

TEXAS ETHICS COMMISSION

IN THE MATTER OF
R. CHRISTOPHER BELL,
RESPONDENT

§
§
§
§
§

BEFORE THE
TEXAS ETHICS COMMISSION
SC-2811384

ORDER and AGREED RESOLUTION

I. Recitals

The Texas Ethics Commission (the commission) met on April 16, 2009, to consider sworn complaint SC-2811384. A quorum of the commission was present. The commission determined that there is credible evidence of violations of sections 253.032, 254.031, and 254.0612 of the Election Code and section 20.29 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. Allegation

The complaint alleges that the respondent failed to properly disclose political contributions and political expenditures.

III. Facts Supported by Credible Evidence

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

1. The respondent was an unsuccessful candidate for state senator of District 17 in a special election held on November 4, 2008. The complaint alleges that the respondent improperly disclosed political contributions and political expenditures in two pre-election reports for the election.
2. The respondent's 30-day pre-election report disclosed the following:
 - \$9,715.04 in total political contributions of \$50 or less (corrected to \$9,835.04)
 - \$658,428.24 in total political contributions
 - \$1,249.72 in total political expenditures of \$50 or less
 - \$201,467.70 in total political expenditures (corrected to \$201,809.98)

- \$457,749.54 in total political contributions maintained as of the last day of the reporting period
 - \$0 in outstanding loans
3. The respondent's 8-day pre-election report disclosed the following:
- \$4,114 in total political contributions of \$50 or less
 - \$372,501.80 in total political contributions
 - \$954.85 in total political expenditures of \$50 or less
 - \$592,682.03 in total political expenditures (corrected to \$592,347.75)
 - \$124,721.28 in total political contributions maintained as of the last day of the reporting period
 - \$0 in outstanding loans
4. The respondent filed corrections to the reports at issue. In the correction affidavit for each correction, the respondent swears that he filed the corrected report not later than the 14th business day after the date he learned that the report as originally filed was inaccurate or incomplete and that any error or omission in the report as originally filed was made in good faith.

Cash Contributions

5. The complaint alleges that within a reporting period the respondent accepted from one person political contributions over \$100. The allegation is based on a political contribution of \$120 on July 20, 2008, that the respondent disclosed in his 30-day pre-election report. The name of the contributor was disclosed as "Cash, Unitemized" with the respondent's address.
6. In response to the allegation, the respondent swears:
- This contribution was the total amount of cash contributions collected during the campaign headquarters opening on July 20, 2008. There was no more than \$20.00 accepted from any one individual. It was a clerical error that these contributions were itemized on the report and these contributions have been un-itemized on a correction.
7. The respondent also corrected the 30-day pre-election report by removing the contribution from the Schedule A and adding the amount of \$120 to the total amount of political contributions of \$50 or less.

Out-of-State Political Committee Contributions

8. The complaint alleges that the respondent failed to include information in a campaign finance report regarding out-of-state political committees from which the respondent accepted

political contributions totaling more than \$500 in a reporting period. The following contributions were disclosed in the respondent's 30-day pre-election report:

- \$25,000 on September 25, 2008, from the Service Employees International Union (SEUI) COPE Fund in Washington, DC
 - \$1,000 on July 25, 2008, from the United Transportation Union PAC in Cleveland, Ohio
9. The 30-day pre-election report did not include the identification number that the Federal Election Commission (FEC) has assigned to each political committee or any additional information regarding the committees.
10. In response to the allegation, the respondent swears:
- The FEC ID numbers for both of these contributions were included on the data file used to import the contributions into the TEC reporting software. The report was validated by the TEC software before being submitted. The appropriate paper work is on file with the campaign and the original report has been amended to include these FEC ID numbers.
11. The respondent corrected the 30-day pre-election report on November 26, 2008, to include the FEC ID number for each committee.

