

TEXAS ETHICS COMMISSION

IN THE MATTER OF
MARIO GALLEGOS, JR.,
RESPONDENT

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BEFORE THE
TEXAS ETHICS COMMISSION
SC-2605155

ORDER and AGREED RESOLUTION

I. Recitals

The Texas Ethics Commission (the commission) met on June 28, 2007 to consider sworn complaint SC-2605155. A quorum of the commission was present. The commission determined that there is credible evidence of violations of sections 253.032, 253.035, 254.031, 254.061, and 254.0612, of the Election Code and section 20.61 of the Ethics Commission Rules, laws administered and enforced by the commission. To resolve and settle this complaint without further proceedings, the commission proposes this resolution to the respondent.

II. Allegations

The complaint alleges that the respondent:

- Failed to include required information about his campaign treasurer.
- Failed to include his digitized signature on multiple campaign finance reports.
- Failed to disclose the occupation or job title and employer of individuals from whom he accepted \$500 or more in political contributions during a reporting period.
- Improperly reported political expenditures as reimbursements.
- Insufficiently described the purpose of a number of political expenditures.
- Accepted a contribution from a corporation.
- Accepted contributions from a labor organization.
- Failed to timely file a semiannual campaign finance report.
- Accepted contributions from out-of-state committees without the required documentation.

- Knowingly accepted political contributions from a political committee that did not have a campaign treasurer in effect.
- Failed to properly report, and improperly reimbursed, political expenditures made from personal funds.
- Converted political contributions to personal use.

III. Facts Supported by Credible Evidence

Credible evidence available to the commission supports the following findings of fact:

1. The respondent is a state senator.
2. The complaint was filed on May 25, 2006.

Campaign Treasurer Information:

3. The complaint alleges that the respondent failed to include required information about his campaign treasurer on his July 2004, January 2005, and July 2005 semiannual reports, an 8-day pre-election report (filed on October 26, 2004), and a 30-day pre-election report (filed on October 1, 2004).
4. The reports in question do not include a telephone number for the respondent's campaign treasurer. In addition, the respondent's January 2005 semiannual report does not include the name and address of the respondent's campaign treasurer.

Digitized Signature:

5. The complaint alleges that the respondent failed to include his digitized signature on his July 2005 and January 2006 semiannual reports.
6. The reports were filed using the commission's electronic filing software and do not include a signature.

Omission of Occupation and Name of Employer:

7. The complaint alleges that the respondent failed to disclose on his January 2006 semiannual report the occupation or job title and employer of individuals from whom he accepted \$500 or more in political contributions during the reporting period.
8. The information was not complete on four entries.

9. The respondent indicated “best efforts” in the spaces for occupation/job title and employer for one contribution but did not include any additional documentation with his report.
10. The four contributions at issue in this allegation total \$7,000.

Staff Reimbursements:

11. The complaint alleges that the respondent improperly reported political expenditures as reimbursements on his July 2004, January 2005, July 2005, and January 2006 semiannual reports; and 30-day (filed on October 1, 2004) and 8-day (filed on October 26, 2004) pre-election reports.
12. The respondent disclosed “reimbursement,” “reimbursement & services,” “contract services & reimbursement,” and “services and reimbursement,” on the reports at issue.
13. The reimbursements at issue total approximately \$27,300.

Description of Expenditures:

14. The complaint alleges that the respondent insufficiently described the purpose of a number of political expenditures on his July 2004, January 2005, July 2005, and January 2006 semiannual reports; and 30-day (filed on October 1, 2004) and 8-day (filed October 26, 2004) pre-election reports.
15. The respondent listed “contract services” under the “purpose of payment” section of his campaign finance reports 61 times over multiple periods. The respondent also listed either “services and expenses,” “services and reimbursement,” or “services” under the purpose of payment section of his campaign finance report 13 times over multiple periods. The respondent also listed “election day expenses,” for one entry on his January 2005 semiannual report. All of the entries were expenditures to individuals.
16. The alleged expenditures at issue total approximately \$95,100.

Accepting a Corporate Contribution:

17. The complaint alleges that the respondent accepted an unlawful contribution from a corporation.
18. The respondent’s January 2005 semiannual report contained a contribution from Big City Capital LLC, accepted on December 3, 2004, in the amount of \$2,500.

