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GEORGE A. STAPLES
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April 28, 2015

Hon. Laura Maczka, Mayor and City Council
City of Richardson
411 W. Arapaho Rd., Richardson, TX 75080-4551

Re: April 8, 2015, Appointment as Outside Counsel to Investigate Complaints Filed
Pursuant to Richardson Code of Ethics

Dear Mayor Maczka and Councilmembers:

Pursuant to the appointment received from Richardson City Attorney, Pete Smith, referenced above, I have reviewed four complaints enclosed herewith together with any clarifications received.

The Code of Ethics is contained in Article I of Chapter 2 of the Richardson Code of Ordinances. It is very similar to Chapter 171 of the Texas Local Government Code in that it prohibits participation in a decision, if a councilmember or his family (e.g. parent, spouse, sibling, child, father and mother-in-law, son and daughter-in-law, grandparents, or grandchildren) has a substantial interest in a business entity or in real property. The Code of Ethics defines a "substantial interest" in essentially the same terms as Section 171.002, Texas Government Code:

- (1) ownership of ten percent or more of the voting stock or shares of the business entity affected by the decision, or ownership of ten percent or more or \$15,000 or more of the fair market value of a business entity; or
- (2) if funds received by a person from the business entity exceed 10 percent of that person's gross income for the previous year; or
- (3) ownership of an interest worth \$2,500 or more in real property, and it is reasonably foreseeable that an action on a matter involving the real property will have a special economic effect on the value of the real property distinguishable from its effect on the public.

The Code of Ethics is broader than Chapter 171, in that it prohibits representation by councilmembers of themselves or others before the City Council or City boards, prohibits acceptance of any gift from any person that might reasonably tend to influence such officer in the discharge of such person's official duties with exceptions for campaign contributions and other stated matters, and prohibits voting on any land use matter if the Councilmember owns land within 200 feet. A copy of the Code of Ethics is provided with this report.

As with Chapter 171, the Code of Ethics requires disclosure by affidavit filed with the record keeper of the board involved, describing the nature and extent of the substantial interest and mandates abstention from participation in the proceedings.

In addition to prohibiting City Councilmembers from participating in certain matters involving a substantial interest, Code of Ethics Sec. 2-4 and City Charter Sec. 21.01 also prohibit City Councilmembers from having a direct or indirect "financial interest" in any contract with the City. The meaning of the phrase "financial interest" contemplated under Sec. 2-4 and the City Charter requires that such person receive an actual financial benefit from the transaction with the city. An actual financial benefit from the transaction includes the following:

- (1) An ownership in the entity transacting business with the city where the ownership interest is more than ten percent.
- (2) Compensation as an employee, officer or director of the entity transacting business with the city where such compensation is affected by the entity's transaction with the city.

Complaints of a violation of the Code of Ethics require a sworn statement on a city form filed with the City Secretary. The complaint must describe in detail the act or acts complained of and state the specific section of the Code of Ethics that was violated. If it is determined by the City Attorney that a criminal violation may exist, he is to refer the matter to the appropriate law enforcement agency. The City Attorney or his designee is to review the facts alleged and determine whether they could allege a violation of the Code of Ethics and notify the Mayor and City Council of the existence and nature of the complaint. When a vague complaint or one lacking in detail is received, the complainant is to be contacted to request written clarification. If the complainant fails to provide written clarification, or if after written clarification is provided, it is the opinion of the attorney that the complaint is insufficient in detail and/or fails to allege a prima facie violation of the Code of Ethics, a written report to that effect shall be submitted to the City Council. A prima facie violation allegation would be one in which some facts supported by some evidence of a violation are stated.