Principal Occupation or Job Title and Name of Employer

12. The complaint alleges that the respondent failed to include in his reports the principal occupation or job title and the full name of the employer of political contributors. The complaint alleges that the respondent committed a violation regarding "24 places" in the 30-day pre-election report and regarding "35 places" in the 8-day pre-election report. The complaint did not identify the contributions for which the information is omitted.
13. In response to the allegations, the respondent corrected the principal occupation or job title and employer information for 10 political contributions totaling approximately \$1,600. All of the contributors were persons from whom the respondent accepted political contributions totaling \$500 or more in the respective reporting period.

Payees of Political Expenditures

14. The complaint alleges that the respondent failed to disclose the payees, dates, purposes, and amounts of political expenditures "when reimbursing expenses." The complaint includes lists of political expenditures totaling approximately \$57,630 that were disclosed in the respondent's pre-election reports. In response, the respondent swears:

All expense reimbursements made by the campaign were reported correctly by [identifying the] destination of the funds and the individual that was reimbursed for the expense. All expenditures that have been questioned will be addressed here individually.

15. The complaint includes a list of the following 14 political expenditures disclosed in the respondent's 30-day pre-election report with dates in calendar year 2008, which are individually followed by the respondent's specific response for each expenditure:

- \$16,400 to Peter Bell in Daly City, California, for "Photography Logo & Design" on August 20
 - The respondent swears that this expenditure was made directly to the payee for his services related to photography for the campaign, logo design, and general design of the website.
- \$5,000 to Charlotte-Anne Lucas & William G Waldrop in San Antonio for "Internet" on August 7
 - The respondent swears that this expenditure was for the payees' services in updating and maintaining the campaign website and that this was a monthly retainer.
- \$5,000 to Charlotte-Anne Lucas & William G Waldrop for "Website" on September 4
 - The respondent swears that this expenditure was a monthly retainer for the two payees as described by the respondent for the previous expenditure.
- \$300.46 to Charlotte-Anne Lucas & William G Waldrop for "Website" on September 4
 - The respondent swears that the expenditure was paid to the payees for costs related directly to domain registration for the campaign website.
- \$2,000 to Sarah Hudson in Austin for "Data Management" on August 21
 - The respondent swears that the payee was paid to manage the campaign's fundraising database and generate lists from that database for fundraising purposes and that this was a monthly payment to her for her services.

- \$253.21 to Nick Hellyar in Houston for “Health Care Reimbursement” on August 8
 - The respondent did not specifically address this expenditure.
 - \$253.21 to Nick Hellyar for “Health Care Reimbursement” on September 23
 - The respondent swears that this expenditure was made to the payee for his allowance for health care insurance provided by the campaign.
 - \$158.06 to Adrienne Fischer in Houston for “Mileage Reimbursement” on August 14
 - \$346.81 to Adrienne Fischer for “Mileage Reimbursement” on August 28
 - \$60.26 to John Gorczynski in Houston for “Mileage Reimbursement” on August 27
 - \$250.97 to John Gorczynski for “Mileage Reimbursement” on August 27
 - \$153.27 to John Gorczynski for “Mileage Reimbursement” on September 8
 - \$215.46 to Nick Hellyar for “Mileage Reimbursement” on September 8
 - \$192.23 to Nick Hellyar for “Mileage Reimbursement” on September 4
 - The respondent swears, for each of the mileage reimbursement expenditures, that the expenditures were made to the payees “for expenses incurred based on the IRS standard mileage rate for campaign trips.”
16. Regarding the expenditures to Nick Hellyar for “Health Care Reimbursement,” the respondent’s agent, who worked for the respondent’s campaign, states that Mr. Hellyar selected his own insurance plan and paid the premiums from his personal funds, that the respondent covered the cost of the insurance premiums up to a certain amount, and that the payments were considered part of Mr. Hellyar’s salary.
17. The complaint also includes a list of the following 14 political expenditures disclosed on the respondent’s 8-day pre-election report with dates in calendar year 2008, which are individually followed by the respondent’s specific response for each expenditure:
- \$7,435 to Peter Bell in Daly City, California for “Website Design Services” on October 9
 - The respondent swears that the expenditure was made to the payee for his help with the campaign’s website design.