19. According to Nevada Secretary of State records, Big City Capital LLC is a limited liability company. Under Nevada laws, corporations are organized and governed by a separate section of law from a limited liability company. See Nev. Rev. Stat., Title 7.

Accepting a Labor Organization Contribution:

20. The complaint alleges that the respondent accepted contributions from a labor organization disclosed on his January 2006 and July 2004 semiannual campaign finance reports.
21. The respondent disclosed one contribution from the American Federation of State, County & Municipal Employees – AFL/CIO on each report at issue.
22. The respondent swears that the contributions came from an out-of-state political committee and not a labor organization. Commission staff searched for but did not find the disclosure of the contribution at issue on reports on file with the Federal Election Commission.
23. The contributions at issue total approximately \$2,500.

Late Report:

24. The complaint alleges that the respondent failed to timely file his January 2006 semiannual report
25. The respondent filed his January 2006 semiannual report on February 2, 2006. The report was due on January 17, 2006.
26. The respondent filed an affidavit of timely filing on February 3, 2006, in which he swore that his software indicated the report was filed on January 17, 2006. However, on February 2, 2006, the respondent discovered that his software did not show the report was filed. With the assistance of commission staff, the respondent successfully filed the report on February 2, 2006.
27. Based on the respondent's affidavit of timely filing, commission records indicate that the report was timely filed.

Out-of State Committee:

28. The complaint alleges that the respondent accepted contributions from out-of-state committees without the required documentation on the respondent's July 2004 semiannual report and 30-day pre-election report (filed on October 1, 2004).
29. The reports at issue contained contributions from political committees located out-of-state.

30. The respondent's July 2004 report disclosed:
 - a. One contribution from CWA-Cope PCC for \$1,500.
 - b. Two contributions from IBEW-COPE totaling approximately \$3,500.
 - c. One contribution from United Food and Commercial Workers for \$2,000.
31. The respondent's 30-day pre-election report (filed on October 1, 2004) disclosed one contribution from Johnson & Johnson Employees Good Government Fund for \$500.
32. With the exception of the contribution from Johnson & Johnson Employees Good Government Fund each contribution exceeded \$500. The total amount of the contributions was approximately \$7,500.
33. In response to questions submitted by staff, the respondent replied that the contribution from CWA-COPE PCC was a check issued on behalf of CWA local Houston chapter and the contribution from United Food and Commercial Workers Active Ballot Club was a check issued on behalf of the local chapter. The respondent also stated that Johnson and Johnson Employees Good Government Fund is a multi-candidate committee, and that they received the required documents and reported the entry properly. The information was not included with the reports at issue.
34. In addition, the respondent swore that the two alleged labor organization contributions from the American Federation of State, County & Municipal Employees – AFL/CIO addressed previously in this order were actually from out-of-state political action committees. Those contributions were disclosed on the respondent's July 2004 and January 2006 semiannual reports. Each contribution exceeded \$500. The reports did not include information indicating that the committees were out-of-state political committees. The contributions totaled \$2,500.

Acceptance of Contributions from a Committee with no Campaign Treasurer:

35. The complaint alleges that the respondent knowingly accepted political contributions from a political committee whose campaign treasurer appointment was not filed with the commission. The allegation is based on the respondent's January 2005, January 2006, 8-day pre-election report (filed on October 26, 2004), and a 30-day pre-election report (filed on October 1, 2004).
36. The respondent had a campaign treasurer in effect with the commission when he accepted contributions in the alleged period.

Reimbursements:

37. The complaint alleges that the respondent failed to properly report, and improperly reimbursed, political expenditures made from personal funds beginning with the respondent's July 2003 semiannual report, and continuing through his January 2006 semiannual report.
38. The respondent reported 28 reimbursements, totaling approximately \$32,300, to himself on his campaign finance reports filed with the commission beginning July 2003 until January 2006. None of the respondent's reports prior to January 2006 include a Schedule G, showing political expenditures made from personal funds, or a Schedule E, which would show loans made from the candidate to the campaign. Nor do any of the respondent's campaign finance reports prior to January 2006 designate expenditures made from the respondent's personal funds.
39. The total amount of reimbursement to himself at issue was approximately \$32,300.

