

FEB 25 2025

GALVESTON COUNTY, TEXAS  
BY [Signature] 11:48 am DEPUTY

CAUSE NO. 22-CV-1130

TEXAS ETHICS COMMISSION,  
*Plaintiff,*

v.  
MATT WIGGINS,  
*Defendant.*

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IN THE DISTRICT COURT OF

GALVESTON COUNTY, TEXAS

405TH JUDICIAL DISTRICT

**AGREED FINAL JUDGMENT**

On this day, Matt Wiggins (Wiggins), and the Texas Ethics Commission (Commission), submitted this Agreed Final Judgment to the Court for approval. By the duly authorized signatures subscribed to this Judgment, all parties represent to the Court that they agree to the terms of this Agreed Final Judgment.

This Court finds it has jurisdiction over this suit pursuant to Texas Government Code § 571.133.

The Court further finds that, after reviewing the pleadings on file, this Agreed Final Judgment to be meritorious, proper, necessary, and in the best interest of justice.

**IT IS THEREFORE ORDERED, ADJUDGED, and DECREED** that Wiggins, and Commission their officers, agents, servants, employees, and all other persons acting in concert or participation with them, on their behalf, or under their control, whether directly or indirectly, are bound herein to the following provisions:

**I. DEFINITIONS**

1. As used in this Agreed Final Judgment, the words and terms set forth below shall have the following meanings:

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- a. **"Agreed Final Judgment" or "Judgment"** means this Agreed Final Judgment.
- b. **"Effective Date"** means the date this Judgment is signed by the Court.
- c. **"Wiggins"** means Matt Wiggins, his agents, employees, and all other persons acting in concert or participation with his, on his behalf, or under his control, whether directly or indirectly.
- d. **"Commission"** means the Texas Ethics Commission.
- e. **"Parties"** means Matt Wiggins and the Commission, collectively.

## **II. PARTIES BOUND**

2. This Agreed Final Judgment applies to and is binding upon the Commission and Wiggins, as well as the agents, representatives, successors, predecessor, divisions, subsidiaries, present and former officers, and all other persons acting in concert with Wiggins, on his behalf, or under his control, whether directly or indirectly.

3. Nothing in this Agreed Final Judgment shall be construed to create any rights in, or grant any cause of action to, any person not a party to this Agreed Final Judgment.

## **III. COMMITMENTS BY PARTIES**

4. Wiggins acknowledges that (1) he received a copy of this Agreed Final Judgment (2) the terms of the Judgment are not ambiguous.

## **IV. STIPULATIONS**

5. This Agreed Final Judgment specifically includes but is not limited to the following: sworn complaints SC-32009187, SC-32010205, SC-32011255; the Commission's Final Order on *In the Matter of Matthew D.*

Wiggins; as well as this action, *Matt Wiggins v. Texas Ethics Commission* (Cause No. 22-CV-1130).

6. Sworn Complaint SC-32009187 alleged that Wiggins, as an officer of a political subdivision, knowingly spent or authorized the spending of public funds for political advertising in the form of two newsletters dated March 10, 2020, and April 9, 2020, in violation of Section 255.003(a) of the Election Code.

7. Sworn Complaint SC-32010205 alleged that Wiggins, as an officer of a political subdivision, knowingly spent or authorized the spending of public funds for political advertising in the form of a newsletter dated September 8, 2020, in violation of Section 255.003(a) of the Election Code.

8. Sworn Complaint SC-32011255 alleged that Wiggins, as an officer of a political subdivision, knowingly spent or authorized the spending of public funds for political advertising in the form of a newsletter dated October 8, 2020, in violation of Section 255.003(a) of the Election Code. Sworn complaint SC-32011255 also alleged Wiggins knowingly caused to be published, distributed, or broadcast political advertising containing express advocacy that did not include a political advertising disclosure statement, in violation of Section 255.001 of the Election Code; and did not include the highway right-of-way notice on political advertising signs, in violation of Section 259.001 of the Election Code.