- \$11,850 to Peter Bell for “Advertising Production” on October 24
 - The respondent swears that the expenditure was made to the payee for his services relating to general advertisement design for the campaign’s commercials, direct mail pieces, and e-mail.
- \$5,000 to Charlotte-Anne Lucas & William G Waldrop for “Website” on October 10
 - The respondent swears that the expenditure was made directly to the payees for their services in updating and maintaining the campaign website and that this was a monthly retainer.
- \$430 to Bruce Elfant in Austin for “Printing” on October 1
 - The respondent swears that the expenditure was made directly to the payee, who produced and printed a campaign push card.
- \$900 to Jeff Howison in Friendswood, Texas, for “Events” on September 29
 - The respondent swears that the expenditure was made to the payee for his services in coordinating a campaign rally for the campaign in Brazoria County.
- \$2,000 to Sarah Hudson for “Data Management” on September 30
 - The respondent swears that the campaign paid the payee to manage the campaign’s fundraising database and generate lists from that database for fundraising purposes and that this was a monthly payment to the payee for her services.
- \$347.49 to David Bonem in Bellaire, Texas, for “Mileage Reimbursement” on October 22
- \$702.01 to Adrienne Fischer for “Mileage Reimbursement” on September 26
- \$484.99 to Adrienne Fischer for “Mileage Reimbursement” on October 14
- \$64.35 to Christina Gorczynski in Houston for “Mileage Reimbursement” on October 13
- \$146.25 to Christina Gorczynski for “Mileage Reimbursement” on October 24
- \$361.54 to Scott Hamilton in Bellaire, Texas for “Mileage Reimbursement” on October 17
- \$220.84 to Nick Hellyar for “Mileage Reimbursement” on October 1

- The respondent swears, for each of the mileage reimbursement expenditures, that the expenditures were made to the payees “for expenses incurred based on the IRS standard mileage rate for campaign trips.”
- \$200 to Julie Zeinick in Little Rock, Arkansas, for “Mileage Reimbursement” on October 17
 - The respondent swears that this particular mileage reimbursement was made to the payee “for partial repayment of expenses incurred based on the IRS standard mileage rate for campaign trips.”

Disclosure of Political Contributions

18. The complaint alleges that the respondent failed to disclose \$48,753.77 in political contributions in his 8-day pre-election report.
19. In response to the allegation, the respondent swears that the amount of cash on hand disclosed in the 8-day pre-election report is accurate as originally reported and that the amount is “the balance of the campaign register after all contributions correctly accepted during the reporting period have been accounted for.”

Timely Disclosure of Political Expenditures

20. The complaint alleges that the respondent failed to timely disclose a political expenditure. The allegation is based on a political expenditure disclosed in the respondent’s 8-day pre-election report as \$150 to “SuperShuttle” in Denver, Colorado, on October 17, 2008. The respondent included a Schedule T for the expenditure, which states that the respondent traveled on August 26 and 28, 2008, from Houston to Denver, that the means of transportation was “Airport Shuttle,” and the purpose was “Democratic National Convention.”
21. In response to the complaint, the respondent corrected his pre-election reports by moving the expenditure from the 8-day pre-election report to the 30-day pre-election report and changing the date of the expenditure to August 29, 2008. The respondent also changed the amount of the expenditure from \$150 to \$158.
22. The respondent also swears:

The charges were made on an American Express card and were not presented to the campaign until after the 30th Day period report had been filed. The campaign filed the expenditures on the 8th day period report with the correct

dates of the out-of-state travel. We filed this in the most transparent way possible without correcting a previously filed report. We have subsequently filed corrections to accurately report the dates of the expenditures.

