

SWORN COMPLAINT BEFORE THE TEXAS ETHICS COMMISSION

An individual must be a resident of the state of Texas to be eligible to file a sworn complaint with the Texas Ethics Commission. The complainant is required to attach to the complaint a copy of one of the following documents:

- complainant's driver's license or personal identification certificate issued under Chapter 521 of the Transportation Code, or commercial driver's license issued under Chapter 522 of the Transportation Code; or
- a utility bill, bank statement, government check, paycheck or other government document that shows the name and address of the complainant and is dated not more than 30 days before the date on which the complaint is filed.

An individual may also be eligible to file a sworn complaint with the Texas Ethics Commission if the individual owns real property in the state of Texas. Under this provision, the complainant will be required to attach to the complaint a copy of a property tax bill, notice of appraised value, or other government document that shows the name of the complainant, shows the address of the real property in Texas, and identifies the complainant as the owner of the real property.

Please completely fill out this form. Failure to complete this form properly will cause your complaint to be noncompliant and rejected.

OFFICE USE ONLY

Docket Number

Date Hand-delivered or Date Postmarked

I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME (REQUIRED)	MS / MRS / MR Mr.	FIRST Craig	MI L.
	NICKNAME	LAST McDonald	SUFFIX
COMPLAINANT PHYSICAL ADDRESS (REQUIRED)	ADDRESS 609 W. 18 th St., Suite E	APT / SUITE #;	CITY; STATE; ZIP CODE Austin Tx 78701 <small>(Full home or business address, including street, city, state, and zip code)</small>
3 COMPLAINANT MAILING ADDRESS <input checked="" type="checkbox"/> (REQUIRED)	ADDRESS Same	APT / SUITE #;	CITY; STATE; ZIP CODE <small>(Full street or mailing address, including city, state, and zip code)</small>
4 COMPLAINANT TELEPHONE NUMBER (REQUIRED)	AREA CODE 512-472-9770	PHONE NUMBER EXT	5 COMPLAINANT E-MAIL ADDRESS (REQUIRED IF KNOWN) craig@tpj.org

II. IDENTITY OF RESPONDENT

6 RESPONDENT NAME (REQUIRED)	MS / MRS / MR Mr.	FIRST Ray	MI A.
	NICKNAME	LAST Wilkerson	SUFFIX
7 RESPONDENT POSITION OR TITLE (REQUIRED)	Chairman, Central Texas Regional Mobility Authority		
8 RESPONDENT PHYSICAL ADDRESS (REQUIRED)	ADDRESS 3300 North IH-35	APT / SUITE #; Suite 300	CITY; STATE; ZIP CODE Austin TX 78705
9 RESPONDENT MAILING ADDRESS <input checked="" type="checkbox"/> check if same as above	ADDRESS	APT / SUITE #;	CITY; STATE; ZIP CODE <small>(Full street or mailing address, including city, state, and zip code)</small>
10 RESPONDENT TELEPHONE NUMBER (REQUIRED)	AREA CODE 512-996-9778	PHONE NUMBER EXT	11 RESPONDENT E-MAIL ADDRESS (REQUIRED IF KNOWN) UNKOWN

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III. NATURE OF ALLEGED VIOLATION

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Include the specific law(s) or rule(s) alleged to have been violated. 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, 2004 of the Gov't Code; (3) § 334.025 and § 335.055 of the Local Gov't Code; (4) Subchapter C, 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; (5) § 2152.064 and § 2155.003 of the Gov't Code; (6) § 306.005 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 rejected.

Respondent appears to have violated Chapter 572 Government Code: Personal Financial Disclosure, Standards of Conduct, and Conflict of Interest.

