

SWORN COMPLAINT BEFORE THE TEXAS ETHICS COMMISSION

Section 571.122 of the Government Code requires that a sworn complaint be filed on a form prescribed by the Texas Ethics Commission and include specific information.

- You must complete a separate sworn complaint form for each respondent.
- You must allege a violation of a law that is within the Texas Ethics Commission's jurisdiction, listed on p. 2. More information and instructions for this form can be found at <https://www.ethics.state.tx.us/tec/sworn.html>.
- A person filing a frivolous or bad faith complaint may be subject to a civil penalty.

OFFICE USE ONLY

Docket Number

Date Hand-delivered or Date Postmarked

Please completely fill out this form.

Failure to complete this form properly will cause your complaint to be noncompliant and returned.

I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	NICKNAME	LAST	SUFFIX
Gardner Pate			
2 COMPLAINANT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #	CITY STATE ZIP CODE
	(Full home or business address, including street, city, state, and zip code)		
3 COMPLAINANT MAILING ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #	CITY STATE ZIP CODE
	(Full street or mailing address, including city, state, and zip code)		
PO Box 308, Austin, TX 78767			
4 COMPLAINANT TELEPHONE NUMBER (REQUIRED)	AREA CODE	PHONE NUMBER	EXT
	(512) 477-2002		
5 COMPLAINANT E-MAIL ADDRESS (REQUIRED IF KNOWN)			
[REDACTED]			

II. IDENTITY OF RESPONDENT

6 RESPONDENT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	NICKNAME	LAST	SUFFIX
Gwen Pulido			
7 RESPONDENT POSITION OR TITLE (REQUIRED)	Treasurer, Beto for Texas		
8 RESPONDENT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #	CITY STATE ZIP CODE
	(Full home or business address, including street, city, state, and zip code)		
304 Texas Ave, Suite 1503, Box 126, El Paso, TX 79901			
9 RESPONDENT MAILING ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #	CITY STATE ZIP CODE
	(Full street or mailing address, including city, state, and zip code)		
PO Box 302647, Austin TX 78703			
10 RESPONDENT TELEPHONE NUMBER (REQUIRED)	AREA CODE	PHONE NUMBER	EXT
	(512) 200-3297		
11 RESPONDENT E-MAIL ADDRESS (REQUIRED IF KNOWN) (If unknown, please state that)			
[REDACTED]			

GO TO PAGE 2

III. NATURE OF ALLEGED VIOLATION

Page 2

Include the specific law(s) or rule(s) alleged to have been violated. YOU MUST ALLEGE A VIOLATION OF A LAW THAT IS WITHIN THE COMMISSION'S JURISDICTION. The Texas Ethics Commission has jurisdiction to enforce only the following laws: (1) Title 15 of the Election Code; (2) Chapters 302, 303, 305, 572 and 2004 of the Gov't Code; (3) § 334.025 and § 335.055 of the Local Gov't Code; (4) Chapter 159 of the Local Gov't Code, in connection with a county judicial officer who elects to file a financial statement with the commission; and (5) § 2152.064 and § 2155.003 of the Gov't Code.

*Please completely fill out this form.
Failure to complete this form properly will cause your complaint to be noncompliant and returned.*

Mrs. Pulido is the treasurer of Beto for Texas, a Texas specific-purpose committee.

Texas law defines political advertising, in part, as a communication supporting a candidate for nomination or election to public office that appears on an Internet website (Election Code 251.001(16)). Texas law requires political committees to display the political advertising disclaimer on political advertising (Election Code 255.001). There is no exception to the required political advertising disclaimer on a political committee's website. (Ethics Commission Rule 26.1(c), which provides exceptions to the required political advertising disclaimer, does not apply to a candidate for public office)

On information and belief, Beto for Texas operates the website www.betoorourke.com. This is based on an email originating from info@betoorourke.com which concludes with the disclaimer "Pol. Adv. Paid for by Beto for Texas". This campaign website, which includes information about Mr. O'Rourke's campaign, requests contributions, and provides information about him as a candidate does NOT include the required political advertising disclaimer, in violation of law.

