

# TEXAS ETHICS COMMISSION

**IN THE MATTER OF**  
**THERESA DANIEL,**  
**RESPONDENT**

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**BEFORE THE**  
**TEXAS ETHICS COMMISSION**  
**SC-31410233**

## **ORDER and AGREED RESOLUTION**

### **I. Recitals**

The Texas Ethics Commission (Commission) met on February 15, 2017, to consider sworn complaint SC-31410233. A quorum of the Commission was present. The Commission determined that there is credible evidence of violations of sections 254.031 and 254.064 of the Election Code and sections 20.59 and 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 proposed this resolution to the respondent.

### **II. Allegations**

The complaint alleged that the respondent: 1) did not properly disclose on multiple campaign finance reports political contributions and political expenditures; 2) did not timely file a pre-election campaign finance report; 3) accepted political contributions from corporations or labor organizations; 4) accepted political contributions in cash from a contributor that exceeded \$100; and 5) 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 was elected as Dallas County Commissioner for District 1 in the November 6, 2012, general election. The five reports at issue in the complaint are the respondent's 8-day pre-election report for the November 6, 2012, general election, January and July 2013 semiannual reports, and January and July 2014 semiannual reports.

## Disclosure of Political Contributions

### Contributor Names

2. The complaint alleged that the respondent did not disclose the full names of three political contributors. The contributions at issue were disclosed on the respondent's 8-day pre-election report for the November 2012 general election as follows:
  - October 9, 2012, \$1,500 from METROTEX (not corrected)
  - October 16, 2012, \$100 from Anonymous (contribution donated to charity)
  - October 24, 2012, \$1,000 from TX UAW CAP (not corrected)
3. In response to the complaint, the respondent swore that the contributions from METROTEX and TX UAW CAP were properly reported. Credible evidence indicates that the contribution from METROTEX was from the MetroTex Association of REALTORS Political Action Committee, a general-purpose committee that files with the Commission, and that the committee also uses the acronym MetroTex-PAC to identify itself. Credible evidence indicates that the contribution from TX UAW CAP was from the Texas United Automobile Workers CAP Volunteer Fund Committee, a general-purpose committee that files with the Commission, and that the committee uses the acronym TUCVFC to identify itself.
4. Regarding the contribution from "Anonymous," the respondent swore that the contribution was mistakenly accepted and was contributed to charity and reflected as an expenditure in her January 2015 semiannual report. The respondent also stated that the contribution was from a single contributor.

### Contributor Addresses

5. The complaint alleged that the respondent did not disclose the full addresses of two political contributors. One of the contributions was the \$100 contribution from "Anonymous," discussed above, and the respondent did not disclose an address. The other contribution at issue was for \$500 and disclosed in the respondent's July 2013 semiannual report as being accepted from the "Apartment Assoc. of Greater Dallas" on March 17, 2013. The respondent did not disclose any address information for that contribution in the original report.

## Disclosure of Political Expenditures

### Payee Names

6. The complaint alleged that the respondent did not disclose the full names of payees of political expenditures. The expenditures at issue, along with the respondent's corrections, were disclosed as follows:
- October 15, 2012, \$2,500 to DCDP Coordinated Campaign (corrected to Dallas County Democratic Party)
  - October 25, 2012, \$4,602.22 (no payee name disclosed; corrected payee name to The Order Desk)
  - March 11, 2013, \$750 to DCDP (corrected to Dallas County Democratic Party)
  - March 14, 2013, \$500 to NYLO (not corrected)
  - April 1, 2013, \$3,396.01 to NYLO (not corrected)
  - April 12, 2013, \$1,350 to TBAAL (not corrected)
  - April 24, 2013, \$1,000 to J Price (corrected to indicate a direct expenditure to John W Price)
  - October 3, 2013, \$750 to DCDP (corrected to Dallas County Democratic Party)
  - March 25, 2014, \$750 to DCDP (corrected to Dallas County Democratic Party)
  - May 21, 2014, \$500 to DCDP (corrected to Dallas County Democratic Party)

### Payee Addresses

7. The complaint alleged that the respondent did not disclose the address of two payees of political expenditures in the July 2013 semiannual report. One of the expenditures at issue was for \$250 to the Lake Highland Jr. Women's League on February 10, 2013; the other expenditure was for \$1,000 to an individual on April 24, 2013. The respondent did not disclose any address information in the original report at issue. In response to the complaint, the respondent corrected the report to provide complete address information for the two payees at issue.

