



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: Eric M.I.: M *Last: Litaker Suffix:

*Address: 4335 Eagle Nest *City: San Antonio

*State: TX *Zip Code: 78233 Email Address: Eric4libertysatx@gmail.com

*Primary Phone: 2103631955 Alternate Phone:

Identify the person or persons who allegedly committed the violation:

Full Name	Title or Position	Department	Board/Commissions
Marc Whyte	City Council District 10		
William P. McManus	Chief of Police	SAPD	

*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:

On Saturday, April 19th, 2025, Councilman Marc Whyte posted photographs on his campaign Facebook page "Marc Whyte Campaign", that included himself and Chief William McManus of the SAPD, campaigning to a group of people while wearing City of San Antonio logos. Marc Whyte was wearing a shirt with the City of San Antonio logo embroidered on the front, and Chief McManus was wearing a hat with the San Antonio Police Department logo.

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

This violates the state law against the "Use of City Resources."

Use of City Resources

State law prohibits the use of City resources, equipment, or money for election campaigning. This includes the use of photographs involving City employees (i.e., photos taken while that employee is on duty or with visible City insignia on their clothing) and City equipment in campaign materials including social media posts from campaign accounts. Please note that this prohibition remains in place even with the recent changes to the City Charter concerning City employee participation in local elections.

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

I have screenshots of the photographs that were posted on the Facebook page.

***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:**

The photographs are posted on the Facebook page "Marc Whyte Campaign" on the date of April 19th, 2025.

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.



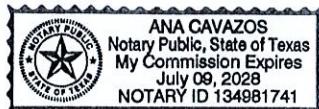
Signature of Individual Completing Complaint

Sworn to and subscribed before me by

Ana CAVAZOS

Printed Name of Individual Completing Complaint

On this 21 day of April, 2025 to certify which, witness my hand and seal.



Seal of Notary Public



Signature of Notary Public

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Return completed form, along with all relevant documentation to:

Physical Address:
100 W. Houston, Concourse Level
San Antonio, Texas 78205