



# City of San Antonio

Office of the  
City Clerk

## Sworn Complaint of Ethics Violations

Please fill this form out online and print it using the *Print* button provided.  
This form must be notarized.

For use of this form, see Section 2-83 of the City Ethics Code.

Any person, including a member of the Ethics Review Board or its staff, acting personally or on behalf of the Board, who believes that there has been a violation of the ethics laws may file a sworn complaint with the Office of the City Clerk.

<b>Complaint submitted by:</b>			
*First: <u>Mike</u>	M.I.: _____	*Last: <u>Villareal</u>	Suffix: _____
*Address: <u>639 Mission St</u>			
*City: <u>San Antonio</u>	*State: <u>TX</u>	*Zip Code: <u>78210</u>	
*Phone: <u>(210) 378-0197</u>	Alternate phone number: _____		

<b>Identify the person or persons who allegedly committed the violation:</b>			
*Full Name	Title or Position	Department	Add
Letitia Van de Putte	Candidate for Mayor		Delete

**\*Provide a statement of the facts on which the complaint is based, including the dates on which or period of time in which the alleged violation occurred:**

Leticia Van De Putte, candidate for Mayor of the City of San Antonio, has intentionally and knowingly violated the Municipal Campaign Finance Code by, in numerous instances, accepting more than one thousand dollars (\$1,000.00) in political contributions to her mayoral campaign from any individual or single entity per contribution cycle. Ms. Van de Putte has previously declared her candidacies (on separate occasions) for State Senator and for Lieutenant Governor, and received political contributions in connection with those candidacies. These two offices are not subject to campaign contribution limits, and Ms. Van de Putte reported receiving many contributions in excess of one thousand dollars, which she comingled in a single campaign finance account.

Ms. Van de Putte's campaign now reports that she has transferred in excess of \$300,000 from her campaign finance account for Lieutenant Governor and State Senator into her campaign finance account for her mayoral race. Ms. Van de Putte has made no attempt to return the portion of contributions to her prior campaigns that she received in excess of the applicable limit of one thousand dollars per person or entity or to comply with the requirements for allocating cash on hand in a transferor account to the most recent contributors to that account.

Each failure to return the portion of a campaign contribution in excess of one thousand dollars constitutes an offense under the Municipal Campaign Finance Code, punishable by a \$500 fine.

Section 2-302(b) of the Municipal Campaign Finance Code provides that "[a] candidate for Mayor or mayoral officeholder may not accept more than one thousand dollars (\$1,000.00) in political contributions from any individual or single entity per contribution cycle." Section 2-305(e) of the Municipal Campaign Finance Code provides that, if a candidate who has declared a candidacy for "any elected office" later "declares his or her candidacy for any elected municipal office" that "is subject to lower contribution limits than the previously sought office, the candidate shall return the contributions in excess of the limits for the municipal office sought."



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**\*Describe the nature of the alleged violation, including if possible, the rule or rules allegedly violated:**

These are identified in the foregoing section of this complaint.

**\*Describe all documents or other materials that are relevant to the allegation:**

Campaign finance records for Ms. Van de Putte's prior campaigns for State Senator and Lieutenant Governor.  
Campaign finance records for Ms. Van de Putte's campaigns for Mayor of San Antonio.

**\*Describe all documents or other material that are relevant to the allegation but that are not in your possession, including the location of the document or materials if known:**

Campaign finance records for Ms. Van de Putte's prior campaigns for State Senator and Lieutenant Governor.  
Campaign finance records for Ms. Van de Putte's campaigns for Mayor of San Antonio.  
These documents are in the possession of Ms. Van de Putte.

When completed, use the **Print** button to print the form. The form must be notarized before it is submitted.  
All relevant documentation should be included when submitting the form.



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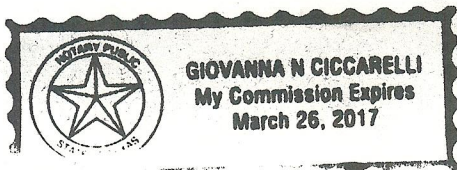
**Oath**

I swear or affirm that the statements contained in this "Sworn Complaint of Ethics Violations" form, including any accompanying documentation, to the best of my knowledge and belief are true, correct and complete. I also understand that a complaint filed in good faith is qualifiedly privileged. A person who knowingly makes a false statement in a complaint, or in proceedings before the Ethics Review Board, is subject to criminal prosecution for perjury or civil liability for the tort of abuse of process.

Michael U. Villarreal  
Signature of Individual Completing Complaint

Sworn to and subscribed before me by Michael U. Villarreal  
Printed Name of Individual Completing Complaint

On this 31<sup>st</sup> day of March, 2015, to certify which, witness my hand and seal.



Seal of Notary Public

Giovanna N. Ciccarelli  
Signature of Notary Public

Return completed form, along with all relevant documentation, to:

**Office of the City Clerk**

Mailing Address:  
P.O. Box 839966  
San Antonio, Texas 78283-3966

Physical Address:  
City Hall  
100 Military Plaza, 2<sup>nd</sup> Floor  
San Antonio, Texas 78205