After an initial review of the complaints, it was my opinion that they failed to allege a violation of the Code of Ethics and did not contain any evidence which would constitute a violation, were vague and lacked detail. Pursuant to the requirements of the Code of Ethics, a request was made to each complainant for clarification. The only two responses received did not provide any clarification or evidence of a violation. The complaints were written in the form of an affidavit, but failed to meet the basic requirements of an affidavit, to state that facts contained were true and correct and based upon personal knowledge. Instead of stating or demonstrating the personal knowledge of the affiant, or the truth of any fact which would constitute a violation of the Code of Ethics, the complaints ask the city to investigate violations based upon speculation, conjecture, and the status of past and future personal relationships. The complaints also lack sufficient detail as to identify a prohibited substantial interest or financial interest by the Mayor or City Council, which existed at the time the Mayor and City Council took any action relating to the Palisades development. Some allegations, such as the Mayor's intended declination of her 2015 term as Mayor, or the influence by the Mayor on other Councilmembers,

or their knowledge of or participation in her decision not to accept the office of Mayor are simply not violations of the Code of Ethics. Furthermore, general complaints based upon speculation and conjecture related to allegedly inappropriate past or future “personal relationships” are not sufficient to invoke the investigation procedures of the Code of Ethics.

A reference in one of the responses to recently revealed email between the Mayor and the developer could be regarded as an attempt to raise the issue of whether what appears to be a personal relationship and an attempt to assist the developer get his zoning could be a violation of the Code of Ethics in view of the first sentence of Section 2-1 of the Code:

“It is hereby declared to be the policy of the city that the proper operation of democratic government requires that public officials be independent, impartial and responsible only to the people of the city; that no officer shall permit any interest, financial or otherwise, direct or indirect, or engagement in any business, transaction or professional activity to conflict with the proper discharge of such person's duties in the public interest; that public office not be used for personal gain; and that the city council at all times shall be maintained as a nonpartisan body.”

This sentence is in the “purposes” portion of the Code of Ethics; it is not a defined violation under that Code. There is no violation defined which makes it an offense to favor one side or the other in a matter brought to the City Council for a vote. Personal relationships are not prohibited, nor is there a requirement for abstention from voting unless financial or familial relationships defined in the Code of Ethics and stated in Page 1 of this report are involved.

One might also question whether the provisions of Section 2-4(h) might be implicated had the complaints raised that issue. That Section of the Code of Ethics defines a violation as:

“Engage in any outside activities which will conflict with or will be incompatible with such person's official position or duties as an officer of the city.”

The duties of the Mayor are defined in the Charter and she took an oath of office. Neither establishes a duty which would be violated by her actions of communicating with or supporting or opposing the application of a zoning proponent. Zoning is a political issue, and there is no requirement that the Mayor or a member of the council refrain from communications with the proponents or opponents of any zoning decision. The activities evidenced by the email do not reflect any activity which would be incompatible with the Mayor's official position or duties as an officer of the City at the time they were taken.

All of the actions of the Mayor with respect to voting occurred prior to October of 2014. None of the complaints present any evidence of facts required by the Code of Ethics which would have required abstention from voting during the relevant time periods. None of the complaints or other matters which have come to light involving emails provide any allegations or evidence regarding a substantial interest of the Mayor or acceptance of any gift prohibited by the Code of Ethics prior to the time the Mayor voted on any matter involving the developer.

April 28, 2015

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It is my opinion that the complaints are insufficient in detail and fail to allege a prima facie violation of the Code of Ethics. Unless other complaints on this matter are received that contain sufficient facts to invoke the investigation procedures of the Code of Ethics, there is no further action on this matter to be taken by our firm or by the City Council.

Copies of the Code of Ethics, the complaints and my communications to the complainants, along with any further communications from complainants are enclosed herewith.

We appreciate the trust and confidence Mr. Smith has in our work and are happy to be of service.

Yours truly,

A handwritten signature in black ink, appearing to read "G. Staples", written over the typed name.

George Staples

GAS/kh
Enclosures

ARTICLE I. - CODE OF ETHICS

Sec. 2-1. - Purpose.