23. The respondent also disclosed a political expenditure of \$184.28 to “Morton’s” in Washington, DC, on October 17, 2008. The respondent included additional information on a Schedule T for the expenditure, stating that the respondent traveled on September 23 and 24, 2008, from Houston to Washington, that the means of transportation was “Restaurant,” and that the purpose of travel was “Campaign Meetings.” The respondent corrected the expenditure in response to the complaint by moving the expenditure from the 8-day pre-election report to the 30-day pre-election report and changing the date of the expenditure to September 15, 2008, and changing the dates of travel to September 14 and 16, 2008. The expenditure was not included in the complaint’s allegations.

IV. Findings and Conclusions of Law

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

Cash Contributions

1. A candidate, officeholder, or specific-purpose committee may not knowingly accept from a contributor in a reporting period political contributions in cash that in the aggregate exceed \$100. ELEC. CODE § 253.033(a).
2. A campaign finance report must include the amount of political contributions from each person that in the aggregate exceed \$50 and that are accepted during the reporting period by the person or committee required to file a report under this chapter, the full name and address of the person making the contributions, and the dates of the contributions. *Id.* § 254.031(a)(1).
3. A campaign finance report must also include the total amount or a specific listing of the political contributions of \$50 or less accepted and the total amount or a specific listing of the political expenditures of \$50 or less made during the reporting period. *Id.* § 254.031(a)(5).
4. The respondent disclosed a political contribution of \$120 from an unnamed source on his original 30-day pre-election report. The evidence indicates that the amount disclosed consisted of contributions from various individuals, none of which amounted to more than \$20. The amount at issue was moved to the unitemized contributions figure on the corrected report. There is no other evidence that the respondent accepted political contributions in cash totaling more than \$100 from a person in a reporting period. Therefore, there is credible evidence that the respondent did not violate section 253.033(a) of the Election Code.
5. There is no evidence that any of the contributors gave over \$50 to the respondent in the reporting period. Thus, the respondent was only required to include the contributions in the total amount of political contributions of \$50 or less in his report. He did not include the

contributions in the section on his report used to disclose the amount of contributions of \$50 or less in the reporting period. Instead, the contributions were itemized incorrectly because the actual names of the contributors were not disclosed and the respondent's mailing address was disclosed as the address for the contribution. Therefore, there is credible evidence that the respondent committed a technical or *de minimis* violation of section 254.031(a)(5) of the Election Code.

Out-of-State Political Committee Contributions

6. In a reporting period, a candidate 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 receives from the out-of-state committee 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 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).
7. A candidate shall include the statement or copy required by Subsection (a) as a part of the report filed under Chapter 254 that covers the reporting period to which Subsection (a) applies. *Id.* § 253.032(d).
8. A person who files a report with the commission by electronic transfer and who accepts political contributions from an out-of-state political committee required to file its statement of organization with the Federal Election Commission shall either enter the out-of-state committee's federal PAC identification number in the appropriate place on the report or timely file a certified copy of the out-of-state committee's statement of organization that is filed with the Federal Election Commission. Ethics Commission Rules § 20.29(a).
9. "Out-of-state political committee" means a political committee that makes political expenditures outside this state and in the 12 months immediately preceding the making of a political expenditure by the committee inside this state (other than an expenditure made in connection with a campaign for a federal office or made for a federal officeholder), makes 80 percent or more of the committee's total political expenditures in any combination of elections outside this state and federal offices not voted on in this state. ELEC. CODE § 251.001(15).
10. The evidence indicates that the respondent accepted a political contribution of more than \$500 from each of two out-of-state political committees during the period covered by his 30-day pre-election report. The report did not include either of the committees' statement of organization or FEC ID number. Therefore, there is credible evidence that the respondent violated section 253.032 of the Election Code and section 20.29(a) of the Ethics Commission Rules.

