



GONZALEZ CHISCANO
ANGULO & KASSON, PC

9601 McAllister Fwy., Suite 401, San Antonio, TX 78216

Tel: 210-569-8500 Fax: 210-569-8490

www.gcaklaw.com

Henry B. Gonzalez, III
Steve Alfonso Chiscano
David S. Angulo
Richard J. Kasson

Nadeen Abou-Hossa
Direct Tel: 210-569-8481
nabou-hossa@gcaklaw.com

April 9, 2025

Julisa Medrano-Guerra
303 King William
San Antonio, Texas 78204

Email: campaign@julisaforSA.com

Re: Ethics Complaint against Councilmember Sukh Kaur

Dear Ms. Medrano-Guerra,

Pursuant to Section 2-84(d) of the City of San Antonio Ethics Code, I have been designated as independent counsel and compliance auditor by the City Attorney to analyze and process your sworn complaint against City Councilmember Sukh Kaur ("Respondent"). This entails conducting an initial review of your Complaint to determine whether it alleges a violation of a standard subject to the jurisdiction of the City's Ethics Review Board ("ERB"). I received a copy of your Complaint on April 2, 2025. In preparation for this analysis, I conferred with the Chair of the ERB regarding the scope and interpretation of the applicable provisions. The following analysis reflects a shared understanding and agreement concerning the threshold requirements for a complaint to proceed.

Standard. A sworn complaint must state on its face an allegation that, if true, would constitute a violation of the Ethics Code.

Allegations. Your sworn complaint alleges that the Respondent violated the following standards found in Chapter 2, Article III of the Ethics Code:

- Section 2-49: Public Property and Resources
- Section 2-50: Political Activity
- Section 2-73: Financial Disclosure Report
- Section 2-74: Contents of Financial Disclosure Reports
- Section 2-43: Conflicts of Interest
- Section 2-44: Unfair Advancement of Private Interests
- Section 2-41: Statement of Purpose

Analysis.

- **Section 2-43: Conflicts of Interest** - To support a violation of Section 2-43, the facts must indicate that Respondent took an official action that she knew was likely to affect the

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economic interests of a category of individuals and entities (listed in 2-43(a)(1)-(9)). Your Complaint does not provide facts to show that the Respondent took any official action that she knew was likely to affect the economic interests of any of the categories, individuals, or entities listed in Section 2-43(a)(1)-(9).

- **Section 2-44: Unfair Advancement of Private Interests** - To support a violation of Section 2-44, the facts must indicate that the Respondent used her official position to unfairly advance or impede private interests, or to grant or secure, or attempt to grant or secure, for any person any form of special consideration, treatment, exemption, or advantage beyond that which is lawfully available to other persons. However, your Complaint does not allege facts indicating that the Respondent engaged in such conduct.
- **Section 2-41: Statement of Purpose** - Section 2-41 provides that “[t]his section shall not be used for the basis of an ethics complaint.”

Section 2-73: Financial Disclosure Report and Section 2-74: Contents of Financial Disclosure Reports - As outlined in Section 2-73 of the City’s Ethics Code, candidates for City Council and city officials who are required to file financial disclosure statements pursuant to Chapter 145 of the Texas Local Government Code must do so in accordance with that chapter, in lieu of filing the financial disclosure statement required under the City’s Code of Ethics. If an individual is notified or otherwise becomes aware after the filing deadline that their personal financial statement was incorrect or incomplete, they are required to file a corrected statement. Accordingly, the City Clerk has notified the Respondent of these requirements.

Conclusion. Even if all the facts asserted in your sworn complaint were taken as true, the allegations would not constitute a violation of Section 2-43 or Section 2-44, and the Ethics Code states that Section 2-41 shall not be used for the basis of an ethics complaint.