It is hereby declared to be the policy of the city that the proper operation of democratic government requires that public officials be independent, impartial and responsible only to the people of the city; that no officer shall permit any interest, financial or otherwise, direct or indirect, or engagement in any business, transaction or professional activity to conflict with the proper discharge of such person's duties in the public interest; that public office not be used for personal gain; and that the city council at all times shall be maintained as a nonpartisan body. To implement such a policy, the city council deems it advisable to enact a code of ethics for officials, as defined in this article, whether elected or appointed, paid or unpaid, to serve not only as a guide for official conduct of the city's public servants, but also as a basis for discipline for those who refuse to abide by its terms, the overriding interest being that such officers of the city shall at all times strive to avoid even the appearance of impropriety.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-2. - Title; application.

- (a) This section shall be known as the code of ethics.
- (b) This code of ethics shall apply to all officials as defined in this article.
- (c) This code of ethics does not apply to employees, including those individuals employed on a full-time, part-time or internship basis (including those who may serve on a city board, committee or commission) nor to independent contractors of the city. The standards of conduct for employees are governed by the City of Richardson Personnel Policies and the City Charter.
- (d) This code of ethics applies to members of all city boards, committees or commissions as defined in this article.
- (e) This code of ethics applies to the conduct or actions of public officers, as defined in this article which occurs in whole or in part after the date of adoption of this article.
- (f) This code of ethics applies to officers only while such persons hold such position or office.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-3. - Definitions.

The following words, terms and phrases, when used in this article, shall have the meanings ascribed to them in this section, except where the context clearly indicates a different meaning:

Benefit means anything reasonably regarded as pecuniary or economic gain or pecuniary or economic advantage, including benefit to any other person in whose welfare the beneficiary has a direct and substantial interest.

Business entity means any person, entity, corporation (whether for-profit or nonprofit), general or limited partnership, sole proprietorship, joint venture, unincorporated association or firm, institution, trust, foundation, holding company, joint-stock company, receivership, or other entity recognized by law, whether or not organized for profit, which has an economic interest, or seeking such, in conducting business with the city. Business entity also includes any business entity that represents a party conducting or seeking to conduct business with the city.

City means the City of Richardson, Texas.

City council means the governing body of the city.

Confidential information means any information to which an official has access in such person's official capacity which may not be disclosed to the public except pursuant to state and/or federal law and which is not otherwise a matter of public record or public knowledge. Confidential information includes the following information, however transmitted: (i) any information from a meeting closed to the public pursuant to the Texas Open Meetings Act or other law regardless of whether disclosure violates the Texas Open Meetings Act or Texas Public Information Act; (ii) any information protected by attorney client, attorney work product, or other applicable legal privilege; and (iii) any information deemed confidential by law.

Contract means any lease, claim, account or demand against or agreement with any entity or person, whether express or implied, executed or executory, oral or written.

Corporation means any corporation that has a board of directors appointed in whole or in part by the city council that is operating under the direct authority of or subject to the direct control of the city council.

Employee means any person employed by the city, including those individuals on a part-time or internship basis, but does not include independent contractors.

Gift means anything of value, regardless of form, offered or given in the absence of adequate and lawful consideration. It does not include the receipt or acceptance of campaign contributions which are regulated by federal, state and/or local laws or ordinances.

Knowingly means a person acts knowingly, or with knowledge, with respect to the nature of the person's conduct or to circumstances surrounding the conduct when the person is aware of the nature of the conduct or that the circumstances exist. A person acts knowingly, or with knowledge, with respect to a result of the person's conduct whether the person is aware that the conduct is reasonably certain to cause the result.

Officer or official means any member of the city council and any appointed member of a city board, commission or committee established by ordinance, Charter, state law or otherwise, on a temporary or permanent basis, operating either under the direct or indirect authority or subject to either the direct or indirect control of the city council. Such term includes but is not limited to the members of the city plan commission, the board of adjustment, the building and standards commission, the tax increment reinvestment financing zone boards of directors, the civil service board and appeals board, the library board, the parks and recreation board, the arts commission, animal shelter advisory board, the environmental advisory commission. Such term also includes the members of the boards of directors of corporations, such as the Richardson Improvement Corporation.

Relative means any person related to an officer within the second degree by consanguinity or affinity. This relationship includes the spouse, parents, children, stepchildren, father and mother-in-law, or son and daughter-in-law, grandparents, grandchildren, sisters and brothers of the officer.