## Actual Payee for Credit Card Expenditures

8. The complaint alleged that the respondent did not properly disclose political expenditures made by credit card by not identifying the actual vendor who received payment from the credit card company. The expenditures at issue were disclosed in the respondent's July 2013 and January and July 2014 semiannual reports as follows:
- March 18, 2013, \$500 to Chase Card Service for "Mailing"

- April 20, 2013, \$2,500 to Chase Card Service for "Mailing"
- May 18, 2013, \$1,000 to Chase Card Service for "Mailing"
- June 16, 2013, \$500 to Chase Card Service for "Mailing"
- July 13, 2012, \$5,974.37 to Chase Card Service for "Event" (date was corrected to July 13, 2013)
- April 11, 2014, \$125 to Chase Card Service (no purpose disclosed)

### **Purpose of Political Expenditures**

9. The complaint alleged that the respondent did not properly disclose the purpose of numerous political expenditures that were disclosed in the five campaign finance reports at issue. The respondent disclosed a category but no description for all of the expenditures at issue. The respondent disclosed in the 8-day pre-election report seven political expenditures totaling approximately \$20,180 with no descriptions; the respondent disclosed in the January 2013 semiannual report nine political expenditures totaling approximately \$29,315 with no descriptions; the respondent disclosed in the July 2013 semiannual report 25 political expenditures totaling approximately \$18,505 with no descriptions; the respondent disclosed in the January 2014 semiannual report 11 political expenditures totaling approximately \$10,160 with no descriptions; and the respondent disclosed in the July 2014 semiannual report nine political expenditures totaling approximately \$8,040 with no descriptions. In response to the complaint, the respondent corrected the reports at issue to provide descriptions for the expenditures.

### **Staff Reimbursements**

10. The complaint alleged that the respondent did not disclose the actual vendor for two political expenditures totaling \$290 that appear to have been made as staff reimbursements. The expenditures at issue were disclosed in the respondent's January 2014 semiannual report as being made to two individuals. In response to the complaint, the respondent stated that the actual payees were disclosed because the expenditures were made directly to the individuals for campaign services rendered.

### **Total Political Contributions of \$50 or Less and Total Political Expenditures of \$100 or Less**

11. The complaint alleged that on the cover sheet of the January 2013 semiannual report the respondent did not disclose total political contributions of \$50 or less and total political expenditures of \$100 or less. The respondent left the spaces for these amounts blank on the report at issue.

**Total Political Contributions Maintained**

12. The complaint alleged that the respondent did not disclose total political contributions maintained on the January and July 2013 semiannual reports and the January and July 2014 semiannual reports. The respondent left the spaces blank for total political contributions maintained in the January and July 2013 semiannual reports and the January 2014 semiannual report.
13. In response to the complaint, the respondent corrected the reports at issue and provided copies of her campaign account bank statements. The amounts disclosed in the original reports, along with the corrected amounts and amounts disclosed in the bank statements, are as follows:
  - January 2013 semiannual report – not disclosed in original report; corrected to \$7,742.63; bank statement shows \$7,742.63
  - July 2013 semiannual report – not disclosed in original report; corrected to \$7,517.96; bank statement shows \$7,517.96
  - January 2014 semiannual report – not disclosed in original report; corrected to \$10,938.02; bank statement shows \$10,938.02
  - July 2014 semiannual report – original report disclosed \$6,162.65; corrected to \$10,028.64; bank statement shows \$10,028.64

