

TEXAS ETHICS COMMISSION

IN THE MATTER OF

KIM GREAVES,

RESPONDENT

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BEFORE THE

TEXAS ETHICS COMMISSION

SC-3260290



ORDER AND AGREED RESOLUTION

I. Recitals

The Texas Ethics Commission ("TEC") met on September 23, 2026, to consider sworn complaint SC-3260290, which was filed on February 4, 2026. A quorum of the TEC was present. The TEC determined that there is credible evidence of violations of Section 254.031(a)(1) and -(a)(6) 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 \$500 civil penalty

II. Allegations

The sworn complaint alleges that the respondent: 1) failed to properly disclose the in-kind contributions he accepted from Westlake Excellence PAC during the 30-day and 8-day pre-election reporting periods associated with the May 4, 2024 election, as well as the July 2024 semiannual reporting period, in violation of Section 254.031 of the Election Code; and 2) failed to include a political advertising disclosure statement on materials distributed in connection with an event preceding a Westlake town hall meeting in May of 2024, in violation of Section 255.001 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 successful non-incumbent candidate for mayor of Westlake, Texas, in the May 4, 2024 election.
2. A general-purpose political committee called the Westlake Excellence PAC made political expenditures supporting the respondent and other Westlake candidates in the weeks preceding the election. These expenditures were for digital and mail advertising. The PAC did not designate them as direct campaign expenditures.

3. The respondent reported accepting an in-kind contribution of \$5,150.27 from the Westlake Excellence PAC on his July 2024 semiannual report, filed after the election. However, he did not identify any contributions from the PAC on the reports preceding the election.
4. In response to the complaint, the respondent acknowledged that this contribution should have been reported on his 8-day pre-election report. There is therefore credible evidence of a violation of Section 254.031 of the Election Code for failure to disclose the PAC contribution on the correct report.
5. The respondent filed corrected reports addressing the issue.
6. The sworn complaint further alleges that the respondent failed to report accepting contributions in connection with a post-election food truck event near the town hall, and that he failed to include a political advertising disclosure statement on a flyer promoting the event.
7. In response to the complaint, the respondent filed a sworn statement in which he denied that he was involved in planning the event or distributing the flyer. According to the respondent, he wasn't aware that he was the event's nominal host until he arrived. Therefore, there is no credible evidence of a violation for failure to report in-kind contributions associated with the event or in connection with the flyer's contents.

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 them.

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

The respondent did not report \$5,150.27 in contributions until after the election.

Factor 1: The Seriousness of the Violation

The respondent's failure to report the activity on the correct report meant that the public had no formal notice of it until voting was over. However, the PAC made no secret of its support for the respondent and the other candidates on his ticket, which reduced the harm to 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

There is no evidence that the respondent intentionally delayed reporting the contributions from the PAC. Further, he responded to the complaint and promptly filed corrected reports when requested.

Factor 4: The Penalty Necessary to Deter Future Violations

A penalty must be imposed to underline the importance of timely reporting.

Factor 5: Any Other Matters that Justice May Require

None.

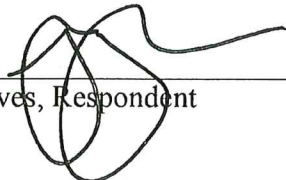
Conclusion

After considering the factors prescribed by Section 571.177 of the Government Code, the TEC imposes a \$500 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-3260290.

AGREED to by the respondent on this 23 day of June, 2026.

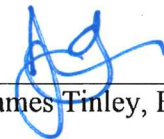


Kim Greaves, Respondent

EXECUTED by the Texas Ethics Commission on: 9-24-26.

Texas Ethics Commission

By:



James Tinley, Executive Director