  
**Topic:** Fake News, Deep Fakes & the Truth

3:30 PM – 6:00 PM Break

6:00 PM – 7:00 PM Reception

7:00 PM – 9:00 PM Dinner with Keynote Address  
**Speaker:** Bret Baier

**Topic:** State of Affairs of Government in Washington  
Roundtable Policy Discussion with each Congressman

9:00 PM – 11:00 PM

After Dinner Reception

**Sunday, February 24<sup>th</sup>, 2019**

Departure Airport: Varies for each member

Departure Date: Varies for each member

Departure Time: Varies for each member

## **PRIMARY TRIP SPONSOR FORM – HOUSE ETHICS ADDENDUMS 2019**

**4.** The following are House Member invitees for the event and explanations for each invitation.

The Club for Growth/Club for Growth Foundation has invited Members of Congress whom it believes are strong advocates of pro-growth policies, in order to educate the Club for Growth membership on economic policy issues from a pro-growth standpoint.

Listed Members are accepting travel expenses from the Club for Growth/Club for Growth Foundation. Other Members, not listed on the privately-sponsored travel forms, may be paying for travel-related expenses for the event personally or through campaign funds.

**Justin Amash** – To educate the Club for Growth membership on and have the benefit of their expertise on freedom alternatives to the House Majority policy agenda

**Ken Buck** – To educate the Club for Growth membership on and have the benefit of their expertise on free market health care policy solutions

**Ted Budd** – To educate the Club for Growth membership on and have the benefit of their expertise on Silicon Valley vs. Wall Street: Pro-growth policies in the tech era

**Paul Gosar** – To educate the Club for Growth membership on and have the benefit of their expertise on the shutdown, chaos & the National Debt

**Mark Green** – To educate the Club for Growth membership on and have the benefit of their expertise on free market health care policy solutions

**Jody Hice** – To educate the Club for Growth membership on and have the benefit of their expertise on freedom alternatives to the House Majority policy agenda

**Mark Meadows** – To educate the Club for Growth membership on and have the benefit of their expertise on freedom alternatives to the House Majority policy agenda and the role of oversight in the new Congress

**Ralph Norman** – To educate the Club for Growth membership on and have the benefit of their expertise on the shutdown, chaos & the National Debt

**John Ratcliffe** – To educate the Club for Growth membership on and have the benefit of their expertise on the role of oversight in the new Congress

**Chip Roy** – To educate the Club for Growth membership on and have the benefit of their expertise on free market health care policy solutions

**David Schweikert** – To educate the Club for Growth membership on and have the benefit of their expertise on Silicon Valley vs. Wall Street: Pro-growth policies in the tech era

**Greg Steube** – To educate the Club for Growth membership on and have the benefit of their expertise on the role of oversight in the new Congress

**5. & 18 (row 2).** The Club for Growth/Club for Growth Foundation offered to allow the spouses of all Members to attend the event with them. Several members accepted the Club for Growth/Club for Growth Foundation's offer. All spousal travel will be paid at their own expense and only the cost of the spouse's meals will be covered by the Club for Growth/Club for Growth Foundation.

**6. & 18 (column 2).** Actual dates and travel will vary for each member. Duration of stay may be shorter, which would result in a lower lodging cost. If a member chooses to stay an additional day, they will pay for the extra day's lodging and all other expenses incurred or related to that day with private funds. Club for Growth Foundation/Club for Growth will not pay any costs associated with the extra day.

**12. Club for Growth:** This trip is the annual Winter Economic Retreat and membership meeting of the Club for Growth. The purpose of the event is to create a forum for topical policy discussion for members of the Club for Growth.

**Club for Growth Foundation:** The Club for Growth Foundation is organizing and sponsoring a number of sessions. The Club for Growth Foundation's purpose as a sponsor of this event is to educate attendees about the value of free markets, pro-growth policies and creating economic prosperity.

**16.** The Club for Growth/Club for Growth Foundation chose The Breakers hotel for several reasons. The hotel has the conference spaces we require—for groups larger than 100 people—and the level of conference services we need to host that many people. We hire a conference broker to ensure we find the least expensive hotel that would accommodate our group. This contract was signed 3 years in advance to secure these comparatively low rates. The cost of the room at The Breakers is \$525 per evening. The rooms at this rate that we offer Members of Congress are the same rooms we block out for and rates we offer to our attendees, and is the least expensive rate that we are able to offer. This is significantly less than the non-contract room rates that start at \$870 per night that we negotiated down with the assistance of our conference broker. Room rates are nightly, subject to 13% tax, bringing the post-tax nightly rate up to \$593.25.

**18 (column 3).** Meals served at The Breakers are the same for Members of Congress as they are for conference attendees. The Club for Growth/Club for Growth Foundation works to order the least expensive meal options that The Breakers has available, and is working with the hotel staff to reduce the costs of meals as well. The hotel works their overhead for large banquets into the meal costs so actual price reflects costs to maintain their facilities, wait staff, cleaning staff, food preparation and kitchen maintenance. In addition, "extras" are not made available to Members, including alcohol, and therefore extras are not calculated into the meal estimates for the Members.