Special privileges means a right, advantage or favor of or for a particular person, occasion or purpose not otherwise available to others.

Substantial interest means: (i) the ownership of ten percent or more of the voting stock or shares of a business entity; (ii) the ownership of ten percent or more, or \$15,000.00 or more of the fair market value of a business entity; or (iii) funds received from the business entity exceed ten percent of the person's gross income for the previous year, and action on the matter involving the business entity will have a special economic effect on the business entity that is distinguishable from the effect on the public. It is expressly provided herein that an investment or ownership in a publicly held company, in an amount less than \$15,000.00 does not constitute a substantial interest. Substantial interest in real property means the person has an interest in the real property that is equitable or legal ownership with a fair market value of \$2,500.00 or more; and it is reasonably foreseeable that an action on a matter involving the real property will have a special economic effect on the value of the real property distinguishable from its effect on the public. (Ownership includes any partnership, joint or corporate ownership or any equitable or beneficial interest as a beneficiary of a trust.) An officer is considered to have a substantial interest under this code of ethics if a person related to the officer in the second degree of consanguinity or affinity has a substantial interest under this code of ethics.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-4. - Standards of conduct.

No officer of the city or a relative thereof shall:

- (a) Have a financial interest, direct or indirect, in any contract with the city, nor shall such person be financially interested, directly or indirectly, in the sale to the city of any land, or rights or interest in any land, materials, supplies or service. The "financial interest" contemplated under this section and under the City Charter section 21.01 requires that such person receive an actual financial benefit from the transaction with the city. An actual financial benefit from the transaction shall include:
 - (1) An ownership in the entity transacting business with the city where the ownership interest is more than ten percent.
 - (2) Compensation as an employee, officer or director of the entity transacting business with the city where such compensation is affected by the entity's transaction with the city.
- (b) Participate in a vote or decision on any matter in which the officer has a substantial interest.
- (c) Represent or appear in behalf of private interests of others before the city council, or any agency, board, commission, corporation, or committee of the city, nor shall represent any private interests of others in any action or proceeding involving the city, nor voluntarily participate on behalf of others in any litigation to which the city is, or might be, an adverse party. The restrictions of this subsection 2-4(c) do not prohibit an officer, or relative of an officer, who is the president, vice president or officer of a homeowner's association from appearing before the city council, or any agency, board, commission, or committee of the city to represent such homeowner's association, except that no such officer or relative of such officer shall appear before the agency, board, commission or committee of the city of which such officer is a member.
- (d) Accept any gift from any person that might reasonably tend to influence such officer in the discharge of such person's official duties. The prohibition against gifts shall not apply to:
 - (1) A lawful campaign contribution;

- (2) An honorarium in consideration for services unless the officer would not have been asked to provide the services but for the officer's position;
 - (3) Meals, lodging, transportation in connection with services rendered by the officer at a conference, seminar or similar event that is more than merely perfunctory;
 - (4) Complimentary copies of trade publications and other related materials;
 - (5) Attendance at hospitality functions at local, regional, state or national association meetings and/or conferences;
 - (6) Any gift which would have been offered or given to the person if such person was not an officer or employee of the city;
 - (7) An occasional item with a value less than \$50.00;
 - (8) Tee shirts, caps and other similar promotional material;
 - (9) Meals, transportation and lodging in connection with a seminar or conference at which the officer is providing services;
 - (10) Gifts on account of kinship or a personal, or professional, or business relationship independent of the officer's status;
 - (11) Complimentary attendance at political or charitable fundraising events; and
 - (12) Meals, lodging, transportation, or entertainment furnished in connection with public events, appearances or ceremonies related to official city business, if furnished by the sponsor of such public events.
- (e) Use such person's official position to secure special privileges or benefits for such person or others.
 - (f) Grant any special consideration, treatment or advantage to any citizen, individual, business organization or group beyond that which is normally available to every other citizen, individual, business organization or group.
 - (g) Disclose confidential information.
 - (h) Engage in any outside activities which will conflict with or will be incompatible with such person's official position or duties as an officer of the city.
 - (i) Use city supplies, personnel, property, equipment or facilities (whether tangible or intangible) for any purpose other than the conduct of official city business, unless otherwise provided for by law, ordinance or city policy.
 - (j) Act as a surety on any official bond required for any officer or employee of the city, or for a business that has a contract, work or business with the city.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-5. - Additional standards.