Donations and Flowers:

40. The complaint alleges that the respondent converted political contributions to personal use by using political contributions to make donations to private individuals, non-profit organizations, businesses, corporations and schools. The complaint also alleges that the respondent converted political contributions to personal use by purchasing flowers with political contributions. The allegations are in regard to expenditures reported between July 2003 and January 2006.
41. The respondent disclosed expenditures for various items, including (but not limited to) donations, sponsorships, fundraisers, tickets, scholarships, senior activities, door prizes, and flowers totaling approximately \$21,800.

IV. Findings and Conclusions of Law

The facts described in Section III support the following findings and conclusions of law:

Statute of Limitations (reporting violations):

1. The complaint alleges that the respondent made numerous reporting violations on his campaign finance reports filed beginning January 2002 through January 2006.
2. Ethics Commission rules prohibit the commission from considering an allegation barred from criminal prosecution by operation of the applicable statute of limitations. Ethics Commission Rules § 12.5. Failing to timely file or filing incomplete campaign finance reports is a Class C misdemeanor. The statute of limitations for misdemeanors is two years from the date of the commission of the offense. Code of Criminal Procedure, Art. 12.02.

Therefore, the commission does not have jurisdiction to consider allegations of reporting violations that occurred before May 25, 2004. Allegations relating to reports outside of the commission's jurisdiction were not addressed.

Campaign Treasurer Information:

3. A candidate's campaign finance reports must include the campaign treasurer's name, residence or business street address, and telephone number. ELEC. CODE § 254.061(c). The respondent's reports filed with commission failed to include the respondent's telephone number. In one instance, the respondent also failed to include the campaign treasurer's name, address, and telephone number. Therefore, there is credible evidence of violations of section 254.061(c) of the Election Code.

Digitized Signature:

4. Each report filed by electronic transfer must be under oath by the person required to file the report and must contain, in compliance with commission specifications, the digitized signature of the person required to file the report. ELEC. CODE § 254.036(h).
5. The respondent's July 2005 and January 2006 semiannual reports, which were filed electronically using the commission's software, did not include a digitized signature.
6. Commission records show that due to a defect in the electronic filing software in use during the time the reports at issue were filed, a digitized signature entered by the filer was not always transmitted to the commission. Accordingly, there is insufficient evidence of a violation of section 254.063(h) of the Election Code.

Omission of Occupation and Name of Employer:

7. Each report by a candidate for or holder of a legislative office must include, for each individual from whom the candidate has accepted political contributions that in the aggregate equal or exceed \$500 and that are accepted during the reporting period: (1) the individual's principal occupation or job title; and (2) the full name of the individual's employer. ELEC. CODE § 254.0612.
8. A filer is considered in compliance with section 254.0612 of the Election Code if the filer or the filer's campaign treasurer shows that the person has used best efforts to obtain, maintain and report the required information. ELEC. CODE § 254.0312.
9. The respondent failed to disclose the complete employer and occupation information on four entries. Although the respondent indicates "best efforts" in the space for occupation/job title and employer for one contribution, the respondent's response did not include documentation showing those "best efforts." The total amount of these incorrectly disclosed contributions is

approximately \$7,000. Therefore, there is credible evidence of violations of section 254.0612 of the Election Code.

Staff Reimbursements:

10. Each campaign finance report must include the amount of political expenditures that in the aggregate exceed \$50 and that are made during the reporting period, the full name and address of the persons to whom the expenditures are made, and the dates and purposes of the expenditures. ELEC. CODE § 254.031.
11. The report of a political expenditure for goods or services must describe the categories of goods or services received in exchange for the expenditure. Ethics Commission Rules § 20.61.
12. In Ethics Advisory Opinion No. 450 (2003), the commission determined that a political expenditure made to reimburse a staff member may be reported in one of two ways: (1) reporting it as a loan to the candidate from the staff member and then as an expenditure by the candidate to repay the staff member; or (2) if the expenditure and reimbursement occur during the same reporting period, report a single expenditure by listing the name of the individual or entity paid by the campaign worker as the payee, showing the date of the expenditure as the date the staff member made the expenditure, and explaining in the “purpose” section that a staff member made the expenditure from personal funds and that the candidate subsequently reimbursed the staff member.
13. The respondent did not use either of the two proper methods set out in Ethics Advisory Opinion No. 450 to report multiple reimbursements on his July 2004 semiannual report, 30-day pre-election report (filed on October 1, 2004), 8-day pre-election report (filed on October 26, 2004), and January 2005, July 2005, and January 2006 semiannual reports. The reimbursements totaled approximately \$27,300. Therefore, there is credible evidence of violations of section 254.031 of the Election Code and section 20.61 of the Ethics Commission Rules.

