



TEXAS ETHICS COMMISSION

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

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November 13, 2009

The Honorable Valinda Bolton
State Representative
6414 Ira Ingram Drive
Austin, Texas 78749-1852

**CERTIFIED MAIL NO. 7007 1490 0004 9890.7438,
RETURN RECEIPT REQUESTED**

Re: Notice of Complaint, SC-2911285

Dear Representative Bolton:

We received sworn complaint SC-2911285 on November 9, 2009. 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: 1) accepted political contributions from corporations in violation of sections 253.003 and 253.094 of the Election Code, 2) failed to include required information in campaign finance reports about political contributions accepted from out-of-state political committees in violation of section 253.032 of the Election Code and section 20.29 of the Ethics Commission Rules, 3) failed to properly disclose political contributions and political expenditures, including the full names of persons making political contributions and the full names of payees receiving political expenditures, in violation of sections 254.031(a)(1), 254.031(a)(3), and 254.031(a)(6) of the Election Code, 4) failed to properly report total political contributions maintained on your campaign finance reports in violation of section 254.031(a)(8) of the Election Code, 5) improperly reported political expenditures as reimbursements in violation of section 254.031 of the Election Code and Texas Ethics Commission Rule 20.62, and 6) failed to include on campaign finance reports the principal occupation or job title and the full name of the employer of individuals that contributed in the aggregate \$500 or more to you during a reporting period, in violation of section 254.0612 or 254.0912 of the Election Code.

The complaint includes allegations that the respondent failed to sufficiently describe the purpose of political expenditures and converted political contributions to personal use, in violation of sections 254.031(a)(3) and 253.035 of the Election Code and section 20.61 of the Ethics Commission Rules. The complaint merely lists political expenditures and provides no evidence to support the allegations that the respondent converted political contributions to personal use. A complaint must state on its face an allegation that, if true, constitutes a violation of a law or rule administered or enforced by the commission. Government Code § 571.122(d). Therefore, the allegations related to conversion of political contributions to personal use will not be considered by

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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 Ethics Commission. As to the remaining allegations that the respondent failed to sufficiently describe the purpose of political expenditures, the commission will consider the sworn complaint allegations.

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.

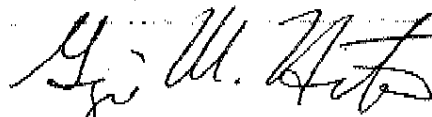
The sworn complaint allegations will be processed as Category Two violations. You are required to respond to an allegation of a Category Two violation not later than 25 business days from the date you receive this notice. **Failure to respond will constitute a separate violation for which a separate civil penalty may be assessed.**

The law requires the commission to send this sworn complaint notice by registered or certified mail, return receipt requested. Future notices and correspondence will be sent by regular mail, unless the commission is notified otherwise.

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,



Ginger M. Hunter
Assistant General Counsel

Jurisdiction accepted
For the Texas Ethics Commission



David A. Reisman
Executive Director

GMH:mc

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

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

**CERTIFIED MAIL NO. 7007 1490 0004 9890 7445,
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