- (a) No member of the city council who is on the board of a nonprofit organization may vote on any funding request by that nonprofit organization, unless the nonprofit organization has a board of directors or trustees appointed in whole or in part by the city council.
- (b) With the exception of those proceedings allowed under this article, no member of the city council shall personally appear in such person's own behalf before the city council, or any city board, commission, corporation or committee but may designate and be represented by a person of such person's choice in any such personal matter.
- (c)

No member of the city council, the city plan commission, or board of adjustment shall participate in, or vote on, any land use matter in which such officer has a substantial interest in any real property within 200 feet of the real property, the subject of the land use matter. For purposes of this subsection 2-5(c) "land use matter" shall mean zoning, plat approval, site plan or other development approvals or permits, variances or exceptions. The term "land use matter" does not include studies or similar matters that are for the benefit of the city and which are not unique to real property within 200 feet of the real property, the subject of the land use matter, in which the officer has a substantial interest.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-6. - Disclosure of substantial interest.

Any officer, who has a substantial interest in any matter pending before the body, board, commission, corporation or committee of which the officer is a member, before a vote or decision on such matter, shall file an affidavit stating the nature and extent of the substantial interest, and shall abstain from further participation in such matter. The affidavit shall be on a form provided by the city and must be filed with record keeper for such body, board, commission, corporation or committee.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-7. - Complaints against officers.

- (a) All complaints or allegations of a violation of this code of ethics against an officer shall be made in writing on a form provided by the city, sworn to before a notary public, and filed of record with the city secretary. Such complaint shall describe in detail the act or acts complained of and the specific section(s) of this code of ethics alleged to have been violated. A general complaint lacking in detail shall not be sufficient to invoke the investigation procedures contained herein; and anonymous complaints shall not be considered. The city secretary shall provide a copy of the complaint to the affected officer and the city council, and immediately refer the complaint to the city attorney, who shall initially review the complaint to determine if the complaint contains sufficient detail and alleges a violation of the code of ethics. The affected officer may file a written response to the complaint within seven business days after the complaint is filed with the city secretary, who shall forward the response, if any, to the city attorney.
- (b) The city attorney shall submit a written report to the city council as soon as possible but not later than 15 business days after the receipt of the complaint, unless an extension is granted by a majority of the non-implicated city council members. The city attorney may contact the complainant, interview witnesses and examine any documents necessary for the report. Such report shall be comprehensive and explain in detail all facts, findings, and conclusions in support of the city attorney's opinion as to whether or not a violation of this code of ethics occurred. When the city attorney receives a vague complaint or one lacking in detail, the city attorney shall contact the complainant to request a written clarification. If the complainant fails to provide the city attorney with written clarification, or if after written clarification is provided, it is the opinion of the city attorney that the complaint is insufficient in detail and/or fails to allege a prima facie violation of the code of ethics, a written report to that effect shall be submitted to the city council. If the city attorney determines that a criminal violation may exist, the city attorney shall refer the matter to the appropriate law enforcement agency.
- (c) If it is determined by the city attorney that the facts as alleged could constitute a violation of this code of ethics, then the city attorney shall, within 15 business days after receipt of the complaint, notify the mayor and city council members of the existence and nature of the complaint. The city council shall

cause a meeting to convene, whether regular or special, within 15 business days after being so notified by the city attorney to further consider said complaint in executive session with mayor or any three members of the city council (excluding the mayor) causing such a meeting to be convened. In any event, the city attorney shall immediately proceed to fully investigate the alleged improprieties. For purposes of this investigation, the city attorney shall have all of the powers of investigation as are given to the city council by reason of the City Charter and shall report back to the city council as soon as possible but in no event more than 15 business days from the date of notification of the city council unless an extension is granted by the city council. Said report shall be comprehensive and explain in detail all facts, findings and conclusions in support of the city attorney's opinion as to whether a violation of this code of ethics occurred.

