

# TEXAS ETHICS COMMISSION

IN THE MATTER OF  
GORDON HARRIS,  
RESPONDENT

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BEFORE THE  
TEXAS ETHICS COMMISSION  
SC-32506268

**RECEIVED**  
**FEB 6 2026**  
Texas Ethics Commission

## ORDER AND AGREED RESOLUTION

### I. Recitals

The Texas Ethics Commission (“TEC”) met on February 11, 2026, to consider sworn complaint SC-32506268, which was filed on June 27, 2025. A quorum of the TEC was present. The TEC determined that there is credible evidence of violations of Sections 254.031(a)(1), 254.031(a)(5), 254.031(a)(6), 254.031(a)(8), and 254.061(a) of the Election Code, laws administered and enforced by the TEC. To resolve and settle this complaint without further proceedings, the TEC adopted this resolution with a \$100 civil penalty

### II. Allegations

Regarding the respondent’s 30-day pre-election report filed on March 7, 2024, the sworn complaint alleges that the respondent: 1) failed to properly disclose his campaign’s financial activity during this reporting period, in violation of Section 254.031 of the Election Code; and 2) failed to identify the office sought and the election for which the report was filed, in violation of Section 254.061 of the Election Code.

Regarding the respondent’s January 2025 semiannual report filed on January 15, 2025, the complaint also alleges that the respondent failed to disclose the amount of political expenditures that in the aggregate exceeded \$220 and that were made during the reporting period, the full name and address of the persons to whom the expenditures were made, and the dates and purposes of the expenditures, in violation of Section 254.031 of the Election Code.

### III. Findings of Fact and Conclusions of Law

Credible evidence available to the TEC supports the following findings of fact and conclusions of law:

1. The respondent was a candidate in the May 4, 2024, general election for Lubbock City Council, District 2. The respondent was ultimately successful in the June 15, 2024, runoff election.

*The respondent failed to properly report his campaign's financial activity in the March 7, 2024, report.*

2. On March 7, 2024, the respondent filed a campaign finance report in connection with the May 4, 2025, election. Page 2 of the report's coversheet, where a filer discloses total contributions, total expenditures, the contribution balance, and outstanding loan totals was left blank. The respondent also did not include any report schedules reflecting campaign activity during this period.
3. A candidate is required to disclose financial activity during designated reporting periods, including contributions accepted, expenditures made or authorized, total contributions maintained as of the last day of the reporting period, and the principal amount of all outstanding loans as of the last day of the reporting period. *See* Tex. Elec. Code § 254.031(a). If no reportable activity occurs during a reporting period, the person required to file a report shall indicate that fact in the report. *Id.* § 254.031(b).
4. The respondent failed to disclose his campaign's financial activity during the period covered by this report by leaving page 2 of the report's coversheet blank. This is true even if the respondent did not accept any contributions, make any expenditures, maintain any contributions as of the last day of the reporting period, or take out any loans. In that situation, the respondent is still required to mark these sections with a \$0 figure. However, a review of the respondent's 8-day pre-election report filed May 9, 2024, reveals that during the 30-day pre-election reporting period the respondent accepted \$301.67 in political contributions (one of which was over \$110), spent \$252.14 in political expenditures, and loaned his campaign \$25, all of which he incorrectly reported on his 8-day pre-election report.<sup>1</sup> For these reasons, there is credible evidence of violations of Sections 254.031(a)(1), -(5), -(6), and -(8) of the Election Code.

*The respondent failed to identify in his March 7, 2024, report the office sought and the election for which he filed his report.*

5. A candidate's report must include the office sought and the identity and date of the election for which the report is filed. Tex. Elec. Code § 254.061(1). Although the respondent provided the date of the election for which he filed his March 7, 2024, report, he did not identify the office he sought or the election type. Therefore, there is credible evidence of violations of Section 254.061(1) of the Election Code.

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<sup>1</sup> The respondent's 8-day pre-election report covers March 6, 2024, through April 30, 2024. However, all activity between the filing of the respondent's campaign treasurer appointment and March 25, 2024, should be reflected on the respondent's 30-day pre-election report. Additionally, TEC enforcement staff does not have the respondent's itemized bank statements for this period to confirm the individual contributions and expenditures. However, the statement activity summary for this period reflects amounts similar to those TEC enforcement staff calculated based on the respondent's 8-day pre-election report (\$376.67 in contributions and \$272.14 in withdrawals).

