TEXAS ETHICS COMMISSION

IN THE MATTER OF	§	**BEFORE THE**
	§	
CHARLOTTE MOSES,	§	**TEXAS ETHICS COMMISSION**
	§	
RESPONDENT	§	**SC-3260141**

RECEIVED
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Texas Ethics Commission

ORDER
AND
AGREED RESOLUTION

I. Recitals

The Texas Ethics Commission (TEC) met on September 23, 2026, to consider resubmitted sworn complaint SC-3260141, which was filed on January 20, 2026. A quorum of the TEC was present. The TEC determined that there is credible evidence of violations of Sections 253.033 and 253.035 of the Election Code and TEC Rules 20.63, 20.215, and 22.19.

To resolve and settle this complaint without further proceedings, the TEC adopted this resolution imposing a $956.45 civil penalty, contingent on the respondent transferring $2,000 to a recognized 501(c)(3) charitable organization of a non-political nature.

II. Allegations

The sworn complaint alleged that, as a candidate for the office of Mayor of the City of Port Arthur, the respondent: 1) failed to fully or accurately report political contributions accepted on her 30-day pre-election campaign finance report, in violation of Section 254.031 of the Election Code; 2) failed to fully or accurately report political expenditures made on her 30-day pre-election campaign finance report, in violation of Section 254.031 of the Election Code; and 3) failed to file an 8-day pre-election campaign finance report for the May 3, 2025 election, in violation of Section 254.064 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 for the office of Mayor of the City of Port Arthur in the election held on May 3, 2025. The respondent advanced to a runoff election held on June 7, 2025. The respondent was elected mayor in the runoff election.

2. The respondent timely filed her 30-day pre-election campaign finance report on April 2, 2025. This report purported to cover a period beginning on August 30, 2024. Its cover sheet reports $28,090.16 in total monetary political contributions and $21,933.12 in

total monetary political expenditures for this period. However, attached Schedules A1 and F1 only individually identified $10,200.00 in itemized political contributions and $18,900.52 in itemized political expenditures, respectively.

3. The respondent subsequently timely filed a runoff campaign finance report on May 29, 2025. The runoff campaign finance report purported to cover the time period between April 3, 2025, and May 27, 2025. However, this report also contained political contributions and expenditures pre-dating April 3, 2025. The runoff campaign finance report listed $16,540.00 in total monetary political contributions and $14,631.25 in total monetary political expenditures.

4. While the runoff campaign finance report contained some of the same political contributions previously identified in the 30-day pre-election campaign finance report, the runoff campaign finance report contained several additional itemized political contributions. Some of these contributions were made during the period purportedly covered by the 30-day pre-election campaign finance report, but were not disclosed in that report.

5. Included in the runoff campaign finance report were twenty-nine political contributions, totaling $10,872.54, including the word "cash" somewhere in the entry. Some of these contributions contained a description of the event giving rise to the contribution (e.g., "Fundraiser"), but none of these entries included the name or address of the individual or entity who made the contributions.

6. Also included in the runoff campaign finance report were multiple political contributions attributed to the Square point-of-sale application. These contributions took place in both the years 2024 and 2025.

7. Upon request by the TEC, the respondent provided receipts from some of her Square transactions made in the year 2025. Based on these receipts, the TEC was able to ascertain the identities of the individuals who made some of the contributions attributed to the Square application in the runoff campaign finance report. However, the respondent did not produce receipts corresponding to eight contributions, totaling $457.19, made in the year 2024 and on January 9, 2025, attributed to the Square application in the runoff campaign finance report.

8. The respondent was unable to produce receipts or records related to these eight contributions attributed to the Square application in the runoff campaign finance report. Further, the respondent was unable to produce receipts or records identifying the individual contributors for the twenty-nine political contributions including the word "cash" in the runoff campaign finance report.

9. In response to these allegations, the respondent sought to file corrected campaign finance reports. On April 15, 2026, respondent filed corrected campaign finance reports with the proper filing authority, and sent those corrected reports to TEC.

10. In the corrected campaign finance reports, the respondent properly disclosed the previously unaccounted for Square transactions. In addition, the respondent identified the individuals who made the cash contributions. According to the corrected report, the respondent accepted numerous cash contributions that, when aggregated with other cash contributions from the same contributor during the same reporting period, exceeded the $100 limit. The cash contributions from contributors that, in the aggregate, exceeded $100 during the reporting periods at issue totaled $8,772.54. There is therefore credible evidence of violations of Section 253.033 of the Election Code.