**Timely Filing of Pre-election Report**

14. The complaint alleged that the respondent did not timely file the 8-day pre-election report for the November 6, 2012, general election, in which the respondent was an opposed candidate for Dallas County Commissioner, District 1. Records on file with the Dallas County Elections office indicate that the respondent filed the report on the morning of October 30, 2012. The report disclosed the following relevant totals:
  - \$9,445 in total political contributions
  - \$20,279.41 in total political expenditures
  - \$10,679 in total political contributions maintained
  - \$25,000 in total outstanding loans
15. The 8-day pre-election report for the November 6, 2012, general election was required to be filed by October 29, 2012. The respondent filed the report one day late on October 30, 2012.

In response to the complaint, the respondent stated that the report was late due to a "mix-up" in her office.

### **Accepting Political Contributions from Corporations**

16. The complaint alleged that the respondent accepted three political contributions totaling \$2,000 from two corporations. The contributions at issue were disclosed on Schedule A (used to disclose political contributions) of the respondent's 8-day pre-election report and July 2013 and January 2014 semiannual reports as follows:
- October 23, 2012, \$1,000 from Muslim Dem Caucus of TX
  - March 17, 2013, \$500 from Apartment Assoc. of Greater Dallas
  - July 11, 2013, \$500 from UA Plumbers & Pipefitters
17. In response to the complaint, the respondent swore that each contribution at issue was from a political committee. Commission records indicate that the political contributions at issue were made by the Muslim Democratic Caucus Political Action Committee, the Apartment Association of Greater Dallas Political Action Committee, and the UA Plumbers & Pipefitters Local 100 PAC Fund, all of which are political committees. Each political committee disclosed in campaign finance reports making a political expenditure to the respondent in the same amount and around the same period of time as what was disclosed in the respondent's reports.

### **Cash Contributions Exceeding \$100**

18. The complaint alleged that the respondent accepted cash contributions exceeding \$100 from a contributor. The allegation was based on Schedule A of the respondent's January 2014 semiannual report, where the respondent disclosed receiving \$150 on July 11, 2013, from "Cash."
19. In response to the complaint, the respondent swore that the contribution was mistakenly accepted and was donated to charity and reflected as an expenditure in the January 2015 semiannual report. The respondent also stated that the contribution was from three contributors but she did not know the exact amount that each person contributed.

### **Conversion to Personal Use**

20. The complaint alleged that the respondent converted political contributions to personal use based on a political expenditure that was disclosed in the respondent's July 2013 semiannual report as follows:

- June 16, 2013, \$250 to Cash, under the category of "Event Incidentals" (no description provided)
21. In response to the complaint, the respondent acknowledged that she did not properly disclose the payee and corrected the report to disclose the payee as "Jack Boles Parking" with a category of the expenditure as "Fee" and a description of "Event Parking Provided by Valet Company for Pol Fundraiser." The respondent stated that the expenditure was for valet parking in connection with a birthday fundraiser campaign event.

#### **IV. Findings and Conclusions of Law**

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

##### **Disclosure of Political Contributions**

1. Each 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. ELEC. CODE § 254.031(a)(1).
2. A determination to accept or refuse a political contribution that is received by a candidate, officeholder, or political committee shall be made not later than the end of the reporting period during which the contribution is received. *Id.* § 254.034(a).
3. If the determination to accept or refuse a political contribution is not made before the time required by Subsection (a) for purposes of this chapter, the contribution is considered to have been accepted on the last day of that reporting period. *Id.* § 254.034(b).
4. A political contribution that is received but not accepted shall be returned to the contributor not later than the 30th day after the deadline for filing a report for the reporting period during which the contribution is received. A contribution not returned within that time is considered to be accepted. *Id.* § 254.034(c).