Pursuant to Section 2-83(d)(3), I have concluded that your Complaint does not support an alleged violation of Section 2-43 or Section 2-44. Additionally, the City Clerk has notified the Respondent regarding the requirements related to the alleged violations of Section 2-73 and Section 2-74. You will be provided with a copy of any corrections submitted, and they will also be provided to the Ethics Review Board for consideration.

The City Clerk has forwarded the remaining allegations in your Complaint to the ERB and the Respondent. These allegations include the alleged violations of Section 2-49 and Section 2-50 that you outline in your Complaint. A copy of that correspondence is attached.

Sincerely,

GONZALEZ, CHISCANO, ANGULO & KASSON, P.C.



Nadeen Abou-Hossa

April 9, 2025

Special Counsel, City of San Antonio Ethics Review Board

NA/mrs

CC: Camila W. Kunau, City Attorney's Office
Office of the City Clerk
Office of the City Auditor



CITY OF SAN ANTONIO

OFFICE OF THE CITY CLERK

P.O. BOX 839966

SAN ANTONIO, TEXAS 78283-3966

TEL: 210-207-7253

April 9, 2025

Councilmember Sukh Kaur
P.O. Box 120101
San Antonio, TX 78212

RE: Sworn Complaint Alleging Violations of the City's Ethics Code

Dear Councilmember Kaur,

This letter is to inform you that a sworn ethics complaint was filed by Julisa Medrano-Guerra on April 1, 2025. As required by the Code of Ethics, the City Attorney's Office has retained Independent Counsel to review the complaint and advise the Ethics Review Board ("ERB") accordingly. Independent Counsel has determined that the following alleged violations should be forwarded to the ERB :

- Section 2-49: Public Property and Resources
- Section 2-50: Political Activity

Additionally, this letter serves as official notice that the complaint noted above alleges inaccurate or incomplete information on your Personal Financial Statement and PFS-Addendum. As outlined in Section 2-73 of the City's Ethics Code regarding financial disclosure reports, candidates for City Council and city officials who are required to file financial disclosure statements pursuant to Chapter 145 of the Texas Local Government Code shall do so in accordance with the provisions of that chapter, in lieu of filing the financial disclosure statement required under this Code of Ethics.

If the event you are notified or otherwise discover after the filing deadline that the personal financial statement you submitted was incorrect or incomplete, you are required to file a corrected statement. For further guidance, please contact the Texas Ethics Commission at 512-463-5800. A copy of the correction form is available on their website at [pfsfrm-LOC.html](https://www.ethics.texas.gov/pfsfrm-LOC.html).

In addition to the above, and in accordance with Sections 2-83(d) and (e) of the City's Code of Ethics, I am to inform you of the following:

1. Within ten (10) business days of receiving the enclosed complaint, you may file a sworn response with this office;
2. Failure to file a response does not preclude the Ethics Review Board from adjudicating the complaint;
3. A copy of any response you submit will be provided to the complainant, who may within five (5) business days file a sworn reply with this office, a copy of which will be provided to you;
4. Any amended reports or personal financial statements submitted during this time will be provided to the complainant and included in the file forwarded to the ERB, if applicable.
5. Either you or the complainant may request a hearing before the Ethics Review Board; and
6. City officials and employees have a duty to cooperate with the Ethics Review Board and its counsel.

Pursuant to Section 2-81(g)(2), your appointee to the ERB must recuse himself from involvement in the complaint.

Enclosed you will find a copy of the complaint, along with a copy of Section 2-83 of the Ethics Code. The full Ethics Code can be found in Chapter 2, Article III of the City's Code of Ordinances, available online at: https://library.municode.com/tx/san_antonio/codes

If you have any questions, please contact my office at 210-207-7253.

Sincerely,

A handwritten signature in cursive script, reading "Debbie Racca-Sittre".

Debbie Racca-Sittre
City Clerk

cc: Nadeen Abou-Hossa, Independent Counsel & Compliance Auditor
Chair, Ethics Review Board

Enclosures: Complaint submitted by Julisa Medrano-Guerra
Ethics Code: Sections 2-83