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July 11, 2025

Elly Walls
9103 Contesta Dr
San Antonio, Texas 78216
Re: Ethics Complaint filed on June 20, 2025

Email: cbpnape@gmail.com

Dear Ms. Walls,

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 former Mayor Ron Nirenberg ("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").

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 2-74: Contents of Financial Disclosure Reports¹

Analysis. 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.

¹ While your complaint references Section 2-74, Section 2-73 may also be relevant since the Respondent is required to file a Personal Financial Statement under Chapter 145 of the Texas Local Government Code.

Friday, July 11, 2025

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 will notify the Respondent of these requirements.

Conclusion. The Respondent will be notified of the requirements related to the Personal Financial Statement and associated addendum. 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 will forward the remaining allegations in your Complaint regarding alleged violations of Section 2-49 to the ERB and the Respondent.

Sincerely,



Nadeen Abou-Hossa
Special Counsel, City of San Antonio Ethics Review
Board

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