



CITY OF SAN ANTONIO

OFFICE OF THE CITY CLERK
P.O. BOX 839966
SAN ANTONIO, TEXAS 78283-3966
TEL: 210-207-7253
FAX: 210-207-7032

August 26, 2025

Mayor Gina Ortiz Jones
City of San Antonio
100 Military Plaza
San Antonio, TX 78205

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

Dear Mayor Jones,

This letter is to inform you that a sworn ethics complaint against you was filed by Kyle Sinclair on July 16, 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

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. As provided by Section 2-85 of the Ethics Code, while either the complainant or respondent may request a hearing, the decision rests solely with the ERB or panel assigned to the matter; and
5. City officials and employees have a duty to cooperate with the ERB and its counsel.

Pursuant to Section 2-81(g)(2), the Mayoral 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 and 2-84 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 feel free to contact me or Destiny Salinas with the Office of the City Clerk.

Sincerely,



Debbie Racca-Sitre
City Clerk

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

Enclosures: Complaint submitted by Kyle Sinclair
Letter from Appointed Counsel to Complainant
Ethics Code: Sections 2-83 and 2-84



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: Kyle M.I: *Last: Sinclair Suffix:

Identify the person or persons who allegedly committed the violation:

| Full Name | Title or Position | Department | Board/Commissions |
|------------------|-------------------|----------------|-------------------|
| Gina Ortiz Jones | Mayor | Mayor's Office | |

***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 July 1, 2025 Mayor (non-partisan position) Gina Ortiz Jones used her position, title, city seal to officially request the Democratic National Convention to be held in San Antonio. The city's Ethics Code, specifically Sec. 2-47(c) and Sec. 2-49, restricts city officials from using their official position or city resources (like the city seal and letterhead) for private or political purposes. Since the Democratic National Convention is a partisan political event, using official resources to request hosting is in direct violation.

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

The city's Ethics Code, specifically Sec. 2-47(c) and Sec. 2-49, restricts city officials from using their official position or city resources (like the city seal and letterhead) for private or political purposes. Since the Democratic National Convention is a partisan political event, using official resources to request hosting is in direct violation.

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

July 1, 2025 - Formal letter with city seal and signed by Mayor Gina Jones

July 3, 2025 KSAT news article

Mayor Gina Ortiz Jones proposes San Antonio as host for 2028 Democratic National Convention

Jones says San Antonio would be a suitable fit for the convention

Spencer Heath, Digital Journalist

Published: July 3, 2025 at 7:59 PM

***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:**

N/A

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

Kyle Sinclair

Printed Name of Individual Completing Complaint

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



Signature of Notary Public

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.

Return completed form, along with all relevant documentation to:

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



CITY OF SAN ANTONIO

GINA ORTIZ JONES
MAYOR

July 1, 2025

Ken Martin
Chair, Democratic National Committee
Alex Hornbrook
Executive Director, Democratic National Convention Committee
430 South Capitol Street, SE
Washington, D.C. 20003

Dear Mr. Martin and Mr. Hornbrook,

On behalf of the City of San Antonio, I am honored to submit this letter of interest to host the 2028 Democratic National Convention. Our city – bold, inclusive, and emblematic of the American future – would be a fitting and inspiring home for this historic event.

At the heart of downtown San Antonio stands our newly renovated Alamodome, a 60,000-seat indoor stadium that pairs seamlessly with the adjoining Henry B. González Convention Center. The convention center features over 70 meeting rooms, 514,000 sq ft of contiguous exhibit space, two elegant ballrooms, an iconic 2,300-seat theater, and numerous flexible event spaces. Together with the over 15,000 hotel rooms in the city center and 50,000 hotel rooms across the metro, these venues host more than 300 events annually and welcome over 750,000 delegates from around the globe—to include most recently the 2025 NCAA Men's Final Four.

San Antonio is our nation's seventh-largest city and offers an unparalleled visitor experience. Our diverse array of hotel accommodations, many within walking distance of the Alamodome and convention center, are matched by a rich culinary scene shaped by our unique cultural heritage. As the only Texas city with a UNESCO World Heritage Site designation for our Historic Spanish Missions, and one of only two UNESCO Cities of Gastronomy in the United States, we offer a wealth of cultural districts, world-class museums, culinary experiences, and iconic attractions including the Alamo, Riverwalk, and SeaWorld San Antonio.