*The respondent failed to properly disclose his political expenditures.*

6. The respondent's January 2025 semiannual report disclosed \$3,794 in total political expenditures, no unitemized political expenditures, and a subtotal amount of \$3,794 in political expenditures made from political contributions (Schedule F1). However, the respondent did not itemize any of his expenditures during this reporting period.
7. Each report filed must include: 1) the amount of political expenditures that in the aggregate exceed \$220 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) the total amount or a specific listing of the political expenditures of \$220 or less made during the reporting period. Tex. Elec. Code § 254.031(a)(3), -(5); 1 Tex. Admin. Code § 18.31.
8. A review of the respondent's partial bank records for this period indicate that the majority of his expenditures were below \$220. However, he did incur at least one expenditure over the reporting threshold for \$275. Therefore, because the respondent did not disclose any unitemized political expenditures or itemize the expenditures he made during the January 2025 semiannual reporting period, there is credible evidence of violations of Sections 254.031(a)(3) and 254.031(a)(5) of the Election Code.

#### **IV. Representations and Agreement by Respondent**

1. The respondent neither admits nor denies the findings of fact and conclusions of law described under Section III, and consents to the entry of this order and agreed resolution solely for the purpose of resolving and settling the sworn complaint.
2. The respondent consents to this order and agreed resolution and waives any right to further proceedings in this matter. The respondent consents to enforcement staff presenting this order and agreed resolution to the Commissioners outside of the respondent's presence.
3. The respondent acknowledges the reporting requirements identified in this Order and Agreed Resolution and agrees to fully and strictly comply with the above requirements of law.

#### **V. Confidentiality**

This order and agreed resolution describes violations that the TEC 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 TEC.

## VI. Sanction

The TEC may impose a civil penalty of not more than \$5,000 or triple the amount at issue, whichever amount is more. Tex. Gov't Code § 571.173. The TEC shall consider the following factors in assessing a sanction: 1) the seriousness of the violation, including the nature, circumstances, consequences, extent, and gravity of the violation; 2) the history and extent of previous violations; 3) the demonstrated good faith of the violator, including actions taken to rectify the consequences of the violation; 4) the penalty necessary to deter future violations; and 5) any other matters that justice may require. Tex. Gov't Code § 571.177.

### *The Amount at Issue*

Between the report the respondent filed March 7, 2024, and his January 2025 semiannual report, the respondent failed to properly disclose at least \$301.67 in political contributions and at least \$4,046.14 in political expenditures. This places the maximum civil penalty the TEC can impose at \$13,043.43.

### *Factor 1: The Seriousness of the Violation*

The respondent failed to properly disclose over \$4,000 in political activity, which caused significant harm to public disclosure.

### *Factor 2: The History and Extent of Previous Violations*

The respondent has no previous violations.

### *Factor 3: The Demonstrated Good Faith of the Violator*

Although the respondent has failed to correct his reports, he has cooperated with TEC enforcement staff throughout the complaint process, which has included the respondent driving from Lubbock to Austin to work on his reports in person with TEC enforcement staff. Despite these efforts, however, the respondent's bank statements do not provide the necessary detail to properly report all of his activity and it appears that the respondent does not have any other documentation to rely upon.<sup>2</sup> Therefore, if the respondent amends his reports based on the information he currently has, it is possible that the amended reports may not accurately reflect all of the respondent's activity.

### *Factor 4: The Penalty Necessary to Deter Future Violations*

Based on the amount at issue, a civil penalty is warranted in this case. However, the respondent has indicated to TEC enforcement staff that he understands the importance of his reporting obligations and will make every effort to fully and accurately disclose his activity on future reports.

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<sup>2</sup> This includes in-kind contributions as well as general withdrawals and deposits into his campaign account.

*Factor 5: Any Other Matters that Justice May Require*

Although the amount at issue in this case is not minor, the respondent has informed TEC enforcement staff that he is on a fixed income and his campaign account contains less than \$100. Therefore, anything more than a \$100 civil penalty would be a significant financial hardship.

*Conclusion*

After considering the factors prescribed by Section 571.177 of the Government Code, the TEC imposes a \$100 civil penalty.

**VII. Order**

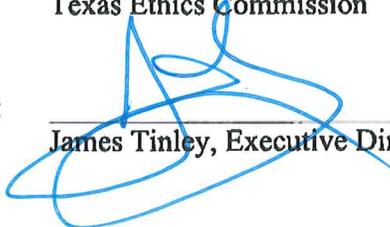
The TEC hereby orders that if the respondent consents to this Order and Agreed Resolution, it is a final and complete resolution of SC-32506268.

AGREED to by the respondent on this 2<sup>nd</sup> day of February, 2026.

  
Gordon Harris, Respondent

EXECUTED by the Texas Ethics Commission on: 2-19-26.

Texas Ethics Commission

By:   
James Tinley, Executive Director