ATTACH ADDITIONAL PAGES AS NEEDED

IV. STATEMENT OF FACTS

You must state the facts constituting the alleged violation(s), including the dates on which or the period of time in which the alleged violation(s) occurred. Identify allegations of fact not personally known to you, but alleged on information and belief. Use simple, concise, and direct statements. You must state facts that, if true, would constitute a violation of a law within the Commission's jurisdiction and allege facts to sufficiently indicate the manner and means by which each alleged violation occurred.

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ATTACH ADDITIONAL PAGES AS NEEDED

V. LISTING OF DOCUMENTS AND OTHER MATERIALS

You must list all documents and other materials filed with this complaint. Additionally, list all other documents and other materials that are relevant to this complaint and that are within your knowledge, including their location, if known. Relevant documents that are available to you or in your possession must be included.

Please completely fill out this form.

Failure to complete this form properly will cause your complaint to be noncompliant and returned.

Printout of www.betoorourke.com

Printout of email from info@betoorourke.com

ATTACH ADDITIONAL PAGES AS NEEDED

VII. AFFIDAVIT BASED ON INFORMATION AND BELIEF

(Execute this affidavit if the acts alleged are not within your direct personal knowledge, but are based on reasonable belief.)

Please completely fill out this form.

Failure to complete this form properly will cause your complaint to be noncompliant and returned.

Gardner Pate

I, _____, complainant, swear that I am a resident of the state of Texas. I swear that I have reason to believe and do believe that the violation alleged in this complaint has occurred. The source of my information and belief is (state below):

An email originating from the domain betoorourke.com with

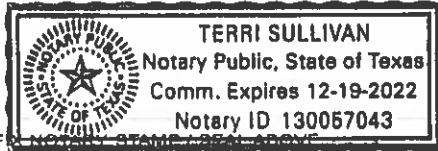
a disclaimer "Pol. Adv. Paid for by Beto for Texas"

Handwritten signature of Gardner Pate

Signature of Complainant (Declarant)

NEW: Please complete EITHER the Notary section OR the Unsworn Declaration section.

NOTARY SECTION



AFFIX NOTARY STAMP/SEAL ABOVE

Sworn to and subscribed before me, by the said Gardner Pate, this the 15 day of

(Complainant)

November 20 21, to certify which, witness my hand and seal of office.

Handwritten signature of Terri Sullivan

Signature of officer administering oath

TERRI SULLIVAN

Printed name of officer administering oath

NOTARY PUBLIC, STATE OF TEXAS

Title of officer administering oath

OR

UNSWORN DECLARATION SECTION

My name is _____, and my date of birth is _____.

My Address is _____ (street), _____ (city), _____ (state), _____ (zip code), _____ (country)

Executed in _____ County, State of _____, on the _____ day of _____, 20_____.

Signature of Complainant (Declarant)



INVEST IN A BIGGER, BOLDER TEXAS

Beto is running for governor to serve all of the people of Texas. Support the work it will take to make it happen here.

\$5	\$10
\$25	\$100
\$250	OTHER AMOUNT

If you're over 18 you can help determine how much you want to donate. You'll receive a receipt through email.

ENLARGE



- ABOUT BETO
- VOLUNTEER
- EVENTS
- JOB
- DONATE**

IT'S GONNA TAKE ALL OF US

JOIN OUR CAMPAIGN

EMAIL ADDRESS ZIP CODE

MOBILE NUMBER

Join a team of volunteers to help us get out there. Beto is a big campaign, and we need you to help us win. We're looking for people who are passionate about Texas and want to make a difference. If you're interested, please contact us at info@betofortexas.com or call 1-800-444-4444. We'll be in touch with you soon.

SIGN UP

BETO O'ROURKE IS A FOURTH-GENERATION TEXAN

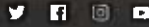
Beto O'Rourke is a fourth-generation Texan, born and raised in El Paso where he has served as a small business owner, city council representative, and a member of Congress.

[READ MORE](#)



THE LATEST FROM BETO

CONNECT WITH US:



HAD A CHANCE TO MEET WITH JUDGE JOAN CARLS IN HENDERSONVILLE (JIM HOGG COUNTY).

SAVY WE'RE LOOKING FOR A PARTNER TO HELP OVERHAUL THE COUNTY'S DANGER WATER PIPES, TO IMPROVE THE COUNTY ROADS, AND TO GET A LOT SMARTER ON ADDRESSING IMMIGRATION AT THE BORDER.

