

# TEXAS ETHICS COMMISSION

IN THE MATTER OF

WILLIAM RYAN BRANNAN,

RESPONDENT

**RECEIVED**

**JULY 9 2025**

**Texas Ethics Commission**

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BEFORE THE

TEXAS ETHICS COMMISSION

SC-3250378

## ORDER and AGREED RESOLUTION

### I. Recitals

The Texas Ethics Commission (TEC) met on September 17, 2025, to consider sworn complaint SC-3250378. 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.

To resolve and settle this complaint without further proceedings, the TEC adopted this resolution imposing a \$500 civil penalty. If the respondent does not pay the \$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 alleges that as treasurer of the “Save Lost Creek PAC” political committee, (the GPAC), the respondent failed to report contributions that the GPAC accepted from a related SPAC, and failed to report campaign expenditures for mass emailing, in violation of Section 254.031 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 is the treasurer of a general-purpose political committee called “Save Lost Creek PAC” (“the GPAC”). The respondent was also the treasurer of its predecessor committee, a specific-purpose political committee also called “Save Lost Creek PAC” (“the SPAC”). In September 2024, the respondent dissolved the SPAC and established the GPAC. However, he failed to report the transferred SPAC bank account as a contribution to the newly formed GPAC. He also failed to report small campaign expenditures for mass emails. However, the respondent filed corrections, and there is no evidence of any intent to mislead voters or evade disclosure.

2. Credible evidence indicates that the respondent failed to properly report political contributions accepted and political expenditures made on the GPAC's reports. Therefore, there is credible evidence of violations of Section 254.031 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 treasurer must report political expenditures, and that if the expenditures do not exceed the itemized reporting threshold, they must be included in total unitemized expenditures. The respondent also acknowledges that a political committee's disposition of its funds to a successor committee must be reported by the successor committee as a political contribution.
4. The respondent agrees to fully and strictly comply with the above requirements of law.

#### **V. Confidentiality**

This order and agreed resolution describe 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. Triple the amount at issue is approximately \$4,200. Tex. Gov't Code § 571.173. The TEC shall consider the below factors in assessing a sanction:

##### *Factor 1: The Seriousness of the Violations*

The respondent failed to report a significant contribution from the SPAC to the GPAC. However, the public might have inferred what happened from the closure of the SPAC and the launch of the GPAC with the same amount of funds that the SPAC had left.

##### *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 corrected reports on behalf of the GPAC.

*Factor 4: The Penalty Necessary to Deter Future Violations*

Imposition of a penalty is necessary to ensure that the respondent and future filers treat seriously transfers of funds in connection with the closing and replacement of a political committee.

*Factor 5: Any Other Matters that Justice May Require*

There is no evidence that the violations were intentional or that the respondent intended to conceal activity.


*Conclusion*

After considering the factors, the TEC imposes a \$500 civil penalty. If the respondent does not pay the \$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.

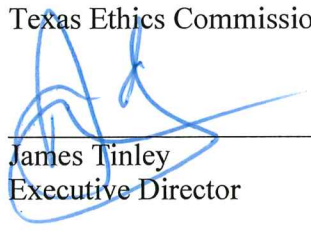
**VII. Order**

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-3250378.

AGREED to by the respondent on this 9th day of July, 2025.

  
William Ryan Brannan, Respondent

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

Texas Ethics Commission  
By:   
James Tinley  
Executive Director