Specifically, respondent's Personal Financial Statements covering calendar 2013 (filed with the Commission on April 24, 2014) and covering calendar 2014 (filed with the Commission on March 31, 2015) do not appear to be compliant with Sec. 572.023

Particularly it appears the respondent is not in compliance with:

Sec. 572.023 (b)(6) which states an accounting of financial activity consists of the:

"identification by description of all beneficial interests in real property and business entities held or acquired, and if sold, the category of the amount of the net gain or loss realized from the sale;" and,

Sec. 572.023 (b)(10) which states an accounting of financial activity consists of:

"a list of all boards of directors of which the individual is a member and executive positions that the individual holds in corporations, firms, partnerships, limited partnerships, limited liability partnerships, professional corporations, professional associations, joint ventures, or other business associations or proprietorships, stating the name of each corporation, firm, partnership, limited partnership, limited liability partnership, professional corporation, professional association, joint venture, or other business association or proprietorship and the position held;"

ATTACH ADDITIONAL PAGES AS NEEDED

IV. STATEMENT OF FACTS

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 the complainant, but alleged on information and belief. Please use simple, concise, and direct statements.

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Respondent's Personal Financial Statements covering calendar 2013 (filed with the Commission on April 24, 2014) and covering calendar 2014 (filed with the Commission on March 31, 2015) appear to be incomplete and therefore not in compliance with Government Code 572.

In Part 7A, respondent fails to list a number of real properties in which he appears to have an interest. County tax appraisal district records suggests that Mr. Ray Wilkerson may have a beneficial interest in five real properties that were not disclosed on Mr. Wilkerson's PFS filings covering 2013 and 2014. Those five properties are:

- 8015 Shoal Creek Blvd., Austin, TX 78757

Travis Central Appraisal District data show the property was purchased by 8015 Shoal Creek, Ltd. in 1998. Secretary of State records list Wilkerson as an Authorized Officer and Registered Agent of 8015 Shoal Creek, Ltd. They also list Wilkerson's W/M Development, Inc. as the general partner of 8015 Shoal Creek, Ltd.

- 8045 Mesa Drive, Austin, TX 78731

Travis Central Appraisal District data show the property has been owned by W/M Investments No. One - 100 East Main, Ltd. since 1996. Secretary of State records list Wilkerson as the Registered Agent of W/M Investment No. One - 100 East Main, Ltd. They list its address as Wilkerson's office at 8015 Shoal Creek. They also list Wilkerson's K LW Development, LLC as the general partner of W/M Investments No. One - 100 East Main, Ltd.

- 7425 Burnet, Austin, TX 78757

Travis Central Appraisal District data show the property has been owned by W/M Investments No. Two - Richcreek Plaza, Ltd., since 1997. Secretary of State records list Wilkerson as the Registered Agent of W/M Investment No. Two - Richcreek Plaza, Ltd. They list its address as Wilkerson's office at 8015 Shoal Creek. They also list Wilkerson's K LW Development, LLC as the general partner of W/M Investments No. Two - Richcreek Plaza, Ltd.

CONTINUED ON ADDITIONAL PAGE

ATTACH ADDITIONAL PAGES AS NEEDED

IV. STATEMENT OF FACTS (CONTINUED)

- 8440 Burnet, Austin, TX 78757
Travis Central Appraisal District data show the property has been owned by W/M Investments No. Four - Spectrum, Ltd., since 1992. Secretary of State records list Wilkerson as the Registered Agent of W/M Investment No. Four - Spectrum, Ltd. They list its address as Wilkerson's office at 8015 Shoal Creek. They also list Wilkerson's W/M Development, Inc. as the general partner of W/M Investments No. Four - Spectrum, Ltd.
- 12319 N. Mopac, Austin, TX 78758
Travis Central Appraisal District data show the property has been owned by RK Investments No. One - Plaza North, LLC, since 2008. Secretary of State records list Wilkerson as the Manager and Registered Agent of RK Investments No. One - Plaza North, LLC. They list its address as Wilkerson's office at 8015 Shoal Creek.