- (d) The city council shall consider the complaint and the city attorney's report at an executive session of the city council. The affected officer may request that the complaint be considered in a public meeting. At such meeting, the city attorney shall present a written report to the city council describing in detail the nature of the complaint and the city attorney's findings and conclusions as to a possible violation of this code of ethics. The affected officer shall have the right to a full and complete hearing before the city council with the opportunity to call and cross-examine witnesses and present evidence in such person's behalf. The non-implicated city council members in attendance shall conduct a hearing and review the complaint. The city council may reject the complaint or take action authorized under section 2-8, violations.
- (e) No action or decision with regard to the complaint shall be made except in a meeting which is open to the public.
- (f) The city council may appoint outside legal counsel, or may direct the city attorney to appoint outside legal counsel, or the city attorney in the city attorney's discretion, may appoint outside legal counsel, to perform the duties and responsibilities of the city attorney under subsections (b), (c) and (d) of this section.
- (g) A complaint or allegation of a violation of this article may only be made against an officer while such person holds such position or office. A complaint made against an officer pursuant to this section shall be processed and resolved even if such person resigns from, or ceases to hold such position or office, prior to resolution of the complaint.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-8. - Violations.

The city council may take any one or more of the following actions in an open meeting concerning a complaint:

- (1) Issue a statement finding the complaint is totally without merit, brought for the purpose of harassment, or brought in bad faith.
- (2) Issue a letter of notification when the violation is unintentional. A letter of notification shall advise the officer of any steps to be taken to avoid future violations.
- (3) Issue a letter of admonition when the violation is minor or may have been unintentional, but calls for a more substantial response than a letter of notification.
- (4) Issue a reprimand when a violation has been committed knowingly or intentionally.
- (5) Remove from office an officer, other than a city council member, for a serious or repeated violation of this code of ethics. Removal shall be, to the extent by and allowed, in compliance with the Charter and state law.

- (6) Pass a resolution of censure or a recommendation of recall when the city council finds that a serious or repeated violation of this code of ethics has been committed intentionally by a member of the city council.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-9. - Interpretation of content.

Any officer may request and the city attorney shall issue, a verbal or written opinion (as deemed appropriate) concerning the meaning or effect of any section, word, or requirement of this code of ethics as it affects such person.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-10. - Review.

The city council shall review this article once every two years following its adoption on September 27, 2010.

(Ord. No. 3785, § 1, 9-27-10)

Secs. 2-11—2-25. - Reserved.

CODE OF ETHICS COMPLAINT FORM

Name of Official alleged to have violated the Code of Ethics: *Laura Maczka, Bob Townsend, Mark Solomon, Scott Dunn*
Specific section (i.e., 2-4 or 2-5) of the Code of Ethics alleged to have been violated: *Sec. 2-4, 2-6*

Paul Voelke, Steve Mitchell

Dated filed with the City Secretary:

In the Affidavit below, please describe in detail the act or acts which are the factual basis for your complaint that the above-named City officer has violated the section(s) of the Code of Ethics identified above. If you believe multiple violations have occurred, please describe in detail the act or acts which support each violation set out in your complaint:

AFFIDAVIT

STATE OF TEXAS §
COUNTY OF DALLAS §

BEFORE ME, the undersigned authority, on this day personally appeared *Will Silveathum*, who, being by me first duly sworn, stated under oath the following:

The relationship between Mayor Laura Maczka and Developer Mark Jordan prior to the rezoning vote of the Palisades Development. The potential conflict of interest before the final vote on the Palisades Development. An investigation should also occur to determine the city council's knowledge of the relationship between the Mayor and Mark Jordan prior to the final vote. It should be determined whether Mayor Maczka influenced votes of any other council members. An investigation should occur to determine Mayor Maczka gaining employment to J.P. Partners after the rezoning had passed. The timing of Mayor Maczka resignation should be investigated to determine if it was deliberate to have a self appointed Mayor by the city council. In summary the following statements should be investigated fully:

- 1. The Mayor is alleged to possibly have had a relationship with Mark Jordan during the Palisades rezoning in which she held a vote and potentially could have persuaded council members.*
- 2. The Mayor has benefitted from her dealings with Mark Jordan while Mayor and is now employed by his company.*

*If additional space is needed, please attach continuation forms numbered in sequence as necessary.