Known as Military City USA and home to a population where 16% of our neighbors identify as a veteran or active-duty service member, we pride ourselves in our contributions to the Nation's security. We are equally proud of our rich history of civic engagement. The Mexican American Legal Defense and Educational Fund (MALDEF) was founded in San Antonio in 1968, and we

host the largest Martin Luther King, Jr. Day March in the country each year. Finally, we are home to the country's oldest and largest Hispanic Chamber of Commerce.

San Antonio is known for two things: compassion and common sense. Our residents are warm, welcoming, and proud of the cultural richness that defines our city and the future of our nation.

I deeply appreciate your consideration and look forward to the opportunity to partner with the Democratic National Committee in delivering a vibrant and memorable 2028 Convention.

Respectfully,



Gina Ortiz Jones
Mayor

NEWS WEATHER SPORTS KSAT PLUS KSAT LIVE KSAT INSIDER KSAT CONNECT ENTERTAINMENT FEATURES

WEATHER ALERT A flood warning is in effect for Victoria County

LOCAL NEWS

Mayor Gina Ortiz Jones proposes San Antonio as host for 2028 Democratic National Convention

Jones says San Antonio would be a suitable fit for the convention

Spencer Heath, Digital Journalist

Published: July 3, 2025 at 7:59 PM

Tags: Gina Ortiz Jones, San Antonio, Politics, City Hall



x

Gina Ortiz Jones was sworn in as mayor of San Antonio on Wednesday, June 18, 2025. (Alexis Montalbo, KSAT)

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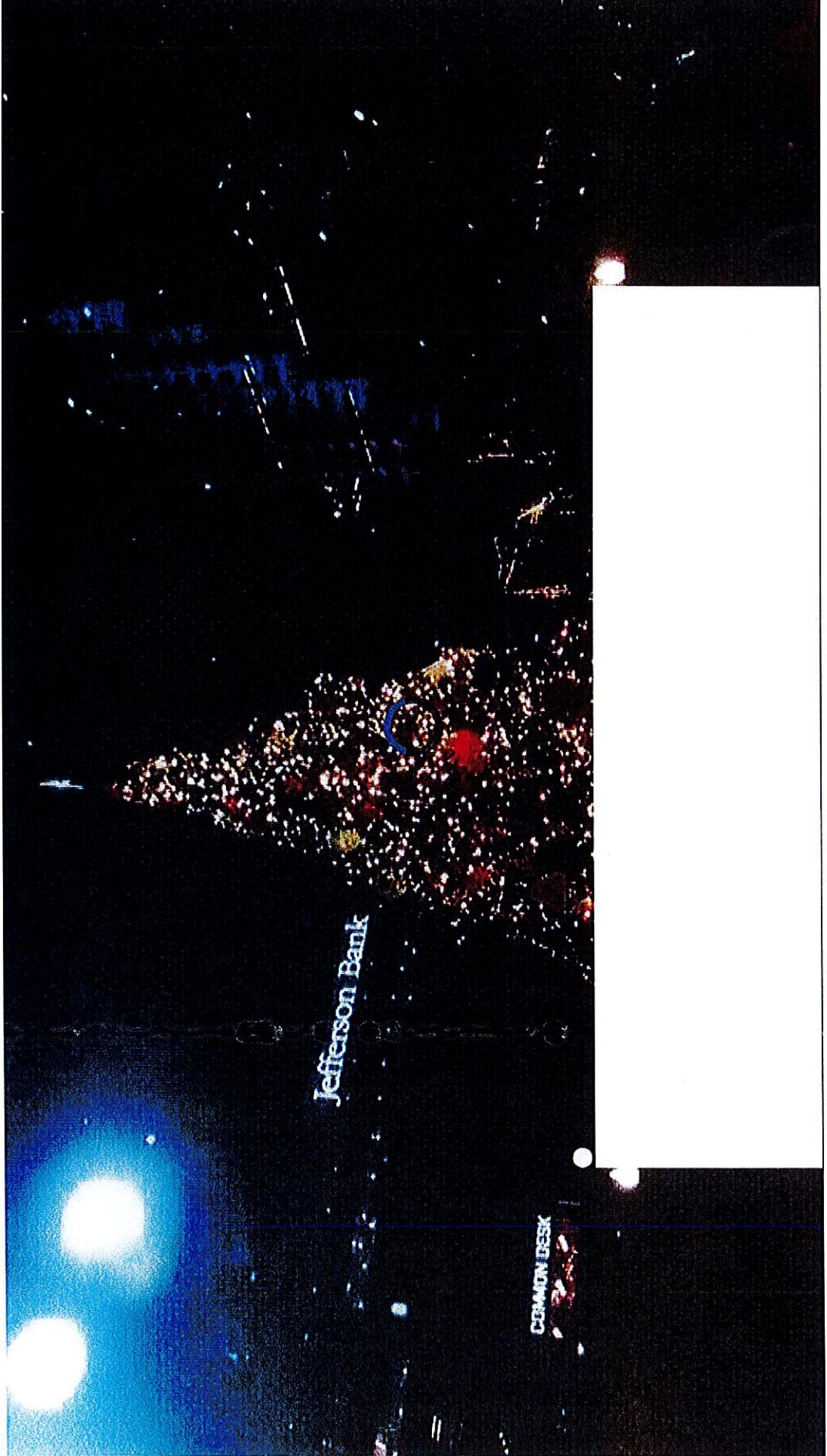


