



CITY OF SAN ANTONIO

Sworn Complaint of Ethics Violations

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

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.

Complaint submitted by:

*First: Rory M.I.: M *Last: Vance Suffix: _____

*Address: 3670 Stoney Branch *City: San Antonio

*State: T. ✓ *Zip Code: 78247 Email Address: rorymvance@gmail.com

*Primary Phone: 2108230120 Alternate Phone: _____

Identify the person or persons who allegedly committed the violation:

Full Name	Title or Position	Department	Board/Commissions
Beto Altamirano	Candidate for San Antonio Mayor		

COSA - CITY CLERK
2025 APR 08 PM 01:11

***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:**

Mr. Altamirano's campaign appears to have violated several provisions of the City of San Antonio's Campaign Finance Code, including Section 2-302(f), which prohibits undisclosed in-kind contributions of commercial value, and Section 2-302(d), which limits contributions from any individual or entity to \$1,000 per fundraising cycle. Additionally, the shared use of a commercial property by both Mr. Altamirano's campaign and Better Futures Institute—a 501(c)(3) nonprofit organization he co-founded—raises serious concerns about the improper commingling of nonprofit resources with political activity. According to the Internal Revenue Code, section 501(c)(3) organizations are "absolutely prohibited from directly or indirectly participating in, or intervening in, any political campaign on behalf of (or in opposition to) any candidate for elective public office," including through the use of in-kind resources such as office space, staff time, or material support. If Better Futures Institute is providing such resources to the campaign without proper disclosure or compensation, this would constitute a violation of IRS regulations and could jeopardize the nonprofit's tax-exempt status.

Compounding these concerns are three \$1,000 contributions accepted by the campaign on February 12, 2025, from Delaware-based LLCs—SLIM LLC, TBPS LLC, and Sunset Riders LLC—all registered to the same address at 8 The Green #B, Dover, DE 19901, a commercial agent hub used for anonymous business formation. This pattern is further complicated by Mr. Altamirano's own corporate background: his current company, Irys Technologies, is the rebranded successor to CityFlag LLC, a Texas-based entity that operated as the state branch of CityFlag Inc., a Delaware corporation also tied to the same Dover jurisdiction. Federal trademark records (IRYS, Serial No. 88815382) confirm that CityFlag Inc. restructured as Irys Technologies and changed its official incorporation from Texas to Delaware. This direct connection between Mr. Altamirano's personal corporate entities and the jurisdiction of the contributing LLCs raises serious concerns that shell companies may have been created and/or used to obscure the true origin of campaign funds.

Under the Texas Ethics Commission's Advisory Opinion No. 606, a limited liability company is prohibited from contributing to political campaigns if it is owned in whole or part by a corporation. Given the anonymous nature of these Delaware LLCs, their shared address, and the alignment with Mr. Altamirano's own Delaware-based corporate activity, there is substantial reason to believe these contributions may have originated from a corporate source—potentially violating Texas Election Code § 253.094, which prohibits corporate political contributions. These facts collectively raise significant concerns that the Altamirano campaign may have benefitted from the use of straw donor LLCs, corporate funds funneled through shell entities, and intentional efforts to evade campaign finance disclosure laws.

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

Summary of Alleged Violations:

Improper In-Kind Donation – Violation of Section 2-302(f):

“Political action committees, commercial entities, or campaign vendors cannot provide in-kind contributions with a commercial value to candidates or officeholders beyond the limits established in this section. Individuals may donate their time as campaign volunteers without limit. ‘In-kind’ contribution means goods or services provided to or by a person at no charge or for less than their fair market value.”

Mr. Altamirano’s campaign currently operates out of a commercial property located at 2003 W Commerce St., San Antonio, TX 78207. This property is not owned by Mr. Altamirano or his campaign, but rather by Cardinal Joint Ventures LLC, a business entity. No in-kind contribution for the use of this commercial space has been disclosed on Mr. Altamirano’s 30-day campaign finance report, despite the space being actively used for campaign-related operations, there is no record of a lease, rental payment, or in-kind donation related to this space.