11. The corrected campaign finance reports further indicate the respondent made several campaign expenditures to herself, many of which were labeled as being for reimbursement. These expenditures totaled $956.45.

12. The respondent did not initially properly report the campaign expenditures from her personal funds nor designate those expenditures as being subject to reimbursement. *See* Tex. Elec. Code § 253.035(h) (allowing reimbursement only if underlying expenditures from personal funds were properly reported); 1 Tex. Admin. Code § 20.63(e) (failure to properly report underlying expenditures may not be cured by filing a corrected report after original filing deadline). There is therefore credible evidence of violations of Section 253.035 of the Election Code and TEC Rules 20.63, 20.215, and 22.19.

13. The respondent filed corrected reports identifying her underlying campaign expenditures from personal funds on July 9, 2026.

14. As a condition of this Order and Agreed Resolution, the respondent has transferred $2,000, representing a portion of the unlawful cash contributions accepted, to a recognized 501(c)(3) charitable organization of a non-political nature.

IV. Representations and Agreement by Respondent

By signing this Order and Agreed Resolution and returning it to the TEC:

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 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 TEC staff presenting this Order and Agreed Resolution to the Commissioners outside of the respondent's presence.

3. The respondent acknowledges that a candidate may not accept cash political contributions from a contributor that, in the aggregate, exceed $100 in a reporting period. The respondent further acknowledges that a candidate may only reimburse themselves with campaign funds in accordance with Section 253.035(h) of the Election Code and TEC Rules 20.63, 20.215, and 22.19.

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.

Factor 1: The Seriousness of the Violation

The violations are serious. The respondent accepted $8,772.54 in unlawful cash contributions in violation of the clear prohibition found in Section 253.033 of the Election Code. The respondent did not file corrected campaign finance reports until April 15, 2026, nearly a full year after the election was held.

Additionally, the respondent used $956.45 of campaign funds to reimburse herself for unidentified expenditures from personal funds. The respondent did not properly disclose the campaign expenditures made from personal funds for which she reimbursed herself until July 9, 2026, more than a full year after the election was held.

Factor 2: The History and Extent of Previous Violations

The respondent has no prior violations.

Factor 3: The Demonstrated Good Faith of the Violator

The respondent was at first dismissive about her reporting obligations, disputing that she was required to fully identify her contributors but has ultimately attempted to cooperate with TEC enforcement staff. The respondent did promptly file amended campaign finance reports when confronted with the defects in her initial reports, despite the fact that those amended reports revealed additional reporting violations. Upon further consultation with TEC enforcement staff, respondent also ultimately corrected her reporting surrounding her reimbursing herself with campaign funds.

Factor 4: The Penalty Necessary to Deter Future Violations

The respondent has no prior violations, and the circumstances do not suggest intent to conceal activity. However, the seriousness of the violations requires a substantial penalty.

Factor 5: Any Other Matters That Justice May Require

It is not in the public interest that filers be permitted to keep contributions that they accepted illegally or that they cannot identify. In *In re Hinojosa*, the TEC required the respondent to donate *all* of the $5,668.85 in cash contributions that he accepted at an event. *See In re Hinojosa*, SC-32408454 (June 13, 2025). Some mitigating factors apply here, such as the respondent's inability to refund or donate all of the cash contributions. Therefore, this Order and Agreed Resolution requires that the respondent donate $2,000 of the illegally accepted cash contributions to a 501(c)(3) charitable organization. This Order and Agreed Resolution further imposes a penalty reflecting the amount of improper reimbursements made from campaign contributions, in lieu of requiring the respondent to return those funds to her campaign account. *See* Tex. Elec. Code § 253.035(h) (candidate who makes political expenditures from the candidate's personal funds may reimburse those personal funds from political contributions only if the expenditures were properly reported and designated as subject to reimbursement in the report required to be filed under Title 15, Election Code that covers the period in which the expenditures from personal funds were made).

Conclusion

After considering the factors prescribed by Section 571.177 of the Government Code, the TEC imposes a $956.45 civil penalty for the respondent's improper reimbursements and the respondent's acceptance of unlawful cash contributions.

VII. Order

The TEC hereby orders that if the respondent consents to the proposed resolution, this order and agreed resolution is a final and complete resolution of SC-3260141.

AGREED to by the respondent on this 28th day of July, 2026.

Charlotte M. Moses

Charlotte Moses, Respondent

EXECUTED by the TEC on: 9-24-26.

Texas Ethics Commission

By:

James Tinley, Executive Director