SAN ANTONIO - Mayor Gina Ortiz Jones submitted a formal request on Tuesday for the 2028 Democratic National Convention to be held in San Antonio, according to a letter obtained by KSAT.

Jones sent the letter to the Chair of the Democratic National Committee, Ken Martin, as well as the Executive Director of the Democratic National Convention Committee, Alex Hornbrook.

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"Our city — bold, inclusive, and emblematic of the American future — would be fitting and inspiring home for this historic event," Jones said.

In the letter, Jones mentioned two downtown venues, the Alamodome and the Henry B. González Convention Center, as potential locations for the convention.

"The convention center features over 70 meeting rooms, 514,000 sq. ft contiguous exhibit space, two elegant ballrooms, an iconic 2,300-seat theater, and numerous flexible event

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Jones said that San Antonio would be a suitable fit for the convention as it is the nation's seventh-largest city.

She stated that, in addition to numerous hotel options within walking distance of the Henry B. González Convention Center and the Alamodome, San Antonio offers a variety of activities.

"We offer a wealth of cultural districts, world-class museums, culinary experiences and iconic attractions, including the Alamo, River Walk, and SeaWorld San Antonio," Jones said. Known as Military City USA, Jones said that San Antonio has a strong connection to the nation's security, with 16% of its population identifying as veterans or active-duty service members.

Jones said that San Antonio is known for compassion and common sense, with residents who are warm, welcoming and proud of their cultural richness.

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"I deeply appreciate your consideration and look forward to the opportunity to partner with the Democratic National Convention in delivering a vibrant and memorable 2028 Convention," Jones stated.

The entire letter can be read below:

[2025.07.01 Mayor Jones Democratic National Convention Committee Interest by Spencer Heath on Scribd](https://www.ksat.com/news/local/2025/07/04/mayor-gina-ortiz-jones-proposes-san-antonio-as-host-for-2028-democratic-national-convention/)

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[SCR|BD]



ABOUT THE AUTHOR

CITY OF SAN ANTONIO

Spencer Heath

Spencer Heath is a Digital Journalist at KSAT. Spencer graduated from the University of Texas at Austin with a Bachelor's degree in Mass Media and Television-Film. He's worked as a journalist in San Antonio since June of 2022. Outside the newsroom, he enjoys watching movies and spending time with family. **MAYOR**

Conversation

Join the conversation

ALL COMMENTS 66

caracara 2 DAYS AGO

So RON said no to GOP convention, so DNC is ok ?? Just asking for a friend

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Reply to Carvalho

Rep: The reasons cited for this decision included concerns about

security: The potential security costs associated with hosting such a large event.