Description of Expenditures:

14. Each campaign finance report must include the amount of political expenditures that in the aggregate exceed \$50 and that are made during the reporting period, the full name and address of the persons to whom the expenditures are made and the dates and purposes of the expenditure. ELEC. CODE § 254.031(a)(3).
15. The report of a political expenditure for goods or services must describe the categories of goods or services received in exchange for the expenditure. Ethics Commission Rules § 20.61(a).
16. While the entries at issue broadly describe the purpose of the expenditures, they do not sufficiently describe the category of services received in exchange for the expenditure. The

amount of the entries in violation total approximately \$95,100. Therefore, there is credible evidence of violations of section 254.031(a)(3) of the Election Code and section 20.61(a) of the Ethics Commission Rules.

Accepting a Corporate Contribution:

17. Corporations organized under the Texas Business Corporations Act, the Texas Non-profit Corporations Act, federal law, or law of another state may not legally make political contributions to a candidate or officeholder. ELEC. CODE § 253.094.
18. A person may not knowingly accept an unlawful political contribution or make a political expenditure from an unlawful political contribution. ELEC. CODE § 253.003.
19. In Ethics Advisory Opinion No. 383 (1997), the commission determined that if a limited liability company is organized under a different statutory scheme than a corporation, the limited liability company is not subject to the restrictions under section 253.094 of the Election Code. Big City Capital LLC is a limited liability company with no corporate members. Therefore, it is not prohibited from making political contributions. Therefore, there is credible evidence that the respondent did not violate section 253.003 of the Election Code by accepting a political contribution from Big City Capital LLC.

Accepting a Labor Organization Contribution:

20. A labor organization may not legally make political contributions to a candidate or officeholder. ELEC. CODE § 253.094.
21. A person may not knowingly accept an unlawful political contribution or make a political expenditure from an unlawful political contribution. ELEC. CODE § 253.003.
22. The respondent swears that the contributions in fact came from an out-of-state political committee and not a labor organization. Commission staff did not locate the contribution at issue on Federal Election Commission reports; it is possible that the contributing committee failed to report the contribution or an affiliated political committee reported it. There is insufficient evidence of a violation of section 253.003 of the Election Code.

Late Report:

23. A candidate shall file two reports in each year. The first report shall be filed no later than July 15th. The second report shall be filed on later then January 15th. ELEC. CODE § 254.063.
24. The respondent's January 2006 semiannual report was filed after the deadline. The commission previously accepted an affidavit of timely filing from the respondent and no civil penalty was imposed. Therefore, there is credible evidence of no violation of sections 254.063 and 254.042 of the Election Code.

Out-of-State Committee:

25. In a reporting period, a candidate or officeholder may not knowingly accept political contributions totaling more than \$500 from an out-of-state political committee unless, before accepting a contribution that would cause the total to exceed \$500, the candidate, officeholder, or political committee, as applicable, receives from the out-of-state committee: (1) a written statement, certified by an officer of the out-of-state committee, listing the full name and address of each person who contributed more than \$100 to the out-of-state committee during the 12 months immediately preceding the date of the contribution; or (2) a copy of the out-of-state committee's statement of organization filed as required by law with the Federal Election Commission and certified by an officer of the out-of-state committee. ELEC. CODE § 253.032. A candidate or officeholder shall include the statement or copy as part of the report which covers the reporting period in which the contribution was made. *Id.* For reports filed electronically, the candidate or officeholder may enter a federal political committee's identification number on the campaign finance report instead of submitting the statement of organization.
26. CWA-COPE PCC is listed as a federal political action committee on the Federal Election Commission website. The commission does not have a campaign treasurer appointment on file for either United Food and Commercial Workers Active Ballot club or IBEW-COPE. Therefore, if the entities are political committees, they must either be a federal or out-of-state committee. The respondent disclosed contributions over \$500 from each of those committees on his July 2004 semiannual report. The total amount of contributions over \$500 from the out-of-state committees on the respondents report was approximately \$7,000. The respondent failed to attach either of the documents required by section 253.032 of the Election Code with his report, or include the Federal Election Commission identification number. The alleged labor organization entries that the respondent swore were actually out-of-state political committees also made political contributions of over \$500. The respondent failed to include the required information. Therefore, there is credible evidence of violations of section 253.032 of the Election Code.
27. A candidate or officeholder that accepts political contributions totaling \$500 or less from an out-of-state political committee shall include as part of the report filed under chapter 254 of the Election Code that covers the reporting period in which the contribution is accepted: (1) the same information for the out-of-state political committee required for general-purpose committees by sections 252.002 and 252.003 of the Election Code; or (2) a copy of the out-of-state committee's statement of organization filed as required by law with the Federal Election Commission and certified by an officer of the out-of-state committee. ELEC. CODE § 253.032(e).
28. The commission does not have a campaign treasurer appointment on file for Johnson and Johnson Employees Good Government Fund, but there is a similarly named federal political committee with the same address as the contributions at issue listed on the Federal Election

