

TEXAS ETHICS COMMISSION

IN THE MATTER OF
MICHELLE MOLINA,
RESPONDENT

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BEFORE THE
TEXAS ETHICS COMMISSION
SC-32410568

RECEIVED
MAY 30 2025
Texas Ethics Commission

ORDER and AGREED RESOLUTION

I. Recitals

The Texas Ethics Commission (TEC) met on September 17, 2025, to consider sworn complaint SC-32410568. A quorum of the TEC was present. The TEC determined that there is credible evidence of violations of Sections 254.063 and 254.064 of the Election Code.

To resolve and settle this complaint without further proceedings, the TEC adopted this resolution imposing a \$1,000 civil penalty. If the respondent does not pay the \$1,000 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: 1) failed to file a January 2024 semiannual campaign finance report, which was due by January 16, 2024, in violation of Section 254.063 of the Election Code; 2) failed to file a July 2024 semiannual campaign finance report, which was due by July 15, 2024, in violation of Section 254.063 of the Election Code; and 3) failed to file the 30 day pre-election report for the November 5, 2024 general election, which was due by October 7, 2024, 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 facts and conclusions of law:

1. The respondent was an unsuccessful candidate for the Laredo, Texas city council, in the November 5, 2024 election. The respondent has also been a member of the United Independent School District ("U.I.S.D.") Board of Trustees since she was elected in 2022.
2. The respondent was a sitting office holder on the U.I.S.D. board of trustees but did not file campaign finance reports with the school district until April 11, 2025. Her campaign treasurer is familiar with the campaign finance requirement in the Tex. Elec. Code.
3. Credible evidence indicates that the respondent did not file her January 2024 or July 2024 semiannual campaign finance reports until April 2025. While the respondent did not have an active campaign treasurer appointment on file during the reporting period for these reports, she reported accepting several thousand dollars in contributions and expenditures on her January 2024 semiannual report. Further, because these final-marked reports were not filed until the following year, they did not effectively terminate her campaign treasurer appointment until then. *See* Tex. Elec. Code § 254.065. There is therefore credible evidence of violations of Section 254.063 of the Election Code for the respondent's failure to timely file her January 2024 and July 2024 semiannual reports.
4. Credible evidence also shows that the respondent did not timely file a 30-day or 8-day pre-election campaign finance report for the November 5, 2024 election. The respondent accepted political contributions and made political expenditures during the pre-election reporting periods, but did not make a timely filing of these records until November 5, 2024. Therefore, there is credible evidence of violations of Section 254.064 of the Election Code.

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 this 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 resolution to the Commissioners outside of the respondent's presence.
3. The respondent acknowledges that a candidate who has an opponent whose name is to appear on the ballot must file a pre-election campaign finance report not later than the 30th day before election day, and a second pre-election campaign finance report not later than the eighth day before election day, as well as two semi-annual reports every year, in compliance with requirements under Sections 254.063 and 254.064 of the Election Code.

4. The respondent agrees to fully and strictly comply with the above requirements 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 Violations

According to the late-filed pre-election reports, the respondent's undisclosed contributions and expenditures in connection with the 2024 election were substantial. This activity was not reported to the public until the reports were finally filed on Election Day. This did significant harm to public 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

The respondent cooperated with enforcement staff and filed late reports as requested. Further, there is no indication that the violations were intentional or that the respondent intended to conceal any activity.

Factor 4: The Penalty Necessary to Deter Future Violations

Given the amount of unreported activity, a penalty is necessary to deter future reporting violations by the respondent.

Factor 5: Any Other Matters that Justice May Require

None.

Conclusion

After considering these factors, the TEC imposes a \$1,000 civil penalty. If the respondent does not pay the \$1,000 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 civil penalty and the additional \$2,500 civil 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-32410568.

AGREED to by the respondent on this 30 day of May, 2025.

Michelle Molina
Michelle Molina, Respondent

EXECUTED by the TEC on: 9-18-25.

Texas Ethics Commission

By: James Tinley
Executive Director