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nabou-hossa@gcaklaw.com

August 1, 2025

Kyle Sinclair
11507 Lily Blair
San Antonio, Texas 78253

Email: sinclair.kyle@gmail.com

Re: Ethics Complaint filed on July 16, 2025

Dear Mr. Sinclair,

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 Mayor Gina Ortiz Jones (“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 2-47(c): Prestige of Office and Improper Influence
- Section 2-49: Public Property and Resources

Analysis.

- **Section 2-47(c): Prestige of Office and Improper Influence:** This section of the code prohibits a City official or employee, in connection with the representation of private interests before the City, from asserting the prestige of their official position to advance private interests or from implying that they can influence City action on any basis other than the merits.

Your complaint alleges that the Respondent used her position, title, and the City seal to request that the Democratic National Committee consider San Antonio as the host city for the 2028 Democratic National Convention. However, the conduct described does not involve the representation of a private interest *before the City*, which is a threshold requirement of Section 2-47(c).

Under Section 2-42(d) of the Ethics Code, representation or appearance “before the City” means communication directed “before the City Council; before a board, commission, or other City entity; or before a City official or employee.” Because Respondent’s Letter was directed outward to an external organization and expressed interest in hosting a national event, it does not constitute representation “before the City.” As such, it does not, on its face, allege a violation of Section 2-47(c).

- **Section 2-49: Public Property and Resources:** This section of the code prohibits the use of City property, equipment, supplies, or resources for private purposes unless such use is authorized or available to the public on equal terms.

Your Complaint alleges that the Respondent used official City resources, including the City seal and letterhead, in connection with a communication related to a partisan political convention. These allegations, if true, may fall within the scope of Section 2-49 and meet the threshold standard set forth in Section 2-83.

Conclusion. Even if all the facts in your sworn Complaint were taken as true, the allegations would not constitute a violation of Section 2-47(c) because they do not involve the representation of private interests before the City. Accordingly, that portion of the Complaint is being returned pursuant to Section 2-83(d)(3).

The City Clerk will forward the remaining allegations in your Complaint regarding the alleged violations of Section 2-49 to the ERB and the Respondent.

Sincerely,

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



Nadeen Abou-Hossa

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

Sec. 2-83. Complaints.

(a) Filing. 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 or the municipal campaign finance code may file a sworn complaint with the city clerk to allege such violations.

A complaint filed in good faith is qualifedly 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 (see subsection 2-87(g) (criminal prosecution)) or civil liability for the tort of abuse of process.

(b) Assistance. The city clerk shall provide information to persons who inquire about the process for filing a complaint.

(c) Form. A complaint filed under this section must be in writing and under oath and must set forth in simple, concise, and direct statements:

- (1) The name of the complainant;
- (2) The street or mailing address and the telephone number of the complainant;
- (3) The name of each person complained about;
- (4) The position or title of each person complained about;
- (5) The nature of the alleged violation, including, if possible, the specific provision of the ethics code or municipal campaign finance code alleged to have been violated;
- (6) A statement of the facts constituting the alleged violation and the dates on which or period of time in which the alleged violation occurred; and
- (7) All documents or other material available to the complainant that are relevant to the allegation; a list of all documents or other material relevant to the allegation and available to the complainant but that are not in the possession of the complainant, including the location of the documents, if known; and a list of all documents or other material relevant to the allegation but unavailable to the complainant, including the location of the documents, if known.

The complaint must be accompanied by an affidavit stating that the information contained in the complaint is either true and correct or that the complainant has good reason to believe and does believe that the facts alleged constitute a violation of the ethics code or the municipal campaign finance code. If the complaint is based on information and belief, the complaint shall state the source and basis of the information and belief. The complainant shall swear to the facts by oath before a notary public or other person authorized by law to administer oaths under penalty of perjury. A complaint that is not sworn as required shall not be forwarded by the city clerk to the compliance auditor as provided in subsection (d), but shall be returned to the complainant.

The complaint must state on its face an allegation that, if true, constitutes a violation of a law administered and enforced by the board.

