

# TEXAS ETHICS COMMISSION

IN THE MATTER OF  
ROBERT EISSLER,  
RESPONDENT

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BEFORE THE  
TEXAS ETHICS COMMISSION  
SC-32505201

**RECEIVED**  
**JUNE 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-32505201, which was filed on May 1, 2025. A quorum of the TEC was present. The TEC determined that there is credible evidence of violations of Sections 254.031 and 254.124 of the Election Code.

To resolve and settle this complaint without further proceedings, the TEC adopted this resolution imposing a \$7,500 civil penalty. If the penalty is not paid in full within 30 days of the date of this Order and Agreed Resolution, 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 as the treasurer of the Montgomery County in Motion specific-purpose political committee (the SPAC), the respondent: 1) failed to timely file the SPAC's 30-day pre-election report, in violation of Section 254.124 of the Election Code; 2) failed to file, or timely file, the SPAC's 8-day pre-election report, in violation of Section 254.124 of the Election Code; 3) failed to include required information for political contributors in the SPAC's 30-day pre-election report, in violation of Section 254.031 of the Election Code; and 4) failed to individually report the SPAC's political expenditures on its 30-day pre-election report, 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 fact and conclusions of law:

1. The respondent was campaign treasurer of the Montgomery County in Motion specific-purpose political committee ("the SPAC"), which was formed to support a Montgomery County road bond measure in the May 3, 2025 election. The measure passed.
2. The respondent filed the SPAC's 30-day pre-election report one day late, on April 4, 2025. He filed the SPAC's 8-day pre-election report three days late, on April 28, 2025. There is therefore credible evidence of violations of Section 254.124 of the Election Code as to these reports.
3. On the SPAC's 30-day report, the respondent failed to include the full name of two contributors, and failed to include the address of one contributor. Both contributions exceeded the itemized reporting threshold. There is therefore credible evidence of violations of Section 254.031 of the Election Code as to these contributions.
4. The respondent also failed to individually report the SPAC's expenditures on the SPAC's original 30-day and 8-day pre-election reports. The respondent filed corrected reports identifying the individual expenditures on May 2, 2025, the day before election day. Because the TEC did not accept jurisdiction over the complaint until May 6, 2025, the TEC must dismiss these allegations. *See* Tex. Gov't Code § 571.1223.

#### **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 TEC staff presenting this Order and Agreed Resolution to the Commissioners outside of the respondent's presence.
3. The respondent acknowledges that each campaign finance report must individually disclose each political expenditure that exceeds the itemized reporting threshold, which is currently \$220. The respondent agrees to file all pre-election campaign finance reports he owes as treasurer or candidate by the statutory deadline.

#### **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 following factors in assessing a sanction: 1) the seriousness of the violation, including the nature, circumstances, consequences, extent, and gravity of the violation; 2) the history and extent of previous violations; 3) the demonstrated good faith of the violator, including actions taken to rectify the consequences of the violation; 4) the penalty necessary to deter future violations; and 5) any other matters that justice may require. Tex. Gov't Code § 571.177.

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

The respondent did not individually report the SPAC's expenditures until the day before election day. These expenditures were substantial, and so the disclosure violations are significant.

### *Factor 2: The History and Extent of Previous Violations*

The TEC has found violations by the respondent in two prior sworn complaint orders, in 2007 and 2012. *See in re Eissler*, SC-2611238, SC-2611243, SC-2765113, and SC-2709200 (Feb. 12, 2008); *In re Eissler*, SC-3110227 (Nov. 29, 2012). In one of the orders, the TEC imposed a \$10,600 civil penalty and ordered the respondent to reimburse his campaign \$18,106.53 for misuse of campaign funds.

### *Factor 3: The Demonstrated Good Faith of the Violator*

There is no evidence that the reporting violations were intentional. The respondent acted quickly to correct the reporting issues after the complaint was filed.

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

The circumstances do not suggest intent to conceal activity. The respondent has prior violations, but none in the last ten years. A moderate penalty, relative to the amount of activity at issue, is enough to deter future violations.

### *Factor 5: Any Other Matters That Justice May Require*

The first four factors consider all the relevant concerns.

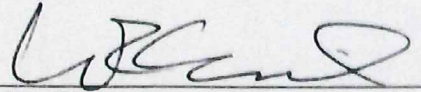
### *Conclusion*

After considering the factors prescribed by Section 571.177 of the Government Code, the TEC imposes a \$7,500 civil penalty. If the penalty is not paid in full within 30 days of the date of this Order and Agreed Resolution, 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-32505201.

AGREED to by the respondent on this 17<sup>th</sup> day of June, 2025.

  
Robert Eissler, Respondent

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

Texas Ethics Commission

By:

  
Executive Director