##### Contributor Names

5. The respondent was required to disclose the full names of the three contributors at issue because each contribution exceeded \$50 in the aggregate. Regarding the two contributions totaling \$2,500 disclosed from METROTEX and TX UAW CAP, the respondent did not list the full names and/or acronyms used by the committees. However, the names as disclosed by the respondent did not substantially affect disclosure. Therefore, there is credible evidence

of technical or *de minimis* violations of section 254.031(a)(1) of the Election Code regarding those two contributors.

6. Regarding the \$100 contribution from "Anonymous," credible evidence indicates that the contribution was from a single contributor. The respondent disclosed accepting the political contribution on October 16, 2012, and did not return the contribution until December 31, 2014. Thus, the contribution was deemed accepted by the respondent because it was returned more than 30 days after the filing deadline for the report for the reporting period during which the contribution was received. The respondent was required to itemize the contribution and provide the full name and address of the contributor because the contribution exceeded \$50. The respondent did not provide the name of the contributor. Therefore, there is credible evidence of a violation of section 254.031(a)(1) of the Election Code regarding that contribution.

#### Contributor Addresses

7. Regarding the \$100 contribution from "Anonymous," discussed above, there is credible evidence of a violation of section 254.031(a)(1) of the Election Code because the respondent did not provide the contributor's address. The other contribution at issue was for \$500 and disclosed in the respondent's July 2013 semiannual report as being accepted from the "Apartment Assoc. of Greater Dallas" on March 17, 2013. The respondent did not disclose any address information for the contribution. Therefore, there is credible evidence of a violation of section 254.031(a)(1) of the Election Code.

#### **Disclosure of Political Expenditures**

8. A campaign finance report must include, for all political expenditures that in the aggregate exceed \$100 and that are made during the reporting period, the full name and address of the persons to whom political expenditures are made and the dates and purposes of the expenditures. ELEC. CODE § 254.031(a)(3).

#### Payee Names

9. The respondent was required to provide the full name of each payee at issue because each expenditure exceeded \$100. Regarding the expenditures to DCDP, the acronym used by the respondent is a commonly recognized acronym by which the Dallas County Democratic Party is identified. Regarding the expenditures to NYLO, an Internet search using the acronym returned an exact match for the payee at issue. Although the full name of the payee appears to be NYLO Hotels, the respondent provided the correct address information for the payee and the disclosure substantially complies. Regarding the contribution to TBAAL, the acronym used by the respondent is a commonly recognized acronym for The Black Academy

of Arts and Letters. Therefore, there is credible evidence of no violations of section 254.031(a)(3) of the Election Code regarding those eight expenditures.

10. Regarding the remaining expenditure of \$4,602.22 where no payee name was disclosed, and the other \$1,000 expenditure to J Price, the respondent did not disclose the full names of the payees. Therefore, there is credible evidence of violations of section 254.031(a)(3) of the Election Code regarding those two expenditures.

#### Payee Addresses

11. The respondent was required to provide an address for each of the two payees at issue because each expenditure exceeded \$100. The respondent did not disclose any address information in the original report. Therefore, there is credible evidence of violations of section 254.031(a)(3) of the Election Code.

#### **Actual Payee for Credit Card Expenditures**

12. A campaign finance report must include the amount of political expenditures that in the aggregate exceed \$100 and that are made during the reporting period, the full name and address of the persons to whom political expenditures are made, and the dates and purposes of the expenditures. ELEC. CODE § 254.031(a)(3).
13. At the time at issue, Ethics Commission Rules section 20.59 stated: A report of a political expenditure by credit card must identify the vendor who receives payment from the credit card company.
14. The respondent did not identify the vendors who received payment from the credit card companies in the original reports. Therefore, there is credible evidence of violations of section 254.031(a)(3) of the Election Code and section 20.59 of the Ethics Commission Rules.

