TEXAS ETHICS COMMISSION

IN THE MATTER OF	§	**BEFORE THE**
	§	
STACI WILLIAMS,	§	**TEXAS ETHICS COMMISSION**
	§	
RESPONDENT	§	**SC-32408446**

ORDER
and
AGREED RESOLUTION

I. Recitals

The Texas Ethics Commission (TEC) held a preliminary review hearing on September 17, 2025, to consider sworn complaint SC-32408446. A quorum of the TEC was present. The TEC determined that there is credible evidence of violations of Section 254.031 of the Election Code, a law administered and enforced by the TEC.

To resolve and settle this complaint without further proceedings, the TEC adopted this resolution with a $2,500 civil penalty. If the respondent does not pay the $2,500 civil penalty within 30 days of the date of this Order, then the TEC orders that an additional $2,500 civil penalty be imposed pursuant to Section 571.173 of the Government Code for delay in complying with this Order and Agreed Resolution, and that the agreed-upon penalty and the additional $2,500 penalty be referred to the Office of the Attorney General of Texas for collection.

II. Allegations

The sworn complaint alleged that the respondent did not properly disclose total political contributions maintained as of the end of the reporting periods on her campaign finance reports, and/or that she did not properly disclose political contributions, loans, and/or political expenditures on her campaign finance reports, in violation of Section 254.031 of the Election Code. The allegations relate to the following five reports: the July 2023 semiannual report, the January 2024 semiannual report, the 30-day and 8-day pre-election reports for the March 5, 2024 primary election, and the July 2024 semiannual report.

III. Findings of Fact and Conclusions of Law

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

1. The respondent was a successful candidate for Texas Fifth District Court of Appeals, Chief Justice, in the March 5, 2024 primary election, but lost the November 5, 2024 general election. At all relevant times, the respondent was the district judge for the 101st district court.

2. The respondent admitted "accounting errors" in her initial response, and subsequently filed the campaign finance reports at issue. The respondent filed amended campaign finance reports on April 15, 2025.

3. Because the respondent properly disclosed the total political contributions, total political expenditures, and total political contributions maintained on the July 2023 semiannual report, there is no credible evidence of a violation of Section 254.031 of the Election Code.

4. The respondent moved residences during the time that the January 2024 semiannual report was due. The December 2023 bank statements were mailed to the respondent's old home address, but rather than filing the January 2024 semiannual report late, the respondent filed the semiannual report without disclosing the transactions made during December. Therefore, there is credible evidence of a violation of Section 254.031 of the Election Code for failing to properly disclose the total political contributions and total political expenditures on the January 2024 semiannual report.

5. During the 30-day and 8-day pre-election reporting periods and the July 2024 semiannual reporting period, the respondent's online fundraising page on Anedot suffered a bot attack that resulted in fraudulent payments and complicated her reporting. As a result, the respondent had substantial amounts in contributions and expenditures that were not reported on her original reports. Therefore, there is credible evidence of violations of Section 254.031 of the Election Code for failing to properly disclose the total political contributions and total political expenditures on the 30-day pre-election report, 8-day pre-election report, and July 2024 semiannual report. There is credible evidence of a violation of Section 254.031 of the Election Code for failing to properly disclose the total political contributions maintained on the 30-day pre-election report.

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.

3. The respondent acknowledges that a candidate must comply with the campaign finance reporting requirements under Section 254.031 of the Election Code. The respondent agrees to fully and strictly comply with this requirement 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 below factors in assessing a sanction:

Factor 1: The Seriousness of the Violation

The respondent's amended reports revealed $127,566.24 in contributions and $314,169.68 in expenditures that were not reported on her original reports. The majority of these political contributions were from attorneys or law firms, with many of the contributions being for $5,000. While the TEC takes into consideration that the respondent's online fundraising page on Anedot suffered a bot attack during the 2024 primary campaign, the respondent left her reports uncorrected until this sworn complaint was filed. Because of this, the public was not informed of who funded her campaign until after the election.

Factor 2: The History and Extent of Previous Violations

The records on file with the TEC show that the respondent has a history of not properly disclosing her campaign activity on her pre-election reports.

Factor 3: The Demonstrated Good Faith of the Violator

While the respondent filed the campaign finance reports at issue, the respondent did not file the reports until a year after the election occurred. However, the TEC takes into consideration that the respondent did not have any help when she conducted the accounting of her contributions and expenditures on the five reports at issue.

Factor 4: The Penalty Necessary to Deter Future Violations

There is no reason to believe that the respondent intended to conceal any of her campaign activity. However, a penalty is necessary in order to deter future violations with significant disclosure consequences.

Factor 5: Any Other Matters that Justice May Require

The first four factors address the relevant concerns.

Conclusion

After considering the factors, the TEC imposes a $2,500 civil penalty. If the respondent does not pay the $2,500 civil penalty within 30 days of the date of this Order, then the TEC orders that an additional $2,500 civil penalty be imposed pursuant to Section 571.173 of the Government Code for delay in complying with this Order and Agreed Resolution, and that the agreed-upon penalty and the additional $2,500 penalty be referred to the Office of the Attorney General of Texas for collection.

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-32408446.

AGREED to by the respondent on this 15 day of October, 2025.

Staci Williams, Respondent

EXECUTED by the TEC on: 10-16-25.

Texas Ethics Commission

By:

James Tinley, Executive Director