

TEXAS ETHICS COMMISSION

P.O. Box 12070, Capitol Station
Austin, Texas 78711-2070

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January 27, 2022

Ms. Gwendolyn "Gwen" Pulido

SENT BY EMAIL

Re: Notice of Complaint, SC-3220127

Dear Ms. Pulido:

We received sworn complaint SC-3220127 on January 24, 2022. The complaint meets the legal and technical form requirements for a complaint filed with the Texas Ethics Commission (Commission), and the executive director has determined that the Commission has jurisdiction over the matters alleged in the sworn complaint.

The sworn complaint alleges that, as campaign treasurer of the "Beto for Texas" political committee, concerning transactions that you disclosed as both in-kind contributions and political expenditures on the political committee's campaign finance report due by January 18, 2022,¹ you: 1) failed to properly report in-kind political contributions accepted, in violation of Section 254.031(a)(1) of the Election Code; 2) failed to properly report political expenditures made, in violation of Section 254.031(a)(3) of the Election Code; and 3) failed to properly report the total amount of all political contributions accepted and the total amount of all political expenditures made during the reporting period, in violation of Section 254.031(a)(6) of the Election Code. **The Commission accepts jurisdiction over these allegations.**

The sworn complaint allegations will be processed as Category One violations. Under the law you are required to respond to the allegations not later than 10 business days from the date you receive this notice. Failure to respond will constitute a separate violation for which a separate civil penalty may be assessed.

The response must be in writing, admit or deny the allegations, and be signed by you. If you deny the allegations, then you should provide evidence supporting the denial. The response must include any challenge you seek to raise to the Commission's exercise of jurisdiction. The response should be under oath. We have enclosed an affidavit form that you may wish to use for

¹ The deadline for this report was January 18, 2022, rather than January 15, 2022, due to the extended holiday weekend. Tex. Elec. Code § 254.063(c); 1 Tex. Admin. Code § 6.9(a).

the response. A respondent who is a candidate or officeholder may by writing submitted to the Commission designate an agent with whom the Commission staff may communicate regarding the complaint. If you have any information relevant to the complaint, please provide it at this time. Also, please be advised that you should preserve all documents and evidence related to the allegations in this complaint.

To comply with legal requirements regarding the initial notice of a sworn complaint, I have also included a copy of the sworn complaint, the Commission's sworn complaint rules, a Statement of Respondent's Rights, and a copy of the relevant statutes of the Election Code. More information about the complaint process is available on the Commission's website at www.ethics.state.tx.us.

Please note that at this stage in the process, Commission members and staff are required by law to keep the complaint and all documents relating to it strictly confidential.

Please contact me if you have any questions.

Sincerely,

/s/ Jordan T. Hunn

Jordan T. Hunn
Assistant General Counsel

Jurisdiction accepted
For the Texas Ethics Commission

/s/ Anne Temple Peters

Anne Temple Peters
Executive Director

JTH:mc

Enclosures: Copy of Sworn Complaint
Commission Rules Concerning Sworn Complaints
Statement of Respondent's Rights
Relevant Statutes
Affidavit (for respondent only)

c: Mr. Gardner Pate

SENT BY EMAIL