



VANCE DUNNAM  
 BOARD CERTIFIED-FAMILY LAW  
 VANCE DUNNAM, JR.  
 BOARD CERTIFIED-ESTATE PLANNING AND PROBATE LAW  
 BOARD CERTIFIED-RESIDENTIAL REAL ESTATE LAW  
 BOARD CERTIFIED-COMMERCIAL REAL ESTATE LAW  
 MERRILEE L. HARMON  
 BOARD CERTIFIED-FAMILY LAW  
 JIM DUNNAM  
 BOARD CERTIFIED-CIVIL TRIAL LAW  
 BOARD CERTIFIED-FAMILY LAW  
 Licensed in Texas and Colorado  
 GERALD R. VILLARRIAL  
 ANDREA MEHTA  
 ELEEZA JOHNSON  
 BRITTANY CLEERE  
 MASON VANCE DUNNAM

W.V. DUNNAM  
 (1891-1974)  
 W.V. DUNNAM, JR.  
 (1927-2006)

4125 WEST WACO DRIVE  
 WACO, TEXAS 76710

TELEPHONE (254)753-6437  
 FAX (254)753-7434

MAILING ADDRESS:  
 P O BOX 8418  
 WACO, TEXAS 76714-8418

WEBSITE: DUNNAMLAW.COM

September 24, 2021

Curley Trahan, Director of Pari-Mutuels  
 Texas Racing Commission  
 PO Box 12080  
 Austin, TX 78711-2080

Sent via email to [curley.trahan@txrc.texas.gov](mailto:curley.trahan@txrc.texas.gov)

Re: Proposed Allocation of Escrowed Purse Funds Paid Pursuant to Section 2028.202(c)(2), Occupations Code

Dear Mr. Trahan:

On behalf of the Texas Greyhound Association (TGA), I write in response to your September 9, 2021, letter to Lois Orta, Executive Director of TGA. For ease of reference, your letter is enclosed here.

As implied in your letter, escrowed purse funds from interstate cross-species simulcasting at horse racetracks in Texas continue to be held by TGA due to the fact that Valley Race Park did not run its scheduled meet for 2021. **There is no uncertainty any longer; it is a simple fact that no greyhound races will run live in Texas in the foreseeable future.** In light of current circumstances, TGA proposes for the Commission's approval the following allocation of escrowed purse funds from interstate cross-species simulcasting at horse racetracks in Texas.

Funds paid to TGA pursuant to Section 2028.202(c)(2), Occupations Code, from March 1, 2020, forward should be distributed in fair proportions to the 41 owners of Texas-bred greyhounds and the 8 kennel owners that were contracted to participate at the meets run at Gulf Greyhound Park for the January 2, 2020, through February 29, 2020, racing season. Such a distribution would benefit a large number of people at the core of Texas greyhound racing.

This proposed allocation is fully consistent with the relevant statutes and rules that govern the use of these escrowed purse funds. The law requires that these funds be distributed. Continued, open-ending escrow of the funds would violate the spirit and letter of the law. TGA requests that

ALL BOARD CERTIFICATIONS BY THE TEXAS BOARD OF LEGAL SPECIALIZATION

you share this proposed allocation with the Commission. TGA also requests that you share with the Commission the June 18, 2021, letter sent on behalf of TGA to Assistant Attorney General Zachary Rhines, which explains relevant legal requirements. Finally, TGA requests that TGA's legal counsel be allotted sufficient time at the Commission's upcoming meeting to discuss this proposed allocation and to answer any questions the Commission may have regarding the allocation.

Respectfully,



Jim Dunnam

Enclosures

(Ltr. from C. Trahan to L. Orta (Sept. 9, 2021))  
(Ltr. from J. Dunnam and K. Vickers to Z. Rhines (June 18, 2021))

CC: Connie Estes, Interim Executive Director ([connie.estes@txrc.texas.gov](mailto:connie.estes@txrc.texas.gov))  
Devon Bijansky, General Counsel ([devon.bijansky@txrc.texas.gov](mailto:devon.bijansky@txrc.texas.gov))  
Gerald Dube, Chief Financial Officer ([gerald.dube@txrc.texas.gov](mailto:gerald.dube@txrc.texas.gov))  
Zachary Rhines, Assistant Attorney General, Office of the Attorney General  
([Zachary.Rhines@oag.texas.gov](mailto:Zachary.Rhines@oag.texas.gov))  
Lois Orta, Executive Director, Texas Greyhound Association  
([loisorta@tgagreyhounds.com](mailto:loisorta@tgagreyhounds.com))