BETO O'CONNOR
@BETOCONNOR · 2H AGO

WHILE CAR COMPANY CEOs STAY WARM WITH THE \$10 THEY MADE IN ONE WEEK DURING THE POWER GRID FAILURE, ABBOTT HAS DONE NOTHING TO ENSURE TEXANS DON'T FREEZE TO DEATH AGAIN IN THEIR HOMES THIS WINTER.

THIS IS WHAT HAPPENS WHEN INDUSTRY OWNS POLITICIANS.

INDUSTRIALWORKERS.COM/ABBOTTSCASTS/...

BETO O'CONNOR
@BETOCONNOR · 2H AGO

LOTS OF LOVE IN LAREDO LAST NIGHT. THANK YOU!

BETO O'CONNOR
@BETOCONNOR · 2H AGO

LAREDO TWITTER.COM/ABBOTTSCASTS/...

BETO O'CONNOR
@BETOCONNOR · 2H AGO

SEE YOU IN A FEW HOURS, LAREDO!

THERE'S STILL TIME TO SIGN UP TO JOIN US TOMORROW AT 6PM! MOBILE.ZENITHMEDIA.COM

BETO O'CONNOR
@BETOCONNOR · 22H AGO

TEXANS EXPECT THOSE IN POSITIONS OF PUBLIC TRUST TO LISTEN, SERVE, AND PARTNER WITH THEM TO PURSUE COMMON-SENSE GOALS THAT BENEFIT THEIR COMMUNITIES.

GREAT CONVERSATION IN FORT STOCKTON TODAY ABOUT STEPS WE CAN TAKE TO EXPAND HEALTH CARE AND DOUBT RURAL ECONOMIES.

BETO O'CONNOR
@BETOCONNOR · YESTERDAY

ESSENTIAL WORKERS AND LARGO LEADERS IN SAN ANTONIO TWITTER.COM/ABBOTTSCASTS/...

BETO O'CONNOR
@BETOCONNOR · YESTERDAY

A GREAT FIRST DAY ON THE ROAD LISTENING TO TEXANS ABOUT HOW WE CAN MOVE THIS STATE FORWARD TOGETHER.

THIS IS A CAMPAIGN BY THE PEOPLE OF TEXAS, FOR THE PEOPLE OF TEXAS. HELP US CONTINUE TO CONNECT WITH FOLKS ACROSS THE STATE! @BETOCONNOR

BETO O'CONNOR
@BETOCONNOR · YESTERDAY

BEAUTIFUL DAY IN SAN ANTONIO!

MET WITH THE ESSENTIAL WORKERS WHO TEACH OUR KIDS, KEEP US HEALTHY, POWER OUR CITIES - AND KEEP OUR STATE RUNNING THROUGH THE PANDEMIC. THEN HAD A CHANCE TO REUNITE WITH THE PEOPLE OF THIS GREAT CITY IN THE HEART OF DOWNTOWN SA. SEE YOU AGAIN SOON!

BETO O'CONNOR
@BETOCONNOR · YESTERDAY

I LOVE YOU, SAN ANTONIO! TWITTER.COM/ABBOTTSCASTS/...

BETO O'CONNOR
@BETOCONNOR · YESTERDAY

TEXAS CAN LEAD THE NATION IN CREATING THE NEXT GENERATION OF HIGH-QUALITY JOBS. WE CAN HAVE WORLD-CLASS SCHOOLS AND EXPAND HEALTHCARE ACCESS TO GUARANTEE THAT EVERY TEXAN IS WELL ENOUGH TO PURSUE A QUALITY EDUCATION AND AMBITIOUS CAREER.

JOIN OUR EFFORT! @BETOCONNOR.COM

BETO O'CONNOR
@BETOCONNOR · NOV 15

ON THE ROAD TO LISTEN TO AND LEARN FROM THE PEOPLE WHO ARE LEADING THE EFFORT TO GET OUR STATE BACK ON TRACK.

EDUCATORS, FRONTLINE WORKERS, ENTREPRENEURS, ENERGY LEADERS - ALL THOSE WHO'VE STEPPED UP FOR TEXAS IN THE ABSENCE OF STATE LEADERSHIP. LOOKING FORWARD TO SEEING YOU.

