

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
		CRAIG	
		McDONALD	
2 COMPLAINANT PHYSICAL ADDRESS	ADDRESS	APT / SUITE #	CITY; STATE; ZIP CODE
609 W. 18th Suite E Austin TX 78701			
(Full home or business address, including street, city, state, and zip code)			
3 COMPLAINANT MAILING ADDRESS	ADDRESS	APT / SUITE #	CITY; STATE; ZIP CODE
<input checked="" type="checkbox"/> (check if same as above)			
(Full home or business address, including street, city, state, and zip code)			
4 COMPLAINANT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT
512		472.9770	
5 COMPLAINANT E-MAIL ADDRESS		CRAIG@tpj.org	

II. IDENTITY OF RESPONDENT

6 RESPONDENT NAME	MS / MRS / MR	FIRST	MI
	NICKNAME	LAST	SUFFIX
		William	
		Lindquist	
7 RESPONDENT POSITION OR TITLE	Treasurer, WCS - Texas Solution PAC		
8 RESPONDENT PHYSICAL ADDRESS	ADDRESS	APT / SUITE #	CITY; STATE; ZIP CODE
5430 LBJ Freeway Ste 1700 DALLAS TX 75240-2697			
(Full home or business address, including street, city, state, and zip code)			
9 RESPONDENT MAILING ADDRESS	ADDRESS	APT / SUITE #	CITY; STATE; ZIP CODE
<input checked="" type="checkbox"/> (check if same as above)			
(Full home or business address, including street, city, state, and zip code)			
10 RESPONDENT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT
972		233.1700	
11 RESPONDENT E-MAIL ADDRESS (IF KNOWN)		UNKNOWN	

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III. Nature of Alleged Violations

- 1) Respondent William Lindquist, Treasurer of WCS-Texas Solution PAC, a general purpose-committee established in June 2011, appears to have made or authorized 18 political contributions to Texas office holders between October 8 and December 13, 2011 totaling \$65,000. These contributions appear to violate Section 253.037 of the Texas Election Code. It restricts a general-purpose committee from making or authorizing political contributions and expenditures unless the committee has accepted political contributions from at least 10 people.

Just one contributor provided all of the \$100,100 that WCS PAC raised throughout 2011, according to the disclosures that the PAC filed with the Commission on July 15, 2011 and January 15, 2012. That lone contributor was Harold Simmons of Dallas, who gave WCS PAC \$100,100 on September 21, 2011. WCS PAC reported no unitemized political contributions during 2011.

- 2) It appears that WCS PAC's July 15, 2011 campaign report was filed and sworn to by an unauthorized person. The filing appears to be signed by Charles B. McDonald, who is neither the campaign treasurer nor the assistant campaign treasurer.

This filing appears to violate the following Ethics Commission Rules:

§ 20.405. Campaign Treasurer Appointment for a General-Purpose Political Committee

(c) With the exception of the campaign treasurer appointment, the individual named as a committee's campaign treasurer is legally responsible for filing all reports of the general-purpose committee, including a report following the termination of his or her appointment as campaign treasurer.

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IV. Statement of Facts

Respondent William J. Lindquist was appointed Treasurer of a general-purpose committee named WCS-Texas Solution PAC on June 21, 2011. Hal J. Harris was designated the committee's Assistant Campaign Treasurer. TEC assigned the committee filer number 67553.

In its first disclosure report filed on July 15, 2011 WCS PAC reported that it received no political contributions and made no political expenditures during the period June 21, 2011 through June 30, 2011. Charles B. McDonald, who is not the committee's designated Treasurer or Assistant Treasurer, filed that report.

WCS PAC's second disclosure report covers from July 1, 2011 through December 31, 2011. It lists a single political contribution from Harold Simmons of Dallas for \$100,100 on September 21, 2011. That report lists no unitemized political contributions. The same report discloses a total of \$65,000 in political contributions to 18 Texas office holders.

WCS PAC Contributions in 2011

Amount	Date	Recipient
\$10,000	10/6/11	Kelly Hancock
\$10,000	10/6/11	Juan 'Chuy' Hinojosa
\$10,000	12/20/11	Kelton G. Seliger
\$5,000	10/6/11	Cindy G. Burkett
\$5,000	10/6/11	Michael 'Tuffy' Hamilton
\$2,500	10/19/11	Dennis H. Bonnen
\$2,500	10/6/11	Byron Curtis Cook
\$2,500	10/6/11	Myra E. Crownover
\$2,500	12/9/11	Drew Darby
\$2,500	10/10/11	Charles L. Geren
\$2,500	10/27/11	Todd A. Hunter
\$2,500	10/6/11	Sidney C. Miller
\$2,500	10/6/11	Richard 'Wayne' Smith
\$1,000	12/15/11	Daniel Branch
\$1,000	11/4/11	Jessica Farrar
\$1,000	11/15/11	John M. Frullo
\$1,000	10/6/11	Patricia F. Harless
\$1,000	10/6/11	Marc A. Veasey
\$65,000	TOTAL	

It appears that the \$65,000 in political contributions that WCS PAC reported were unauthorized under Section 253.037 of the Texas Election Code. The committee's own filings indicate that it had not received contributions from 10 persons at the time that it made these political contributions.

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**VI. AFFIDAVIT
BASED ON PERSONAL KNOWLEDGE**

(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 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 filed with the
Texas Ethics Commission.

Craig McDonald
Signature of Complainant

AFFIX NOTARY STAMP / SEAL ABOVE

Sworn to and subscribed before me, by the said Craig McDonald, this the 21st day of
February, 2012, to certify which, witness my hand and seal of office.

[Signature]
Signature of officer administering oath

JANETE FLORES
Printed name of officer administering oath

NOTARY PUBLIC
Title of officer administering oath