According to the Bexar County Appraisal District website, the fair market value of the property is approximately \$275,000. The ongoing and unreported use of this commercial space, without rent or market compensation, constitutes an in-kind contribution of commercial value in direct violation of Section 2-302(f) of the San Antonio Municipal Code.

Exceeding Contribution Limits – Violation of Section 2-302(d):

Section 2-302(d) of the San Antonio Code of Ordinances states:

“A specific-purpose political action committee (SPAC) registered with the city and formed for the purpose of supporting or opposing a candidate for mayor or the mayoral officeholder for the city may not accept more than one thousand dollars (\$1,000.00) in political contributions from any individual or single entity per contribution cycle.”

Based on a review of Mr. Altamirano’s January 15 Semiannual Report and 30-Day Pre-Election Campaign Finance Report, the following contributions appear to violate Section 2-302(d) by exceeding the \$1,000 per contributor limit within a single contribution cycle:

Jose Torres
\$500 on 1/25/2025
\$1,000 on 1/25/2025
Total: \$1,500
Exceeds limit by \$500
John Agather
\$1,000 on 12/13/2024 (Jan 15 Semiannual Report)
\$1,000 on 1/28/2025 (30-Day Pre-Election Report)
Total: \$2,000
Exceeds limit by \$1,000
Patricio Spamer
\$1,000 on 7/23/2024 (Jan 15 Semiannual Report)
\$1,000 on 3/3/2025 (30-Day Pre-Election Report)
Total: \$2,000
Exceeds limit by \$1,000
Diana Solano
\$50 on 12/31/2024 (Jan 15 Semiannual Report)
\$1,000 on 3/24/2025 (30-Day Pre-Election Report)
Total: \$1,050
Exceeds limit by \$50
Carl Bishop
\$250 on 12/4/2024 (Jan 15 Semiannual Report)
\$750 on 3/12/2025
\$50 on 2/15/2025

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

Section 2-302(f) of municipal code, <https://www.instagram.com/teambetohq/p/DF6Ci8Mx6ty/>,
https://opencorporates.com/companies/us_tx/0800127460,,
https://webapp5.sanantonio.gov/CampFinHistoricPDFFiles/rpt00000003225_20250116_094810.pdf, <https://research.bcad.org/>,
Section 2-302(d) of municipal code ,
https://webapp5.sanantonio.gov/CampFinHistoricPDFFiles/rpt00000003225_20250116_094810.pdf, <https://www.bfinstitute.org/>,
<https://projects.propublica.org/nonprofits/organizations/473533968>, <https://www.expressnews.com/business/article/san-antonio-s-better-futures-institute-supports-18482913.php>, [https://www.irs.gov/charities-non-profits/charitable-organizations/restriction-of-political-campaign-intervention-by-section-501c3-tax-exempt-organizations#:~:text=Under%20the%20Internal%20Revenue%20Code,candidate%20for%20elective%20public%20office](https://www.irs.gov/charities-non-profits/charitable-organizations/restriction-of-political-campaign-intervention-by-section-501c3-tax-exempt-organizations#:~:text=Under%20the%20Internal%20Revenue%20Code,candidate%20for%20elective%20public%20office,),,
<https://www.delawareregisteredagent.com/contact-us>,
https://opencorporates.com/companies/us_de/10114251, https://opencorporates.com/companies/us_tx/0802198785,
https://opencorporates.com/companies/us_de/6303807, <https://trademark.iustia.com/888/15/irys->

***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:**

not applicable.

100 W. Houston, Concourse Level
San Antonio, Texas 78205

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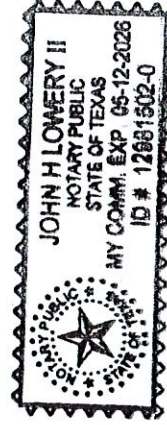
Oath

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 qualified 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.

B. M. Vance
Signature of Individual Completing Complaint

Sworn to and subscribed before me by Rory Michael Vance
Printed Name of Individual Completing Complaint

On this 8th day of April, 2025 to certify which, witness my hand and seal.



Seal of Notary Public

[Signature]
Signature of Notary Public

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Return completed form, along with all relevant documentation to:

Physical Address: