

TEXAS ETHICS COMMISSION
P.O. Box 12070, Austin, Texas 78711-2070
(512) 463-5800

Chris Flood, Chair
Patrick W. Mizell, Vice Chair
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Geanie W. Morrison
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Joseph O. Slovacek
Mark Strama

MEETING AGENDA

Date and Time:	9:00 a.m., Wednesday, September 17, 2025
Location:	Room E1.014, Capitol Extension, Austin, Texas

**INFORMATION ON HOW TO VIEW AND/OR PARTICIPATE IN THE ONLINE
BROADCAST OF THIS MEETING WILL BE POSTED ON OUR WEBSITE ON THE
DAY OF THE MEETING HERE:**

https://www.ethics.state.tx.us/meetings/meetings_2025-2029.php#2025

1. Call to order; roll call.
2. Discussion and possible action related to the hiring of TEC's general counsel.
3. Discussion regarding dates for the next quarterly Commission meeting.
4. Approve minutes for the following meetings:
 - o Executive Session – June 12, 2025; and
 - o Public Agenda – June 12, 2025.

RULEMAKING

Rule Adoption

5. Discussion and possible action on the adoption or proposal and re-publication in the Texas Register regarding amendments to 1 Tex. Admin. Code § 18.31, regarding adjustments to reporting thresholds.

Rule Publication

6. Discussion and possible action on the proposal and publication in the Texas Register regarding re-adoption of Chapter 34 of the TEC rules, related to regulation of lobbyists.

For more information, contact James Tinley, Executive Director, at (512) 463-5800.

7. Discussion and possible action on the proposal and publication in the Texas Register regarding re-adoption of Chapter 22 of the TEC rules, related to restrictions on contributions and expenditures.
8. Discussion and possible action on the proposal and publication in the Texas Register regarding re-adoption of Chapter 24 of the TEC rules, related to restrictions on contributions and expenditures applicable to corporations and labor organizations.
9. Discussion and possible action regarding the TEC's comprehensive review its rules, including closing rule reviews for the following chapters: Chapter 6 (Organization and Administration), chapter 8 (Advisory Opinions), Chapter 10 (Ethics Training Programs), Chapter 12 (Sworn Complaints), Chapter 13 (Referrals to Prosecutors), Chapter 18 (General Rules Concerning Reports), Chapter 28 (Reports by a Candidate for Speaker of the House of Representatives) and Chapter 40 (Financial Disclosure for Public Officers).

ADVISORY OPINIONS

10. Advisory Opinion Request No. AOR-727: May an incorporated out-of-state political committee that accepts corporate contributions contribute to Texas state and local candidates, including to a specific-purpose committee, provided it does so from a separate account that only accepts contributions from individuals and that would otherwise come from permissible sources under Texas law?

Second, assuming the contributions described under the facts above are permissible, does it matter if the out-of-out state political committee is controlled by a non-candidate officeholder?

Third, if control by a candidate leads to the conclusion that the out-of-state committee is prohibited from making the contributions described above, would it be permissible for the out-of-state committee to: (i) contribute to a Direct Campaign Expenditure Only Committee or (ii) make direct expenditures itself?

This opinion construes Sections 252.001(15), 252.003(a), 253.032, 253.097, 254.1581, of the Election Code.

11. Advisory Opinion Request No. AOR-731: Whether members of the State Employee Charitable Campaign are appointed officers required to file a Personal Financial Statement.

This opinion construes Chapter 572 of the Government Code.

12. Advisory Opinion Request No. AOR-732: Whether a member of the legislature may use campaign funds to reimburse lodging and meal expenses incurred in connection with officeholder duties during the interim if the member also receives a state per diem for that day of legislative work.

This opinion construes Chapter 254 of the Election Code.

13. Advisory Opinion Request No. AOR-733: Whether certain Public Service Announcements produced by a non-profit and featuring Texas state elected officials would trigger any campaign finance reporting requirements or require a political advertising disclosure statement.

This opinion construes Chapter 254 of the Election Code.

14. Advisory Opinion Request No. AOR-734: Whether a current State Board of Education (SBOE) member can provide continuing professional development to educators in return for compensation during their SBOE service.

This opinion construes Chapter 572 of the Government Code and Chapter 36 of the Penal Code.

15. Advisory Opinion Request No. AOR-735: Whether the TEC has authority to assess a civil penalty for a late personal financial statement filed by a director of the Harris County-Houston Sports Authority?

This opinion construes Chapter 572 of the Government Code and Sections 335.1085 and 335.110 of the Local Government Code.

ADMINISTRATIVE WAIVER OF FINES, TREASURER TERMINATIONS AND REPORTS MORE THAN 30 DAYS LATE

16. Discussion and possible action on appeals of determinations made under 1 Tex. Admin. Code §§ 18.11, 18.25 and 18.26 relating to administrative waiver or reduction of a civil penalty to an untimely filed report, for the following filers:

Staff Recommendation: Waiver

- A. Cook, Molly C. (00086313)
- B. Crownover, Buffy (00087462)
- C. Doyle, Michael P., Campaign Treasurer, Harris County Republican Party (CEC) (15507)
- D. Garza-Steele, Vivian, Campaign Treasurer, Zachry Corporation Political Action Committee (00017353)
- E. Graves, Brooke, Campaign Treasurer, High Plains Republican Women PAC (00054835)
- F. Herrera, Diane, Campaign Treasurer, Leander Area Republican Women (00085167)
- G. Kosich, Nicole Amy (00088275)
- H. Moré, Janette, Campaign Treasurer, Travis County Republican Party (CEC)(00039023)
- I. Otts, Barry (00087994)
- J. Raymond, Carlos Antonio (00080137)
- K. Snelgrooes, Kimberly, Campaign Treasurer, Panhandle First (00087989)
- L. Snowden, Tara D. (00060389)

For more information, contact James Tinley, Executive Director, at (512) 463-5800.

M. Zachary, Linda (00058757)

Staff Recommendation: Reduction

N. Bendele, Fohn (00087669)

O. Bess, Danielle (00086211)

P. Blair, Emily, Campaign Treasurer, Austin Apartment Association PAC (00016265)

Q. Esquenazi, James, Campaign Treasurer, Killeen Firefighters for Responsible Government (00081138)

R. Hopkins, Perla Muñoz (00086384)

S. Ramirez, Gocha Allen (00083328)

T. Rublein, Aaron, Campaign Treasurer, Houston LGBTQ+ Political Caucus PAC (00016168)

U. Trimble, James, Campaign Treasurer, Haltom City Firefighters Committee for Responsible Government (00065031)

Staff Recommendation: No Further Reduction or Waiver

V. Armstrong, Lisa, Campaign Treasurer, We Love Odessa (00088878)

17. Discussion and possible action regarding the termination of a campaign treasurer appointment for the following inactive political committees:

Individuals

1. Arrieta, Alejandro (00086356)
2. Byrn, Charles D., Jr. (00088141)
3. Cantu, Robert (00088172)
4. Carmona, Omar (00087731)
5. Crenshaw, Sandra (00069780)
6. Freeman, Dawn E. (00088010)
7. Guillory James O., II (00085736)
8. LeBlanc, Jeinay (00088325)
9. Mazzola, Brian N. (00088206)
10. McDaniel, Joe S. (00088221)
11. Price, Albert J., Jr. (00087663)
12. Ramirez, Larissa (00088089)
13. Sloan, Terry L. (00087999)
14. Walton, Victoria (00082438)

Political Committees

15. Citizens for the Students of Boling ISD, Kem Ford, Treasurer (00088760)
16. Friends for Katy Schools, Jason T. Walker, Treasurer (00087882)

For more information, contact James Tinley, Executive Director, at (512) 463-5800.

17. Grand Prairie Strong, Peter Salas, Treasurer (00088637)
18. Keep Collin Red, Christine Vorderbruggen, Treasurer (00086580)
19. Red River Patriots PAC, Ryan Benjamin Davis, Treasurer (00088304)
20. Save Texas Now, Lance Cargill, Treasurer (00085775)
21. Vote YES for New Diana Kids PAC, Joshua Sims, Treasurer (00088658)
22. Wylie Bulldogs United for Growth Bond 2023, Jud Beall, Treasurer (00088048)

OTHER MATTERS

18. Briefing, discussion and possible action, including the formation of a subcommittee of legislation regarding new legislation from the 89th Regular and Special Legislative Sessions, including the implementation SB 293, SB 869, SB 2514, HB 119, HB 551, and actions taken or in-progress to implement recommendations made in the Sunset Advisory Commission report on the TEC.
19. Discussion and possible action related to extending or otherwise amending existing contracts (Nos. OCC 2023-356-0089 and OCC 2024-356-0503) with Butler Snow, LLP, or entering into new contracts with Bulter Snow, LLP for legal services in connection with the same scope of legal services described in the existing contracts (Nos. OCC 2023-356-0089 and OCC 2024-356-0503).
20. Adjourn.

CERTIFICATION: I certify that I have reviewed this document and that it conforms to all applicable Texas Register filing requirements. Certifying Official & Agency Liaison: James Tinley, Executive Director.

NOTICE: Under the Americans with Disabilities Act, an individual with a disability must have an equal opportunity for effective communication and participation in public meetings. Upon request, the Texas Ethics Commission will provide auxiliary aids and services, such as interpreters for the deaf and hearing impaired, readers, and large print or Braille documents. In determining the type of auxiliary aid or service, the Commission will give primary consideration to the individual's request. Those requesting auxiliary aids or services should notify Margie Castellanos at (512) 463-5800 or RELAY Texas at (800) 735-2989 two days before this meeting so that appropriate arrangements can be made. Please also contact Ms. Castellanos if you need assistance in having English translated into Spanish.