9. On February 24, 2022, The Texas Ethics Commission convened, and it was the majority vote that it was their belief that Wiggins committed violations in reference to SC-32009187, SC-32010205 and SC-32011255.

10. Wiggins appealed the findings of the Texas Ethics Commission, and a *de novo* trial was set in the 405<sup>th</sup> District Court. Prior to the presentation of evidence before the jury, this Agreed Final Judgment was agreed.

11. Despite the Texas Ethics Commission's findings on February 24, 2022, The Texas Ethics Commission agrees to nonsuit this case with prejudice and not pursue this matter further.

12. By agreeing to this Agreed Final Judgment, Wiggins neither admits nor denies the alleged violations in SC-32009187, SC-32010205 and SC-32011255 and in the Commission's Final Order *In the Matter of Matthew D. Wiggins*. To avoid further hearings and the inconvenience of litigation, Wiggins agrees to the entry of this Agreed Final Judgment.

13. Parties consent to this Agreed Final Judgment waives any right to further proceedings in this matter.

## VI. RETENTION OF JURISDICTION

14. This Court retains jurisdiction over both the subject matter of this Judgment and the Parties for the duration of the performance of the terms and provisions of this Judgment for the purpose of enabling Wiggins or the Commission to apply to the Court at any time for such further direction or

relief as may be necessary or appropriate for the construction or modification of this Judgment, to effectuate or enforce compliance with its terms, or to resolve a dispute.

## **VII. MODIFICATIONS**

15. This Agreed Final Judgment may be modified only upon the written consent of all the Parties and the consent of the Court. All modifications of this Agreed Final Judgment shall become effective as of the date of approval by this Court.

16. No informal advice, guidance, suggestion, or comment (whether oral, written, or electronic) by any representative of the Commission shall relieve a party of its obligation to obtain any formal written approvals as may be required by this Agreed Final Judgment for a modification and to comply with all the requirements of this Agreed Final Judgment.

## **VIII. GENERAL PROVISIONS**

17. This Agreed Final Judgment constitutes the entire agreement between the Parties to the Agreed Final Judgment and supersedes all prior agreements, prior agreed orders, understandings between the Parties relating to this case, prior to the Effective Date of this Agreed Final Judgment.

18. This Agreed Final Judgment may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreed Final Judgment may be

transmitted by facsimile or email to the other Party, which shall constitute an original signature for all purposes.

19. Each of the undersigned representatives of a party to this Agreed Final Judgment certifies that he or she is fully authorized to enter the terms and conditions of the Agreed Final Judgment and to legally execute and bind that party to this Agreed Final Judgment.

20. The Commission shall be allowed such writs and processes as may be needed for the enforcement of this Agreed Final Judgment.

21. The Commission is not required to file a bond in support of this Agreed Final Judgment.

22. The Parties hereby waive the right to appeal from this Agreed Final Judgment.

23. The Parties agree that this dispose of all matters connected to the Texas Ethics Commissions investigation and prosecution of matters associated with SC-32009187, SC-32010205 and SC-32011255 and in the Commission's investigation and prosecution related to Order *In the Matter of Matthew D. Wiggins* and Cause NO. 22-CV-1130.

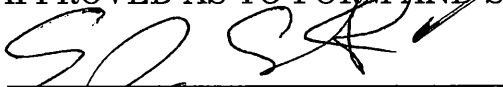
24. **IT IS FURTHER ORDERED AND DECREED**, that all relief requested in this case and not expressly granted is denied. This is a FINAL JUDGMENT, for which let execution and all writs and processes necessary to enforce this FINAL JUDGMENT issue. This Agreed Final Judgment finally disposes of all parties and all claims in this cause.

SIGNED on 25 February 2025



JUDGE PRESIDING

APPROVED AS TO FORM AND SUBSTANCE AND ENTRY REQUESTED:



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