



TEXAS ETHICS COMMISSION

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

Tom Harrison
Chair

Ross Fischer
Vice Chair

David A. Reisman
Executive Director

Commissioners

September 10, 2008

Raymond R. "Tripp" Davenport, III
Wilhelmina Delco
Jim Graham
Paula M. Mendoza
David Montagne
Nicholas C. Taylor

Mr. Donnie Dippel
145 W. Travis Street
La Grange, Texas 78945-2620

**CERTIFIED MAIL NO. 7008 0150 0000 7742 1550,
RETURN RECEIPT REQUESTED**

Re: Notice of Complaint, SC-2809318

Dear Mr. Dippel:

We received sworn complaint SC-2809318 on September 8, 2008. The complaint meets the technical form requirements for a complaint filed with the Texas Ethics Commission, and the executive director has determined that the Ethics Commission has jurisdiction over the violation of law alleged in the sworn complaint. The complaint alleges that you failed to properly disclose political contributions and political expenditures in violation of section 254.031 of the Election Code. The complaint also alleges that you failed to properly disclose, and improperly reimbursed, political expenditures made from personal funds in violation of sections 253.035 and 254.031 of the Election Code and Texas Ethics Commission Rule 20.63. The complaint also alleges that you failed to include required information for out-of-state political committees on campaign finance reports in violation of section 253.032 of the Election Code and Texas Ethics Commission Rule 20.29.

With this notice, I have included a copy of the sworn complaint, the Ethics 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 Ethics Commission's website at www.ethics.state.tx.us.

If you have any information relevant to the complaint, please provide it at this time. Your response must be in writing and under oath. We have enclosed an affidavit form that you may wish to use for your response. Your response must include any challenge you seek to raise to the Ethics Commission's jurisdiction. In addition, in your response you may acknowledge the occurrence or commission of the violation, or deny the allegations and provide evidence supporting that denial.

The sworn complaint allegations will be processed as Category One violations. You are required to respond to an allegation of a Category One violation 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.**

Come visit our home page at <http://www.ethics.state.tx.us> on the Internet.

(512) 463-5800 • 1-800-325-8506 • FAX (512) 463-5777 • TDD 1-800-735-2989

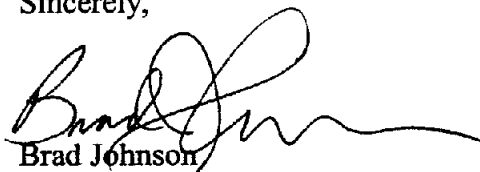
The Texas Ethics Commission does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or the provision of services.

The law requires the commission to mail certain notices relating to a sworn complaint to the respondent and the complainant. The notices are required to be sent by registered or certified mail, restricted delivery, return receipt requested unless the requirement is waived by the respondent or complainant. The enclosed form may be used to submit a waiver.

Please note that at this stage in the process, Ethics Commission members and staff are required by law to keep the complaint and all documents relating to it strictly confidential. However, other persons, including the complainant and respondent named in the complaint, are not bound by this confidentiality requirement.

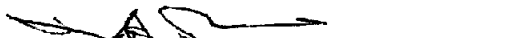
Please call me if you have any questions.

Sincerely,



Brad Johnson
Assistant General Counsel

Jurisdiction accepted
For the Texas Ethics Commission



David A. Reisman
Executive Director

BJ:mc

Enclosures: Copy of Sworn Complaint
Statutes and Rules Concerning Sworn Complaints
Statement of Respondent's Rights
Affidavit
Waiver of Notice

c: Mr. Jim Doyle
16728 Bending Oaks
Conroe, Texas 77385-3600

**CERTIFIED MAIL NO. 7008 0150 0000 7742 1567,
RETURN RECEIPT REQUESTED**

**SWORN COMPLAINT
BEFORE
THE TEXAS ETHICS COMMISSION**

Revised 01/05/2000

Office Use Only
Docket Number

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I. IDENTITY OF COMPLAINANT

I, Jim Doyle, complainant,
(full name of individual filing the complaint)

hereby file this sworn complaint with the Texas Ethics Commission. My address is
16728 Bending Oaks, Conroe, TX 77385
(full mailing or street address, including P.O. box number or street, city, state, and zip code)

My telephone number is 936-321-2976
(telephone number, including area code)

II. IDENTITY OF RESPONDENT

The respondent is Donnie Dippel
(full name of respondent)

The respondent holds the position or title of State Representative
(position or title held by respondent)
District 17

The respondent's address is 145 West Travis
(full mailing or street address, including P.O. box number or street, city, state, and zip code of respondent)
La Grange, TX 78945

The respondent's telephone number is 979-247-4676
(telephone number of respondent, including area code)

Attach additional pages, if necessary.

III. NATURE OF ALLEGED VIOLATION

(Include the specific law or rule alleged to have been violated, if possible. The Texas Ethics Commission has jurisdiction to enforce *only* Chapters 302, 305, and 572 of the Government Code and Title 15 of the Election Code.)

C/OH Campaign Finance Report (30th day) - 2/04/08

1) Reported an incorrect "Contribution Balance". The contribution balance should be at least \$9,607.98, and not \$4,602.38, as reported in violation of Section 254.031(a)(8). Note that the candidate disclosed a contribution balance of \$0.00 in the January 2008 semiannual report.

2) Failed to disclose the payees of expenditures made with personal funds (10 places), in violation of Section 253.035(h).

C/OH Campaign Finance Report (8th day) - 3/13/08

1) Reported an incorrect "Contribution Balance". The contribution balance should be at least \$19,601.80, and not \$7,941.97, as reported, in violation of Section 254.031(a)(8). That is, at least \$11,659.83 is missing. Note that the candidate did not report any interest earned on the contribution balance.

2) Failed to disclose the payees of expenditures made with personal funds (4 places), in violation of Section 253.035(h).

3) Failed to disclose the principal occupation or job title and the full name of employer for political contributions of \$500 or more (5 places), in violation of Section 254.0612.

4) Received a political contribution from an out-of-state political committee (Southern Crop Production Assn. PAC#2, \$499.00) without disclosing the out-of-state PAC ID number.

Attach additional pages, if necessary.

**VI. AFFIDAVIT
BASED ON PERSONAL KNOWLEDGE
(Execute this affidavit if the acts alleged are within your direct personal knowledge.)**

I, _____, complainant,
swear that I have knowledge of the facts alleged in this complaint
and that the information contained in this complaint is true
and correct.

Signature of complainant

AFFIX NOTARY STAMP / SEAL ABOVE

Sworn to and subscribed before me, by the said _____, this
the _____ day of _____, 20 _____, to certify which, witness my hand and seal of office.

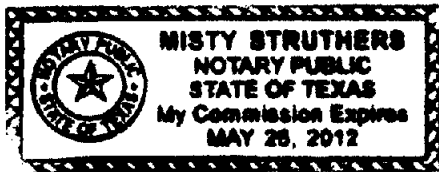
Signature of officer administering oath

Print name of officer administering oath

Title of officer administering oath

**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.)**

I, JAMES DOYLE, complainant,
swear that I have reason to believe and do believe that the violation alleged in
this complaint has occurred. The source and basis of my information and belief
is Campaign Finance Reports.



AFFIX NOTARY STAMP / SEAL ABOVE

James Doyle
Signature of complainant

Sworn to and subscribed before me, by the said James Doyle, this
the 3 day of September, 20 08, to certify which, witness my hand and seal of office.

Misty Struthers Misty Struthers Customer Service Rep.
Signature of officer administering oath Print name of officer administering oath Title of officer administering oath