BETO O'CONNOR
@BETOCONNOR · NOV 15

A GREAT FIRST DAY ON THE ROAD LISTENING TO TEXANS ABOUT HOW WE CAN MOVE THIS STATE FORWARD TOGETHER.

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BETO O'CONNOR
@BETOCONNOR · YESTERDAY

IF YOU'LL BE IN OR NEAR SAN ANTONIO, LAREDO, McALLEN, CORPUS CHRISTI, HOUSTON, DALLAS, OR ARLING THIS WEEK - I WANT TO SEE YOU, AND BRING YOU INTO THIS CAMPAIGN!

SIGN UP TO JOIN US AT AN EVENT NEAR YOU: MOBILE.ZENITHMEDIA.COM/TEXAS

BETO O'CONNOR
@BETOCONNOR · NOV 15

TEXAS LEADS THE NATION IN THE NUMBER OF PEOPLE WHO CAN'T AFFORD TO SEE A DOCTOR.

GRATEFUL TO BE IN FORT STOCKTON TO LEARN FROM LOCAL LEADERS, DOCTORS AND HOSPITAL ADMINISTRATORS TO DISCUSS MEDICAID EXPANSION AND OTHER URGENT STEPS NEEDED TO EXPAND HEALTHCARE ACCESS IN TEXAS.

BETO O'CONNOR
@BETOCONNOR · NOV 15

I'M RUNNING FOR GOVERNOR.

TOGETHER, WE CAN PUSH PAST THE SMALL AND DIVISIVE POLITICS THAT WE SEE IN TEXAS TODAY - AND GET BACK TO THE BIG, BOLD IDEAS THAT USED TO DEFINE TEXAS. A TEXAS BIG ENOUGH FOR ALL. BY BEL. JOIN US @BETOCONNOR

BETO O'CONNOR
@BETOCONNOR · NOV 15

SHOW MORE

JOIN OUR TEAM

Sign up here to get the latest information on the campaign, the next time Beto will be in your town and how to get involved in your community.

FIRST NAME	LAST NAME
EMAIL ADDRESS	ZIP CODE
MOBILE NUMBER	

Enter your email address in the box above, and we'll email you the next time we're in your town. We'll also keep you up to date on the campaign. We'll never give your information to anyone else. Beto O'Connell is not affiliated with the Texas Democratic Party. Message to state and county officials. Message to state and county officials. Message to state and county officials. Message to state and county officials.

SIGN ME UP

CHIP IN TODAY

We can't do this without your support!

\$5

\$10

\$25

\$100

\$250





OTHER AMOUNT

If you've saved your payment information with ActBlue Express, your donation will go through immediately.

BETO
FOR TEXAS

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DONATE BY MAIL
FundRazr, Texas
PO Box 304647
Austin, TX 78703

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Beto O'Rourke is a fourth-generation Texan, born and raised in El Paso where he has served as a small business owner, a city council representative and a member of Congress. He founded and currently leads Powered by People, a Texas-based organization that works to expand democracy and produce Democratic victories through voter registration and direct voter engagement. Powered by People has helped register over 250,000 unregistered Texans to vote since its inception in December 2019.

Beto is married to Amy O'Rourke and together they are raising Ulysses, Molly and Henry in El Paso's historic Sunset Heights.



POWERED BY PEOPLE



JOIN OUR TEAM

Sign up here to get the latest information on the campaign, the next time Beto will be in your town and how to get involved in your community.

FIRST NAME	LAST NAME
EMAIL ADDRESS*	ZIP CODE*
MOBILE NUMBER	

Enter your phone number above to join our team. By clicking sign up, you agree to the terms & privacy policy for recurring campaign messages from Beto O'Rourke and Beto for Texas (including donations). Message & data rates may apply. Message frequency varies. Text HELP for help, text STOP to Opt Out.

SIGN ME UP

CHIP IN TODAY

We can't do this without your support!

\$5

\$10

\$25

\$100

\$250

OTHER AMOUNT

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Beto for Texas

PO Box 302647

Austin, TX 78703

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Made with Middle Seat

This site is registered on wpml.org as a development site.

From: Beto O'Rourke <info@betoorourke.com>
Date: November 15, 2021 at 8:04:57 AM CST
To: [REDACTED]
Subject: I'm running
Reply-To: Beto O'Rourke <info@betoorourke.com>

Let's get back to being
big.