CODE OF ETHICS COMPLAINT FOR CONTINUATION SHEETS

- 3. The city council potentially had knowledge of her relationship with Mark Jordan prior to the final vote and it turns would be guilty of ethical violations.
- 4. The Mayor could potentially benefit greatly from the development deal if her and Mark Jordan were to be married at a later date.
- 5. The conflict of interest and questions citizens have should lead to the immediate resignation of the mayor which leads the citizens to believe there is strategy behind her resignation.

Will Swentlow
 COMPLAINANT (AFFIANT)
 Address: 2214 Ridge Crest Dr.
Richardson, TX 75080
 Telephone #: 214-334-4658

STATE OF TEXAS §
 COUNTY OF DALLAS §

SUBSCRIBED AND SWORN BEFORE ME on the 7th day of April, 2015



Savannah Lee Wood
 Notary Public, State of Texas
 Printed Name: Savannah Wood
 My Commission Expires: 02/09/2016

CODE OF ETHICS COMPLAINT FORM

Name of Official alleged to have violated the Code of Ethics:	Laura Maczka
Specific section (i.e., 2-4 or 2-5) of the Code of Ethics alleged to have been violated:	Sec. 2.4 Standards of Conduct
Dated filed with the City Secretary:	
In the Affidavit below, please describe in detail the act or acts which are the factual basis for your complaint that the above-named City officer has violated the section(s) of the Code of Ethics identified above. If you believe multiple violations have occurred, please describe in detail the act or acts which support each violation set out in your complaint:	
<u>AFFIDAVIT</u>	
STATE OF TEXAS	§
COUNTY OF DALLAS	§
BEFORE ME, the undersigned authority, on this day personally appeared William P. Hardeman, who, being by me first duly sworn, stated under oath the following:	
I am making the complaint to the city of Richardson against Mayor Laura Maczka for violations of the City's Code of Ethics for Standard of Conduct. Specifically regarding behavior relating to an inappropriate business and personal relationship with Mark Jordan, who is a lead developer in the Palisades development in which zoning change votes were made over the course of the 2013 and 2014 years.	
Allegations are that Maczka began this inappropriate relationship prior to a final zoning vote that raised a number of multi-family units from an originally zoned 340 (approx.) units to over 1000 units.	
Although this complaint is made against Mayor Laura Maczka, I also believe the timing of Maczka's filing of a Conflict of Interest statement on March 19th with the city, when she disclosed her continued professional relationship with Mark Jordan, who also filed a reciprocal COI statement and her declaration of not continuing as Mayor after the May 9th municipal elections, are suspect of not only her actions, but those of the entire City Council. This timing seems all too convenient, preventing other candidates from being able to meet the deadline to file for the Mayor's place and run in the May 9th election. This of course leaves the decision of Maczka's replacement to the current council to select the city's next Mayor. One council member has stated that he knew of this conflict as early as February 2015. I believe others knew as early as December 2014.	
*If additional space is needed, please attach continuation forms numbered in sequence as necessary.	

CODE OF ETHICS COMPLAINT FOR CONTINUATION SHEETS

This leave the questions of motive, etc. which lend itself to a lot of conjecture as to the personal relationship between Maczka and Jordan. Conjecture does place this relationship as beginning prior to the final zoning vote in 2014. Facts related to this are final divorce decrees for both Maczka and Jordan. This would also cause this personal relationship to effect her professional deoprtment as Mayor of the city, especially with regard to the zoning votes involving Jordan and his business interests.