Principal Occupation or Job Title and Name of Employer

11. Each report by a candidate for a legislative office must include, for each individual from whom the person filing the report has accepted political contributions that in the aggregate equal or exceed \$500 and that are accepted during the reporting period the individual's principal occupation or job title and the full name of the individual's employer. ELEC. CODE § 254.0612.
12. The complaint alleges that the respondent failed to disclose the principal occupation or job title and employer in pre-election reports. The respondent filed corrections to his pre-election reports in response to the complaint to add the principal occupation or job title and employer information for political contributions from individuals from whom the respondent had accepted at least \$500 in the reporting period. The corrected contributions total approximately \$1,600. In each case, the respondent did not disclose the principal occupation, job title, or employer of the contributors. Therefore, there is credible evidence that the respondent violated section 254.0612 of the Election Code in connection with the contributions. Of the contributions, four contributions totaling approximately \$1,000 were from individuals whose principal occupation or job title and employer information were disclosed in the same report for other political contributions that equaled or exceeded \$500. Thus, the respondent disclosed the required information for some political contributions accepted by the contributors but failed to include the information for their remaining contributions disclosed in the same report. In those instances where the respondent disclosed the required information for some of the contributions accepted by the contributors, the violations are technical or *de minimis* (totaling approximately \$1,000 in contributions).

Payees of Political Expenditures

13. A 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(a)(3).
14. A political expenditure made out of personal funds by a staff member of an officeholder, a candidate, or a political committee with the intent to seek reimbursement from the officeholder, candidate, or political committee that in the aggregate do not exceed \$5,000 during the reporting period may be reported as follows if the reimbursement occurs during the same reporting period that the initial expenditure was made: (1) 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; and (2) included with the total amount or a specific listing of the political expenditures of \$50 or less made during the reporting period. Except as provided by subsection (a) of this section, a political expenditure made out of personal funds by a staff member of an officeholder, a candidate, or a political committee with the intent to seek reimbursement from the officeholder, candidate, or political committee must be reported as follows: (1) the aggregate amount of the expenditures made by the staff member as of the

- last day of the reporting period is reported as a loan to the officeholder, candidate, or political committee; (2) the expenditure made by the staff member is reported as a political expenditure by the officeholder, candidate, or political committee; and (3) the reimbursement to the staff member to repay the loan is reported as a political expenditure by the officeholder, candidate, or political committee. Ethics Commission Rules § 20.62.
15. The complaint alleges that the respondent did not disclose the actual payee information of approximately \$57,630 in political expenditures because they were reimbursements. The respondent swears that the destinations of the funds were identified and that the expenditures were reported correctly.
 16. According to the reports, approximately \$3,900 of the expenditures at issue were made as reimbursements for mileage. The respondent swears that the expenditures were for “expenses incurred based on the IRS standard mileage rate for campaign trips” and there is no evidence to dispute this statement. There is also no evidence that the respondent directed the individuals to purchase gasoline at a particular location. Thus, the respondent properly disclosed the payees of the expenditures that were mileage reimbursements. Therefore, there is credible evidence that the respondent did not violate section 254.031(a)(3) of the Election Code in connection with the expenditures that were mileage reimbursements.
 17. The respondent also disclosed approximately \$510 in expenditures to an individual for two equal payments for “Health Care Reimbursement.” The evidence indicates that the respondent was required to disclose the individual as the payee of the expenditures, not the insurance provider. Therefore, there is credible evidence that the respondent did not violate section 254.031(a)(3) of the Election Code in connection with the expenditures for health care reimbursements.
 18. The remaining amount of approximately \$53,220 in expenditures at issue were made to various individuals for such purposes as “Photography, Logo & Design;” “Internet;” “Website;” “Data Management;” “Website Design Services;” “Advertising Production;” “Printing;” and “Events.” The evidence indicates that the payees disclosed in the reports for the expenditures were the actual payees. Therefore, there is credible evidence that the respondent did not violate section 254.031(a)(3) of the Election Code in connection with the expenditures.