(d) Review by the compliance auditor and notification to the ethics review board and respondents.

- (1) A copy of a complaint shall be promptly forwarded by the city clerk to the chair and vice chair of ERB, compliance auditor and city attorney's office who shall each independently review the complaint for compliance with the filing requirements of subsection (c) within five (5) business days of receipt from the city clerk. The city clerk shall notify the respondent(s) of a complaint filed. this notification is for information purposes only and does not trigger subsection (e) until a decision has been made to accept the complaint and forward to the full ERB for consideration.

- (2) If the complaint alleges a violation of section 2-306 or section 2-307 of the municipal campaign finance code, the complaint shall be forwarded by the city clerk to the respondent within five (5) business days of receipt by the compliance auditor. As set out in subsection 2-82(b)(2), the timely filing of the campaign bank account statement or the amended report, as verified by the city clerk, shall not be considered a violation. The city clerk shall notify the complainant of the filing of the statement or the amended report by first class mail.
- (3) If the complaint alleges a violation of the ethics code, and substantially complies with the filing requirements, the complaint shall be forwarded by the city clerk to the members of the ethics review board and the respondents within ten (10) business days after receipt of the complaint from city clerk. If the complaint does not substantially comply with the filing requirements, the compliance auditor shall return the complaint to the complainant with a letter explaining the defects in the complaint.
- (4) The city clerk shall notify the respondent(s) of the resolution of a complaint.

(e) The respondent(s) shall also be provided with a copy of the ethics code and shall be informed:

- (1) That, within ten (10) business days of receipt of the complaint, they may file a sworn response with the city clerk;
- (2) That failure to file a response does not preclude the ethics review board from adjudicating the complaint;
- (3) That a copy of any response filed by the respondent(s) will be provided by the city clerk to the complainant, who may, within five (5) business days of receipt, respond by sworn writing filed with the city clerk, a copy of which shall be provided by the city clerk to the respondent(s);
- (4) That the complainant(s) or respondent(s) may request a hearing; and;
- (5) That city officials and employees have a duty to cooperate with the ethics review board.

Upon receipt, the city clerk shall forward the response to the compliance auditor, city attorney's office, and the ethics review board.

(f) Frivolous complaint.

- (1) For purposes of this section, a "frivolous complaint" is a sworn complaint that is groundless and brought in bad faith or groundless and brought for the purpose of harassment.
- (2) By a vote of at least two-thirds (2/3) of those present, the board may order a complainant to show cause why the board should not determine that the complaint filed by the complainant against a respondent is a frivolous complaint.
- (3) In deciding if a complaint is frivolous, the board will be guided by the Texas Rules of Civil Procedure, Rule 13, and interpretations of that rule, and may also consider:
 - a. The timing of the sworn complaint with respect to when the facts supporting the alleged violation became known or should have become known to the complainant, and with respect to the date of any pending election in which the respondent is a candidate or is involved with a candidacy, if any;
 - b. The nature and type of any publicity surrounding the filing of the sworn complaint, and the degree of participation by the complainant in publicizing the fact that a sworn complaint was filed with the board;
 - c. The existence and nature of any relationship between the respondent and the complainant before the complaint was filed;

City of San Antonio Code of Ethics

https://library.municode.com/tx/san_antonio/codes/code_of_ordinances?nodeId=PTIICO_CH2AD_ARTIIICOET

- d. If respondent is a candidate for election to office, the existence and nature of any relationship between the complainant and any candidate or group opposing the respondent;
- e. Any evidence that the complainant knew or reasonably should have known that the allegations in the complaint were groundless; and
- f. Any evidence of the complainant's motives in filing the complaint.

(4) Notice of an order to show cause shall be given to the complainant, with a copy to the respondent, and shall include:

- a. An explanation of why the complaint against a respondent appears to be frivolous; and
- b. The date, time, and place of the hearing to be held under this section.

(5) Before making a determination that a sworn complaint against a respondent is a frivolous complaint, the board shall hold a hearing at which the complainant may be heard; the complainant may be accompanied by counsel retained by the complainant.