#### **Purpose of Political Expenditures**

15. A campaign finance report must include, for all political expenditures that in the aggregate exceed \$100 and that are made during the reporting period, the full name and address of the persons to whom political expenditures are made and the dates and purposes of the expenditures. ELEC. CODE § 254.031(a)(3).
16. The purpose of an expenditure means a description of goods, services, or other thing of value and must include a brief statement or description of the candidate, officeholder, or political committee activity that is conducted by making the expenditure. The brief statement or

description must include the item or service purchased and must be sufficiently specific, when considered within the context of the description of the category, to make the reason for the expenditure clear. Merely disclosing the category of goods, services, or other thing of value for which the expenditure is made does not adequately describe the purpose of an expenditure. Ethics Commission Rules § 20.61(a).

17. The respondent was required to provide both a category and description for the expenditures at issue because each expenditure exceeded \$100. The respondent did not provide descriptions for the expenditures in the original reports. Therefore, there is credible evidence of violations of section 254.031(a)(3) of the Election Code and section 20.61 of the Ethics Commission Rules.

### **Staff Reimbursements**

18. A campaign finance report must include, for all political expenditures that in the aggregate exceed \$100 and that are made during the reporting period, the full name and address of the persons to whom political expenditures are made and the dates and purposes of the expenditures. ELEC. CODE § 254.031(a)(3).
19. Ethics Commission Rules section 20.62 states that political expenditures 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 \$100 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 \$100 or less made during the reporting period.
20. Credible evidence indicates that the expenditures at issue were not made as staff reimbursements but were made directly to the individuals for services rendered. Therefore, there is credible evidence of no violations of section 254.031(a)(3) of the Election Code and section 20.62 of the Ethics Commission Rules.

**Total Political Contributions of \$50 or Less and Total Political Expenditures of \$100 or Less**

21. Each 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 \$100 or less made during the reporting period. ELEC. CODE § 254.031(a)(5).
22. The respondent left the spaces blank for total political contributions of \$50 or less and total political expenditures of \$100 or less on the report at issue. Therefore, there is credible evidence of a violation of section 254.031(a)(5) of the Election Code.

**Total Political Contributions Maintained**

23. Each report must include as of the last day of the reporting period, 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).
24. The total amount of political contributions maintained in one or more accounts includes balance on deposit in banks, savings and loan institutions and other depository institutions, and the present value of any investments that can be readily converted to cash, such as certificates of deposit, money market accounts, stocks, bonds, treasury bills, etc. Ethics Commission Rules § 20.50(a).
25. Credible evidence indicates that the respondent did not properly disclose total political contributions maintained for the four reports at issue. Therefore, there is credible evidence of violations of section 254.031(a)(8) of the Election Code. In response to the complaint, the respondent corrected the errors.

**Timely Filing of Pre-election Report**

26. In addition to other required reports, for each election in which a person is a candidate and has an opponent whose name is to appear on the ballot, the person shall file two reports. ELEC. CODE § 254.064(a).
27. The second report must be received by the authority with whom the report is required to be filed not later than the eighth day before election day. The report covers the period beginning the 39th day before election day and continuing through the 10th day before election day. *Id.* § 254.064(c).

28. The 8-day pre-election report for the November 6, 2012, general election was required to be filed by October 29, 2012. The respondent filed the report one day late on October 30, 2012. Therefore, there is credible evidence of a violation of section 254.064(c) of the Election Code.

### **Accepting Political Contributions from Corporations**

29. A person may not knowingly accept a political contribution that the person knows was made in violation of chapter 253 of the Election Code. ELEC. CODE § 253.003(b).
30. A corporation or labor organization may not make a political contribution or political expenditure that is not authorized by subchapter D, chapter 253, of the Election Code. *Id.* § 253.094.
31. The prohibition applies to corporations that are organized under the Texas Business Corporation Act, the Texas For-Profit Corporation Law, the Texas Non-Profit Corporation Act, the Texas Nonprofit Corporation Law, federal law, or law of another state or nation. *Id.* § 253.091.
32. Regarding the three contributions at issue, credible evidence indicates that the contributions were not made by corporations. Therefore, there is credible evidence of no violations of sections 253.003 and 253.094 of the Election Code with respect to those contributions.