Commission website (Johnson & Johnson Political Action Committee). The respondent stated in his response to the questions from the commission that Johnson and Johnson Employees Good Government Fund is a multi-candidate committee, a term generally used to refer to a federal committee. The respondent disclosed a contribution of \$500 from the committee on his 30-day pre-election report (filed on October 1, 2004). The respondent failed to attach either of the documents required by section 253.032(e) of the Election Code with his report, or include the committee's Federal Election Commission identification number on the report. Therefore, there is credible evidence of a violation of section 253.032 of the Election Code.

Acceptance of Contributions from a Committee with No Campaign Treasurer:

29. A candidate may not knowingly accept a campaign contribution or make or authorize a campaign expenditure at a time when a campaign treasurer appointment for the candidate is not in effect. ELEC. CODE § 253.031(a).
30. According to commission records, the respondent had a campaign treasurer appointment on file at the time he accepted contributions during the alleged reporting periods. Section 253.031(a) of the Election Code does not apply to a candidate who accepts a political contribution from a political committee that does not have a campaign treasurer on file. Therefore, there is credible evidence of no violation of section 253.031(a) of the Election Code.

Statute of Limitations (personal use and improper reimbursement):

31. The complaint alleges that the respondent made numerous violations beginning January 2002 through January 2006.
32. Ethics Commission rules prohibit the commission from considering an allegation if the alleged violation is not also a criminal offense and if the allegation is based on facts that occurred more than three years before the date the complaint is filed. Ethics Commission Rules § 12.5(a). There is no criminal offense for a violation of section 253.035 of the Election Code, therefore the statute of limitation is 3 years. ELEC. CODE § 253.035. Allegations relating to violations outside of the commissions jurisdiction were not addressed.

Reimbursements:

33. A candidate who makes political expenditures from the candidate's personal funds may reimburse those personal funds from political contributions only if: (1) the expenditures from personal funds were fully reported as political expenditures, including the payees, dates, purposes, and amounts of the expenditures; and (2) the report clearly designates those expenditures as having been made from the person's personal funds and that the expenditures are subject to reimbursement. ELEC. CODE § 253.035(h).

34. In the alternative, a candidate who makes political expenditures from the candidate's personal funds may report the amount expended as a loan and may reimburse personal funds from political contributions in the amount of the reported loan. ELEC. CODE § 253.0351(a).
35. The total amount of reimbursements at issue is approximately \$32,300. The evidence indicates that the respondent did not previously disclose the political expenditures for which he made reimbursements as having been made from personal funds and subject to reimbursement. Therefore, there is credible evidence of violations of section 253.035(h) of the Election Code.

Donations and Flowers:

36. A person who accepts a political contribution as a candidate or officeholder may not convert the contribution to personal use. ELEC. CODE § 253.035(a).
37. "Personal use" means a use that primarily furthers individual or family purposes not connected with the performance of duties or activities as a candidate for or holder of a public office. ELEC. CODE § 253.035(d).
38. The evidence is insufficient that expenditures for donations, sponsorships, fundraisers, tickets, scholarships, senior activities, door prizes and flowers, made by the respondent furthered personal, rather than officeholder or candidate purposes. Therefore, there is insufficient evidence of violations of section 253.035(a) of the Election Code.

