

TEXAS ETHICS COMMISSION

IN THE MATTER OF
CRYSTAL MANCILLA,
RESPONDENT

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BEFORE THE
TEXAS ETHICS COMMISSION
SC-32504128

RECEIVED
SEPT 17 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-32504128. A quorum of the TEC was present. The TEC determined that there is credible evidence of violations of Sections 254.031, 254.063, and 254.064 of the Election Code, laws administered and enforced by the TEC.

To resolve and settle this complaint without further proceedings, the TEC proposed this resolution to the respondent. This proposed resolution imposes a \$250 civil penalty. If the respondent does not pay the 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 timely file her 30-day pre-election report in connection with her candidacy for mayor in the May 4, 2024 special election, in violation of Section 254.064 of the Election Code; 2) did not disclose on her 30-day pre-election report the addresses of persons from whom she accepted political contributions, in violation of Section 254.031 of the Election Code; 3) failed to file a July 2024 semiannual report, in violation of Section 254.063 of the Election Code; 4) did not disclose on her January 2025 semiannual report the full name and address of the persons from whom she accepted political contributions, in violation of Section 254.031 of the Election Code; 5) accepted political contributions in cash that exceeded \$100 during the January 2025 semiannual reporting period, in violation of Section 253.033 of the Election Code; and 6) failed to file a 30-day pre-election report in connection with her candidacy for mayor in the May 3, 2025 election, 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 fact and conclusions of law:

1. The respondent was a successful candidate for mayor in Liberty Hill, Texas, in the May 4, 2024 special election. The respondent was a successful incumbent candidate for mayor in Liberty Hill, Texas, in the May 3, 2025 election.
2. Concerning the 30-day pre-election report for the May 4, 2024 special election, there is credible evidence of violations of Sections 254.064 and 254.031 of the Election Code. The 30-day pre-election report was due on April 4, 2024, but the respondent did not file the report until April 19, 2024. The report disclosed \$9,455.58 in total political contributions and \$4,742.75 in total political expenditures. The respondent filed an amended 30-day pre-election report on September 3, 2025.
3. There is credible evidence of a violation of Section 254.063 of the Election Code because the respondent failed to file the July 2024 semiannual report. The respondent filed the July 2024 semiannual report on September 3, 2025, which disclosed \$7,163.60 in total political contributions and \$4,801.62 in total political expenditures. The July 2024 semiannual report included four contributions that were previously disclosed on the January 2025 semiannual report.
4. There is credible evidence of a violation of Section 254.064 of the Election Code for failing to file a 30-day pre-election report in connection with the May 3, 2025 election. The 30-day pre-election report was due on April 3, 2025, but the respondent did not file the report until April 23, 2025. The report disclosed \$3,100 in total political contributions and \$1,840.25 in total political expenditures.
5. Concerning the January 2025 semiannual report and the respondent's failure to disclose the full name and address of the persons from whom she accepted political contributions, there is no credible evidence of a violation of Section 254.031 of the Election Code. The contributions at issue in the January 2025 semiannual report were properly disclosed on the respondent's July 2024 semiannual report.
6. There is no credible evidence of a violation of Section 253.033 of the Election Code because the respondent did not accept cash in excess of \$100 during the January 2025 semiannual reporting period. The respondent provided documentation from her bank stating that the \$2,500 amount at issue was actually a check that had "cash" written on the line for the deposit slip.

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. The respondent consents to enforcement staff presenting this resolution to the Commissioners outside of the respondent's presence.

3. The respondent acknowledges the campaign finance report filing deadlines and requirements under Sections 254.031, 254.063, and 254.064 of the Election Code. The respondent agrees to fully and strictly comply with these 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 Violation

The respondent failed to file her reports at issue in a timely manner and failed to disclose the addresses of contributors on her 30-day pre-election report for the May 2024 special election and the name and address of the contributors on her January 2025 semiannual report. Specifically, the respondent initially disclosed on her January 2025 semiannual report that she accepted \$4,000 in political contributions, but failed to disclose the identities of the three individuals who made the contributions. The late-filed July 2024 semiannual report included the three contributions that were previously disclosed on the January 2025 semiannual report, which revealed that the individuals were each employed by companies involved in the real estate sector. Given that Liberty Hill has been experiencing a real estate development surge, the respondent's late filing of the July 2024 semiannual report affected the public's knowledge of who actually contributed to her campaign.

Factor 2: The History and Extent of Previous Violations

The TEC has found no previous violations by the respondent.

Factor 3: The Demonstrated Good Faith of the Violator

The respondent made corrections to the reports at issue and filed the reports with the city secretary.

Factor 4: The Penalty Necessary to Deter Future Violations

Liberty Hill has been experiencing a real estate development surge and many individuals involved in the real estate sector will likely make political contributions to city officials to build relationships and offer financial support. However, in order to promote public transparency, it is important for city officials to properly disclose the name and address of the individuals who make the contributions. Despite the respondent disclosing the total amount she accepted in contributions, she was still required to properly disclose the name and address of the individuals who made the contributions. A penalty is therefore necessary in order to ensure that the respondent fully complies with the campaign finance reporting requirements.

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 \$250 civil penalty. If the respondent does not pay the \$250 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-32504128.

AGREED to by the respondent on this 16 day of Sept., 2025.


Crystal Mancilla, Respondent

EXECUTED by the TEC on this date: 9-18-25

Texas Ethics Commission

By:


James Tinley, Executive Director