(6) By a record vote of at least two-thirds ($\frac{2}{3}$) of those present after the hearing under subsection (5) of this section, the board may determine that a complainant filed a frivolous complaint against a respondent and may recommend sanctions against that complainant.

(g) Sanctions for filing frivolous complaints.

(1) Before imposing a sanction for filing a frivolous complaint, the board shall consider the following factors:

- a. The seriousness of the violation, including the nature, circumstances, consequences, extent, and gravity of the violation;
- b. The sanction necessary to deter future violations; and
- c. Any other matters that justice may require.

(2) The Board may impose the following sanctions:

- a. A civil penalty of not more than five hundred dollars (\$500.00);
- b. Imposition of attorneys' fees incurred by the respondent of the frivolous complaint;
- c. Any other sanction permitted by law.

(3) The board may notify the appropriate regulatory or supervisory agency for their appropriate action. This may include a referral to a criminal investigation agency or prosecution entity for investigation of perjury.

(h) Confidentiality. Ex parte communications by members of the ethics review board are prohibited by subsection 2-85(e) (ex parte communications).

(1) The board and its staff shall not communicate any information about a pending sworn complaint, including whether or not a complaint has been filed, to any person other than the respondent, the complainant, and a witness or potential witness identified by the respondent, the complainant, or another witness or potential witness.

(2) Information otherwise confidential under this section may be disclosed by entering it into the record of a formal hearing or ethics review board proceeding.

(3) Requests for records pertaining to complaints shall be responded to in compliance with the Texas Public Information Act and the Texas Open Meetings Act.

(Ord. No. 2013-05-09-0317, § 2(Att. B), 5-9-13; Ord. No. 2018-06-21-0491, § 1(Att. A), 6-21-18; Ord. No. 2024-05-02-0274, § 1(Att. A), 5-2-24)

Sec. 2-84. Compliance auditor and city attorney's office.

- (a) Compliance auditor. The compliance auditor shall be selected by the ethics review board and appointed by the city internal auditor. The compliance auditor may be removed from office for cause by the city internal auditor only after consultation with the ethics review board.
- (b) The compliance auditor shall perform the following duties:
 - (1) Receive complaints and responses filed with the city clerk as set forth in section 2-83;
 - (2) Investigate, marshal, and present to the ethics review board the evidence bearing upon a complaint;
 - (3) In consultation with city council, the city manager, the ethics review board, human resources department, and the city attorney's office, develop and implement a comprehensive training program for the officials and employees of the city on the provisions of this code of ethics, section 141 of the city charter, and V.T.C.A., Local Government Code ch. 171;
 - (4) Review complaints for sufficiency;
 - (5) Recommend acceptance or rejection of complaint made to the ethics review board;
 - (6) Request additional information from complainant as needed; and
 - (7) Support the reasonable requests of the ERB.
- (c) City attorney's office. The city attorney's office shall perform the following duties:
 - (1) Act as legal counsel to the compliance auditor and the ethics review board;
 - (2) Upon request by the compliance auditor, review complaints for legal sufficiency; and
 - (3) Issue advisory opinions to city officials and employees about the requirements imposed by the ethics laws.
- (d) Independent compliance auditor and independent counsel.
 - (1) An independent attorney, who does not otherwise represent the city, shall be appointed to serve as the independent compliance auditor and counsel when a complaint is filed relating to an alleged violation of the ethics laws by the mayor, a member of the city council, or a candidate for city council.
 - (2) When a complaint is filed relating to an alleged violation of the ethics laws by a city employee who is a department head or of higher rank, the compliance auditor may recommend the appointment of an independent compliance auditor to serve as compliance auditor for that matter. The city attorney may also recommend the appointment of an independent counsel for that matter.
 - (3) The city attorney or ethics review board may request the appointment of an independent counsel for a particular case.
- (e) Exculpatory evidence. The compliance auditor shall disclose to the ethics review board and provide to the person charged with violating the ethics or municipal campaign finance laws evidence known to the compliance auditor tending to negate guilt or mitigate the seriousness of the offense.

(Ord. No. 2013-05-09-0317, § 2(Att. B), 5-9-13; Ord. No. 2018-06-21-0491, § 1(Att. A), 6-21-18)