Additionally, Part 7B and Part 12 of Mr. Wilkerson's PFS appear to be incomplete and therefore, not compliant with Government Code 572. Records on file with the Secretary of State suggest Mr. Wilkerson may have a beneficial interest in and may serve as a director or executive with one or all of these seven Texas business entities:

- 8015 Shoal Creek, Ltd.
- W/M Investments No. One – 100 East Main, Ltd.
- W/M Investments No. Two – Richcreek Plaza, Ltd.
- W/M Investments No. Three – Walnut Ridge, Ltd.
- W/M Investments No. Four – Spectrum, Ltd.
- BCR Partnership, Ltd.
- RK Investments No. One – Plaza North, LLC.

V. LISTING OF DOCUMENTS AND OTHER MATERIALS

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.

Please completely fill out this form. Failure to complete this form properly will cause your complaint to be noncompliant and rejected.

- 1) Travis Central Appraisal District documents for 8015 Shoal Creek, LTD property at 8015 Shoal Creek Blvd., Austin, TX 78757.
- 2) Travis Central Appraisal District documents for Wilkerson/McCormick Investments property at 8045 Mesa Dr., Austin, TX 78759.
- 3) Travis Central Appraisal District documents for W/M Investment #2 - Richcreek property at 7425 Burnet Rd., Austin, TX 78757.
- 4) Travis Central Appraisal District documents for Wilkerson/McCormick Investments property at 8045 Mesa Dr., Austin, TX 78759.
- 5) Travis Central Appraisal District documents for W M Investments No. Four Spectrum property at 8440 Burnet Rd., Austin, TX 78757.
- 6) Travis Central Appraisal District documents for RK Investments No. One-Plaza North LLC property at 12319 N Mo-Pac Expressway 1, Austin, TX 78758.
- 7) Secretary of State filings for 8015 Shoal Creek, LTD.
- 8) ~~Secretary of State filings for W/M Investments No. One -100 E. Main, LTD.~~
- 9) Secretary of State filings for W/M Investments No. Two-Rickcreek Plaza, LTD.
- 10) ~~Secretary of State filings for W/M Investments No. Three -Walnut Ridge, LTD.~~
- 11) Secretary of State filings for W/M Investments No. Four-Spectrum, LTD.
- 12) Secretary of State filings for BCR Partnership, LTD.

ATTACH ADDITIONAL PAGES AS NEEDED

VI. AFFIDAVIT

BASED ON PERSONAL KNOWLEDGE

(Execute this affidavit if the acts alleged are within your direct personal knowledge.)

Please completely fill out this form. Failure to complete this form properly will cause your complaint to be noncompliant and rejected.

I, _____, complainant,
swear that I am a resident of the state of Texas. I swear that I have knowledge of the
facts alleged in this complaint and that the information contained in this complaint is
true and correct.

Signature of Complainant

AFFIX NOTARY STAMP / SEAL ABOVE

Sworn to and subscribed before me, by the said _____, this the _____ day of
(Complainant)

_____, 20 _____, to certify which, witness my hand and seal of office.

Signature of officer administering oath

Printed name of officer administering oath

Title of officer administering oath

VII. AFFIDAVIT

BASED ON INFORMATION AND BELIEF

(Execute this affidavit if the acts alleged are not within your direct personal knowledge, but are based on reasonable belief.)

I, CRAIG L. McDONALD, complainant,
swear that I am a resident of the state of Texas. I swear that I have reason to believe
and do believe that the violation alleged in this complaint has occurred. The source
of my information and belief is

documents from TRAVIS County
Appraisal District, Texas Secretary of
State, and Texas Ethics Commission filings.

Signature of Complainant

AFFIX NOTARY STAMP / SEAL ABOVE

Sworn to and subscribed before me, by the said _____, this the _____ day of
(Complainant)

_____, 20 _____, to certify which, witness my hand and seal of office.

Signature of officer administering oath

Printed name of officer administering oath

Title of officer administering oath