### **Cash Contributions Exceeding \$100**

33. A person may not knowingly accept a political contribution that the person knows was made in violation of chapter 253 of the Election Code. ELEC. CODE § 253.003(b).
34. 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. *Id.* § 253.033(a).
35. Regarding the \$150 political contribution at issue, there is insufficient evidence to show whether the respondent accepted contributions in cash that exceeded \$100 from a single contributor. Therefore, there is insufficient evidence of a violation of sections 253.003 and 253.033 of the Election Code. Credible evidence indicates that the respondent donated the contribution to charity.

**Conversion to Personal Use**

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. The term does not include payments made to defray ordinary and necessary expenses incurred in connection with activities as a candidate or in connection with the performance of duties or activities as a public officeholder, including payment of rent, utility, and other reasonable housing or household expenses incurred in maintaining a residence in Travis County by members of the legislature who do not ordinarily reside in Travis County, but excluding payments prohibited under Section 253.038; or payments of federal income taxes due on interest and other income earned on political contributions. *Id.* § 253.035(d).
38. A campaign finance report must include, for all political expenditures that in the aggregate exceed \$100 and that are made during the reporting period, the full name and address of the persons to whom political expenditures are made and the dates and purposes of the expenditures. *Id.* § 254.031(a)(3).
39. The purpose of an expenditure means a description of goods, services, or other thing of value and must include a brief statement or description of the candidate, officeholder, or political committee activity that is conducted by making the expenditure. The brief statement or description must include the item or service purchased and must be sufficiently specific, when considered within the context of the description of the category, to make the reason for the expenditure clear. Merely disclosing the category of goods, services, or other thing of value for which the expenditure is made does not adequately describe the purpose of an expenditure. Ethics Commission Rules § 20.61(a).
40. Credible evidence indicates that the expenditure at issue was for parking in connection with a campaign event. Therefore, there is credible evidence of no violation of section 253.035 of the Election Code.
41. Credible evidence indicates that the respondent did not properly disclose the payee name, address, and purpose of the \$250 political expenditure at issue when the July 2013 semiannual report was originally filed. Therefore, there is credible evidence of a violation of section 254.031(a)(3) of the Election Code and section 20.61 of the Ethics Commission Rules.

### **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: 1) each 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; 2) each campaign finance report must include, for all political expenditures that in the aggregate exceed \$100 and that are made during the reporting period, the full name and address of the persons to whom political expenditures are made and the dates and purposes of the expenditures; 3) the purpose of an expenditure means a description of goods, services, or other thing of value and must include a brief statement or description of the candidate, officeholder, or political committee activity that is conducted by making the expenditure; the brief statement or description must include the item or service purchased and must be sufficiently specific, when considered within the context of the description of the category, to make the reason for the expenditure clear; merely disclosing the category of goods, services, or other thing of value for which the expenditure is made does not adequately describe the purpose of an expenditure; 4) a report of a political expenditure by credit card must identify the vendor who receives payment from the credit card company; 5) each 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 \$100 or less made during the reporting period; 6) each report must include as of the last day of the reporting period, 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; and 7) in addition to other required reports, for each election in which a person is a candidate and has an opponent whose name is to appear on the ballot, the person shall file two reports; the second report must be received by the authority with whom the report is required to be filed not later than the eighth day before election day and covers the period beginning the 39th day before election day and continuing through the 10th day before election day.

The respondent agrees to comply with these requirements of the law.

**VI. Confidentiality**

This order and agreed resolution describes certain 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 nature, circumstances, and consequences of the violations described under Sections III and IV, and after considering the sanction necessary to deter future violations, the Commission imposes a \$1,500 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-31410233.

AGREED to by the respondent on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Theresa Daniel, Respondent

EXECUTED ORIGINAL received by the commission on: \_\_\_\_\_.

Texas Ethics Commission

By: \_\_\_\_\_  
Seana Willing, Executive Director