V. Representations and Agreement by Respondent

By signing this order and agreed resolution and returning it to the commission:

1. The respondent neither admits nor denies the facts described under Section III or the commission's findings and conclusions of law described under Section IV, and consents to the entry of this order and agreed resolution solely for the purpose of resolving this sworn complaint.
2. The respondent consents to this order and agreed resolution and waives any right to further proceedings in this matter. The respondent acknowledges that campaign finance reports must include the campaign treasurer's name, residence or business street address, and telephone number. The respondent acknowledges that each report by a candidate for or holder of a legislative office must include, for each individual from whom the candidate has accepted political contributions that in the aggregate equal or exceed \$500 and that are accepted during the reporting period: (1) the individual's principal occupation or job title; and (2) the full name of the individual's employer.
3. The respondent acknowledges that each campaign finance report must include the amount of political expenditures that in the aggregate exceed \$50 and that are made during the reporting period, the full name and address of the persons to whom the expenditures are made, and the

dates and purposes of the expenditures. The respondent acknowledges that during the period covered by the sworn complaint a political expenditure made to reimburse a staff member could be reported in one of two ways: (1) reporting it as a loan to the candidate from the staff member and then as an expenditure by the candidate to repay the staff member; or (2) if the expenditure and reimbursement occur during the same reporting period, report a single expenditure by listing the name of the individual or entity paid by the campaign worker as the payee, showing the date of the expenditure as the date the staff member made the expenditure, and explaining in the “purpose” section that a staff member made the expenditure from personal funds and that the candidate subsequently reimbursed the staff member. The respondent acknowledges that the report of a political expenditure for goods or services must describe the categories of goods or services received in exchange for the expenditure. The respondent acknowledges that the proper way to report reimbursements to staff is in accordance with section 20.62 of the Ethics Commission Rules.

4. The respondent acknowledges that in a reporting period, a candidate or officeholder may not knowingly accept political contributions totaling more than \$500 from an out-of-state political committee unless, before accepting a contribution that would cause the total to exceed \$500, the candidate, officeholder, or political committee, as applicable, receives from the out-of-state committee: (1) a written statement, certified by an officer of the out-of-state committee, listing the full name and address of each person who contributed more than \$100 to the out-of-state committee during the 12 months immediately preceding the date of the contribution; or (2) a copy of the out-of-state committee’s statement of organization filed as required by law with the Federal Election Commission and certified by an officer of the out-of-state committee. A candidate or officeholder shall include the statement or copy as part of the report which covers the reporting period in which the contribution was made. For reports filed electronically, the candidate or officeholder may enter a federal political committee’s identification number on the campaign finance report instead of submitting the statement of organization. The respondent acknowledges that a candidate or officeholder that accepts political contributions totaling \$500 or less from an out-of-state political committee shall include as part of the report filed under chapter 254 of the Election Code that covers the reporting period in which the contribution is accepted: (1) the same information for the out-of-state political committee required for general-purpose committees by sections 252.002 and 252.003 of the Election Code; or (2) a copy of the out-of-state committee’s statement of organization filed as required by law with the Federal Election Commission and certified by an officer of the out-of-state committee.
5. The respondent acknowledges that a candidate who makes political expenditures from the candidate’s personal funds may reimburse those personal funds from political contributions only if: (1) the expenditures from personal funds were fully reported as political expenditures, including the payees, dates, purposes, and amounts of the expenditures; and (2) the report clearly designates those expenditures as having been made from the person’s personal funds and that the expenditures are subject to reimbursement. In the alternative, a candidate who makes political expenditures from the candidate’s personal funds may report the amount expended as a loan and may reimburse personal funds from political contributions in the amount of the reported loan. The respondent agrees to comply with these requirements of the law.

VI. Confidentiality

This order and agreed resolution describes violations that the commission has determined are neither technical nor *de minimis*. Accordingly, this order and agreed resolution is not confidential under section 571.140 of the Government Code and may be disclosed by members and staff of the commission.

VII. Sanction

After considering the seriousness of the violations described under Sections III and IV, including the nature, circumstances, and consequences of the violations, and after considering the sanction necessary to deter future violations, the commission imposes an \$8,600 civil penalty.

VIII. Order

The commission hereby orders that if the respondent consents to the proposed resolution, this order and agreed resolution is a final and complete resolution of SC-2605155.

AGREED to by the respondent on this _____ day of _____, 20__.

Mario Gallegos Jr., Respondent

EXECUTED ORIGINAL received by the commission on: _____.

Texas Ethics Commission

By: _____
David A. Reisman, Executive Director