

III. NATURE OF ALLEGED VIOLATION

Page 2

Include the specific law(s) or rule(s) alleged to have been violated. YOU MUST ALLEGE A VIOLATION OF A LAW THAT IS WITHIN THE COMMISSION'S JURISDICTION. The Texas Ethics Commission has jurisdiction to enforce only the following laws: (1) Title 15 of the Election Code; (2) Chapters 302, 303, 305, 572 and 2004 of the Gov't Code; (3) § 334.025 and § 335.055 of the Local Gov't Code; (4) Chapter 159 of the Local Gov't Code, in connection with a county judicial officer who elects to file a financial statement with the commission; and (5) § 2152.064 and § 2155.003 of the Gov't Code.

Please completely fill out this form.

Failure to complete this form properly will cause your complaint to be noncompliant and returned.

Eloy Vera was first elected to the office of Starr County Judge in 1998 and has been consistently re-elected since then, often facing opponents at the ballot box. However, he has no Campaign Treasurer Appointment on file (as required by Election Code 252.001), has made expenditures without a campaign treasurer on file (in violation of Election Code 253.031(a)), and has continually failed to file campaign finance reports (in violation of Election Code 254.041(a)(1)) despite raising and spending funds to facilitate his re-elections.

Vera has faced opponents in 2014, 2018, and 2022. Throughout that time, Vera has disregarded the state's campaign finance reporting requirements, denying the public information as to who supported his campaign and who he paid using campaign funds. Neither the Starr County Clerk nor the Starr County Elections Administrator have a campaign treasurer appointment or any campaign finance reports relating to Vera's electoral activity (see Texas Election Code 252.005).

In the 2014 Democratic primary, Vera defeated two challengers - Lupe Amador and Guillermo Gonzalez, Jr. However, there are no campaign finance reports on file with the local filing authority, indicating that Vera failed to file the required disclosures. This indicates a failure to comply with Election Code Sections 254.063 and 254.064.

In the 2018 Democratic primary, Vera defeated Letty Garza-Galvan (the outcome of which was subject to an election contest). Again, there are no campaign finance reports on file with the local filing authority, indicating that Vera failed to file the required reports. This indicates a failure to comply with Election Code Sections 254.063 and 254.064.

In the 2022 election cycle, Vera faces a general election opponent. As indicated by the attached exhibits, Vera is actively campaigning for re-election. Vera does not currently have a campaign treasurer appointment on file with the local filing authority, and has not filed semi-annual reports in January 2021, July 2021, or January 2022 (as required by Election Code 254.063).

Therefore, I allege the following statutory violations within the preceding two years:

1. Making expenditure without campaign treasurer on file (Election Code 252.001)
2. Failure to file July 2020 semi-annual report (Election Code 254.063)
3. Failure to file January 2021 semi-annual report (Election Code 254.063)
4. Failure to file July 2021 semi-annual report (Election Code 254.063)
5. Failure to file January 2022 semi-annual report (Election Code 254.063)

ATTACH ADDITIONAL PAGES AS NEEDED

IV. STATEMENT OF FACTS

Page 3

You must state the facts constituting the alleged violation(s), including the dates on which or the period of time in which the alleged violation(s) occurred. Identify allegations of fact not personally known to you, but alleged on information and belief. Use simple, concise, and direct statements. You must state facts that, if true, would constitute a violation of a law within the Commission's jurisdiction and allege facts to sufficiently indicate the manner and means by which each alleged violation occurred.

Please completely fill out this form.

Failure to complete this form properly will cause your complaint to be noncompliant and returned.

Eloy Vera was first elected to the office of Starr County Judge in 1998 and has been consistently re-elected since then, often facing opponents at the ballot box. However, he has no Campaign Treasurer Appointment of file (as required by Election Code 252.001), has made expenditures without a campaign treasurer on file (in violation of Election Code 253.031(a)), and has continually failed to file campaign finance reports (in violation of Election Code 254.041(a)(1)) despite raising and spending funds to facilitate his re-election.

Vera has faced opponents in 2014, 2018, and 2022. Throughout that time, Vera has disregarded the state's campaign finance reporting requirements, denying the public information as to who supported his campaign and who he paid using campaign funds. Neither the Starr County Clerk nor the Starr County Elections Administrator have a campaign treasurer appointment or any campaign finance reports relating to Vera's electoral activity (see Texas Election Code 252.005).

In the 2014 Democratic primary, Vera defeated two challengers - Lupe Amador and Guillermo Gonzalez, Jr. However, there are no campaign finance reports on file with the local filing authority, indicating that Vera failed to file the required disclosures. News media indicated the purchase of at least one political billboard (which was installed without permission on private property).

<https://www.valleycentral.com/news/local-news/county-judge-hangs-campaign-sign-on-private-property/>

This indicates a failure to comply with Election Code Sections 254.063 and 254.064.

In the 2018 Democratic primary, Vera defeated Letty Garza-Galvan (the outcome of which was subject to an election contest). Again, there are no campaign finance reports on file with the local filing authority, indicating that Vera failed to file the required reports. This indicates a failure to comply with Election Code Sections 254.063 and 254.064.

In the 2022 election cycle, Vera faces general election opponent Maria Yvette Hernandez. As indicated by the attached exhibits, Vera is actively campaigning for re-election. Vera does not currently have a campaign treasurer appointment on file with the local filing authority, and has not filed semi-annual reports in January 2021, July 2021, or January 2022 (as required by Election Code 254.063).

At least two public information requests have sought copies of Vera's CTA and campaign finance reports from the Starr County Elections Administrator; that office has responded to two separate requests that no such information is on file.

ATTACH ADDITIONAL PAGES AS NEEDED

V. LISTING OF DOCUMENTS AND OTHER MATERIALS

Page 4

You must list all documents and other materials filed with this complaint. Additionally, list all other documents and other materials that are relevant to this complaint and that are within your knowledge, including their location, if known. Relevant documents that are available to you or in your possession must be included.

Please completely fill out this form.

Failure to complete this form properly will cause your complaint to be noncompliant and returned.

Exhibits:

Photo of yard sign advocating Respondent's 2022 re-election, featuring a disclosure statement indicating that Respondent paid for the political advertising.

March 8, 2022 Public Information Request by T. Trevino seeking statutorily required reports, and May 18, 2022 response that no such documents are maintained by the filing authority.

May 5, 2022 Public Information Request by Complainant seeking statutorily required reports.

June 9, 2022, response to Complainant's record request indicating that no responsive documents are maintained by the local filing authority.

ATTACH ADDITIONAL PAGES AS NEEDED