

TEXAS ETHICS COMMISSION

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

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April 14, 2023

Mr. John Lappe

Re: Notice of Complaint, SC-3230484

Dear Mr. Lappe:

We received sworn complaint SC-3230484 on April 7, 2023. The sworn complaint alleges that you, as campaign treasurer for the general-purpose committee Families for Irving: 1) failed to file a 30-day pre-election report for the May 7, 2022 election, despite being involved in the election in violation of Section 254.154(b) of the Election Code; 2) failed to file an 8-day pre-election report for the May 7, 2022 election, despite being involved in the election in violation of Section 254.154(c) of the Election Code, and 3) failed to file a runoff election report for the June 18, 2022 runoff election, despite being involved in the election in violation of Section 254.154(e) of the Election Code.

The Texas Ethics Commission (Commission) accepts jurisdiction over the allegations. This does not mean that the Commission has found that a violation occurred. It means that the sworn complaint meets the Commission's legal and technical form requirements for accepting jurisdiction.

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 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.

www.ethics.state.tx.us

(512) 463-5800 • TDD (800) 735-2989
Promoting Public Confidence in Government

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 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 call if you have any questions.

Sincerely,

/s/ Natalie McDermon

Natalie McDermon
Assistant General Counsel

Jurisdiction accepted
For the Texas Ethics Commission

J.R. Johnson
Executive Director

NM:mc

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

c: Mr. Benedict Parks

SENT BY EMAIL