

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.

Effective September 1, 2009, 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.

OFFICE USE ONLY	
Docket Number	
Date Hand-delivered or Date Postmarked	

I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME	MS / MRS / MR	FIRST	MI
	NICKNAME	LAST	SUFFIX
MR. CRAIG L. M ^c DONALD			
2 COMPLAINANT PHYSICAL ADDRESS	ADDRESS	APT / SUITE #	CITY, STATE, ZIP CODE
	(Full home or business address, including street, city, state, and zip code)		
609 W. 18 th Suite E Austin TX 78701			
3 COMPLAINANT MAILING ADDRESS	ADDRESS	APT / SUITE #	CITY, STATE, ZIP CODE
	(Full home or business address, including street, city, state, and zip code)		
<input checked="" type="checkbox"/> (check if same as above)			
4 COMPLAINANT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT
	5 COMPLAINANT E-MAIL ADDRESS		
512 - 472-9770 CRAIG @ tpej.org			

II. IDENTITY OF RESPONDENT

6 RESPONDENT NAME	MS / MRS / MR	FIRST	MI
	NICKNAME	LAST	SUFFIX
MR. Michael Mike KRUSEE			
7 RESPONDENT POSITION OR TITLE	Former State Representative, District 52		
8 RESPONDENT PHYSICAL ADDRESS	ADDRESS	APT / SUITE #	CITY, STATE, ZIP CODE
	(Full home or business address, including street, city, state, and zip code)		
13231 Briar Hollow Austin TX 78729			
9 RESPONDENT MAILING ADDRESS	ADDRESS	APT / SUITE #	CITY, STATE, ZIP CODE
	(Full home or business address, including street, city, state, and zip code)		
<input checked="" type="checkbox"/> (check if same as above)			
10 RESPONDENT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT
	11 RESPONDENT E-MAIL ADDRESS (IF KNOWN)		
512 - 258-0147 Unknown			

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III. NATURE OF ALLEGED VIOLATION**Page 2**

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.

It appears that former State Representative Michael Krusee (TEC filer # 00020407) has violated § 253.035 of Title 15 of the Election Code which prohibits the conversion of political contributions to personal use.

ATTACH ADDITIONAL PAGES AS NEEDED

IV. STATEMENT OF FACTS**Page 3**

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.

Former State Representative Michael Krusee's campaign finance reports (Texas Ethics Commission C/OH, filer #00020407) covering the period January 1, 2009 through December 31, 2011 detail at least \$94,627 in expenditures which appear to have been for his personal use.

Mr. Krusee left public office on January 13, 2009 and has not been a candidate for office since. Mr. Krusee's C/OH report covering the period ending on December 31, 2008 reported that he retained \$293,119 in his campaign account at that time. Under Title 15 Mr. Krusee may not spend these funds for purposes that are not connected to the duties and activities of a candidate or an office holder. (He may contribute leftover campaign funds to candidates for public office, distribute them to recognized charities, or return them to the original contributors.)

Many of Mr. Krusee's campaign account expenditure since he left office appear to violate the prohibition against using political contributions for personal use. A partial analysis of the expenditures reveals:

- Twenty-nine entries for hotel expenses totaling \$15,318;
- 146 entries for travel expenses including payments for airfare, mileage reimbursements, taxi and public transportation totaling \$26,306;
- 150 payments for food and beverage expenses totaling \$11,419;
- Conference registration and related fees totaling \$16,236;
- More than 30 entries for what appear to be personal office items and expenses which total \$2,047; and
- Seven payments to Lindsey Hughes totaling \$23,300 for unspecified consulting services.

The above expenditures were made during a period when Mr. Krusee was neither an office holder nor candidate for public office. Under these circumstances, the payments appear to violate the Election Code.

ATTACH ADDITIONAL PAGES AS NEEDED

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.

This complaint is based on C/OH Forms filed by Michael Krusee (Filer # 00020407) with the Texas Ethics Commission covering the period January 1, 2009 through December 31, 2011.

ATTACH ADDITIONAL PAGES AS NEEDED

**VI. AFFIDAVIT
BASED ON PERSONAL KNOWLEDGE**

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

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
_____, 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

Craig L. McDonald
Signature of Complainant

AFFIX NOTARY STAMP / SEAL ABOVE

Sworn to and subscribed before me, by the said Craig L. McDonald, this the 11th day of
June, 20 12, to certify which, witness my hand and seal of office.

[Signature]
Signature of officer administering oath

JANETTE FLORES
Printed name of officer administering oath

Public Notary
Title of officer administering oath