I am running for governor to serve ALL of the people of Texas.

I believe that the only way we are going to achieve great things for this state is by looking out for each other and moving forward together.

[Donate now to support my campaign »](#)

Whether it was building a successful technology business in my hometown or working with my fellow El Pasoans on the City Council or passing legislation in a divided Congress to improve mental healthcare for veterans, these experiences have taught me that we are most successful when we keep the focus on people.

When we listen to and learn from each other — regardless of our differences — we build trust, and that trust allows us to do together what none of us could do on our own.

The fringe policies and incompetence that we see in Texas today — on masks, on abortion, on guns, on schools, on the electricity grid — are symptoms of a larger problem. Our leaders have stopped listening to the people they were elected to serve. They don't trust Texans and so they aren't able to move forward on what the people of Texas want, like better jobs and safe communities.

Instead, they're focused on the agendas of their donors, on positioning themselves for the next election, on catering to the loudest voices in their party and on keeping themselves in power regardless of the cost to the rest of us.

It's a small vision for such a big state. And it's hurting the people of Texas.

We could be leading the world in creating the next generation of energy jobs instead of praying the electricity grid won't collapse again this winter.

We could expand Medicaid and ensure that every one of us is healthy enough to pursue our education and career instead of leading the nation in the number of people unable to see a doctor.

We could follow the guidance from our own world-class scientists and healthcare professionals to protect vulnerable Texans instead of allowing politics to determine our response to the pandemic. More than 70,000 Texans have died of Covid on this Governor's watch.

We are losing the big, bold vision that used to define Texas, a Texas big enough for all of us. Big enough for our dreams and big enough to make them happen. We've been offered something small, mean and uninspiring in its place.

But it doesn't have to be this way.

We can do better.

Donate now »

When I ran for Senate in 2018, I traveled to every county of Texas. I met a lot of people, and had the chance to listen to and learn from them. How they lived, what they cared about, what kept them up at night, what they dreamed for their kids and grandkids. It turns out that in most communities, people have thought through the solutions to the challenges before them. They don't need someone to tell them what's best for them, they just need someone to listen and then take action.

Something else I picked up, and it's stayed with me ever since, is that it's impossible to write someone off, to take them for granted, to forget them once you've had the chance to meet them and understand where they're coming from. I've got a strong hunch that if we took the time to listen more and learn from each other, there's a whole lot more we could get done, in our lives, in our communities, and in our state.

I didn't win that race, or the next one (not even close). But I stayed with it, kept working to help the people I'd met, the communities I'd been to. In the face of so much that could cause despair — like the unprecedented attack on voting rights or the failure of the electricity grid — I found hope and purpose in the people with whom I volunteered for the last two years in an organization called Powered by People.

We worked to bring people into our elections and the political process. Together we

helped register more than 250,000 new voters. We organized our fellow Texans to defend our democracy in the halls of the state capitol when free and fair elections were under attack. And then we went beyond the capitol to counties like Rains and Midland, Harris and Dallas, Bowie and Jefferson, bringing as many people of this state into the conversation as we could — Republicans and Democrats alike — to listen to each other and try to find common ground on the right to vote.

And when the lights went out, the heater wouldn't turn on and the water stopped running for millions of Texans in February, together we organized thousands of volunteers to make over a million phone calls to stranded Texas seniors — connecting them with food, water, warmth and the knowledge that another human being cared about them and wanted to make sure they were OK.

Our volunteers raised over a million dollars to help those whose homes had been damaged in the disaster. Their governor might fail them, but the people of Texas wouldn't.

That's what happens when people are moved to come together to help their neighbors and fellow Texans. Imagine if we had a governor who felt the same way.

It's up to us to make it happen.

And get back to being big again.

I hope you'll join us and make a donation to become one of our first grassroots donors. Your support today will make a big difference in the success of this campaign.

Donate now »

I look forward to working with you for ALL of Texas,

Beto



Donate

Email us: info@betofortexas.com

This email was sent to [REDACTED] Grassroots supporters like you keep us going.
To contribute via check, please address to Beto for Texas, PO Box 302647, Austin, TX 78703.

-

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Pol. Adv. Paid for by Beto for Texas.