Disclosure of Political Contributions

19. A campaign finance report must include, as of the last day of a reporting period for which the person is required to file a report, the total amount of political contributions accepted, including interest or other income on those contributions, maintained in one or more accounts in which political contributions are deposited as of the last day of the reporting period. ELEC. CODE § 254.031(a)(8).
20. A campaign finance report must also include the amount of political contributions from each person that in the aggregate exceed \$50 and that are accepted during the reporting period by

the person or committee required to file a report under this chapter, the full name and address of the person making the contributions, and the dates of the contributions. *Id.* § 254.031(a)(1).

21. The complaint alleges that the respondent did not disclose \$48,753.77 in political contributions in his 8-day pre-election report because the amount of cash on hand disclosed in the report is greater than it should be, according to a calculation performed by the complainant. However, there is no evidence that this amount is actually incorrect. Furthermore, the respondent has sworn that the amounts of contributions and cash on hand are correct and there is no evidence to dispute that statement. Therefore, there is credible evidence that the respondent did not violate either of sections 254.031(a)(1) or (a)(8) of the Election Code.

Timely Disclosure of Political Expenditures

22. A 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(a)(3).
23. The description of a political expenditure for travel outside of the state of Texas must provide the name of the person or persons traveling on whose behalf the expenditure was made; the means of transportation; the name of the departure city or the name of each departure location; the name of the destination city or the name of each destination location; the dates on which the travel occurred; and the campaign or officeholder purpose of the travel, including the name of a conference, seminar, or other event. Ethics Commission Rules § 20.61(b).
24. For purposes of reporting under this chapter, a political expenditure is not considered to have been made until the amount is readily determinable by the person making the expenditure, except as provided by Subsection (b). ELEC. CODE § 254.035(a).
25. The amount of a political expenditure made by credit card is readily determinable by the person making the expenditure on the date the person receives the credit card statement that includes the expenditure. *Id.* § 254.035(c). Subsection (c) does not apply to a political expenditure made by credit card during the period covered by a pre-election report. *Id.* § 254.035(d).
26. The complaint alleges that the respondent failed to timely disclose a \$150 political expenditure for the respondent's transportation to or from an airport in Denver, Colorado. The evidence indicates that the amount of the expenditure was readily determinable during the time the travel occurred, which was on or about August 26, 2008. Thus, the respondent was required to disclose the expenditure in the 30-day pre-election report. The respondent corrected the date of the expenditure and corrected the amount of the expenditure to \$158.

Therefore, there is credible evidence that the respondent violated section 254.031(a)(3) of the Election Code in connection with the expenditure.

27. The respondent also corrected a political expenditure of \$184.28 by changing its date and moving it from the 8-day pre-election report to the 30-day pre-election report. Therefore, there is credible evidence that the respondent violated section 254.031(a)(3) of the Election Code in connection with the expenditure.

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.
3. The respondent acknowledges that a campaign finance report must include the total amount or a specific listing of the political contributions of \$50 or less accepted and the total amount or a specific listing of the political expenditures of \$50 or less made during the reporting period; that a 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; and that each campaign finance report by a candidate for a legislative office must include, for each individual from whom the person filing the report has accepted political contributions that in the aggregate equal or exceed \$500 and that are accepted during the reporting period the individual's principal occupation or job title and the full name of the individual's employer. The respondent also acknowledges that a candidate who accepts political contributions from an out-of-state political committee shall include the statement or copy required by section 253.032(a) of the Election Code as a part of the campaign finance report covering the period in which the political contributions are accepted and that a person who files a report with the commission by electronic transfer and who accepts political contributions from an out-of-state political committee required to file its statement of organization with the Federal Election Commission shall either enter the out-of-state committee's federal PAC identification number in the appropriate place on the report or timely file a certified copy of the out-of-state committee's statement of organization that is filed with the Federal Election Commission. 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 a \$400 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-2811384.

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

R. Christopher Bell, Respondent

EXECUTED ORIGINAL received by the commission on: _____.

Texas Ethics Commission

By: _____
David A. Reisman, Executive Director