I voted for Maczka as a candidate for Mayor due to her public stance of being against additional multi unit expansion. I also attended a city council meeting with the Jordan Palisades property zoning question being heard and voted upon. This meeting was stated as having one of the largest citizen turnouts. Maczka stated in that meeting the she heard the voice of the citizens, but did not agree. She then voted with Mark Jordan's proposed additional request. I believe at this point she had undue influence over the voting decisions of the other council members.

William P. Henderson

COMPLAINANT (AFFIANT)

Address: 2406 Grandview Drive

Richardson, Texas 75080

Telephone #: 469-744-2224

STATE OF TEXAS §

COUNTY OF DALLAS §

Collin

SUBSCRIBED AND SWORN BEFORE ME on the 9 day of April, 2015.



Sharla R Gunn

Notary Public, State of Texas

Printed Name: Sharla R Gunn

My Commission Expires: 2 8-17

CODE OF ETHICS COMPLAINT FORM

Name of Official alleged to have violated the Code of Ethics:	Laura Maczka
Specific section (i.e., 2-4 or 2-5) of the Code of Ethics alleged to have been violated:	Sec. 2.4 Standards of Conduct
Dated filed with the City Secretary:	
In the Affidavit below, please describe in detail the act or acts which are the factual basis for your complaint that the above-named City officer has violated the section(s) of the Code of Ethics identified above. If you believe multiple violations have occurred, please describe in detail the act or acts which support each violation set out in your complaint:	
<u>AFFIDAVIT</u>	
STATE OF TEXAS	§
COUNTY OF DALLAS	§
<p>BEFORE ME, the undersigned authority, on this day personally appeared <u>Sharon K. Hardeman</u>, who, being by me first duly sworn, stated under oath the following:</p>	
<p>I am making the complaint to the city of Richardson against Mayor Laura Maczka for violations of the City's Code of Ethics for Standard of Conduct. Specifically regarding behavior relating to an inappropriate business and personal relationship with Mark Jordan, who is a lead developer in the Palisades development in which zoning change votes were made over the course of the 2013 and 2014 years.</p>	
<p>Allegations are that Maczka began this inappropriate relationship prior to a final zoning vote that raised a number of multi-family units from an originally zoned 340 (approx.) units to over 1000 units.</p>	
<p>Although this complaint is made against Mayor Laura Maczka, I also believe the timing of Maczka's filing of a Conflict of Interest statement on March 19th with the city, when she disclosed her continued professional relationship with Mark Jordan, who also filed a reciprocal COI statement and her declaration of not continuing as Mayor after the May 9th municipal elections, are suspect of not only her actions, but those of the entire City Council. This timing seems all too convenient, preventing other candidates from being able to meet the deadline to file for the Mayor's place and run in the May 9th election. This of course leaves the decision of Maczka's replacement to the current council to select the city's next Mayor.</p>	
<p>*If additional space is needed, please attach continuation forms numbered in sequence as necessary.</p>	

CODE OF ETHICS COMPLAINT FOR CONTINUATION SHEETS

This leave the questions of motive, etc. which lend itself to a lot of conjecture as to the personal relationship between Maczka and Jordan. Conjecture does place this relationship as beginning prior to the final zoning vote in 2014. Facts related to this are final divorce decrees for both Maczka and Jordan. This would also cause this personal relationship to effect her professional deportment as Mayor of the city, especially with regard to the zoning votes involving Jordan and his business interests.

Shir Hand

COMPLAINANT (AFFIANT)

Address: 2406 Grandview Drive

Richardson, Texas 75080

Telephone #: 972-800-1922

STATE OF TEXAS §
COUNTY OF DALLAS §

Collin

SUBSCRIBED AND SWORN BEFORE ME on the 9 day of April, 2016.



Sharla R Gunn

Notary Public, State of Texas

Printed Name: SHARLA R GUNN

My Commission Expires: 2-8-17



6000 WESTERN PLACE, SUITE 200
1-30 AT BRYANT IRVIN ROAD
FORT WORTH, TEXAS 76107
EMAIL: TOASE@TOASE.COM

TAYLOR·OLSON·ADKINS·SRALLA·ELAM
ATTORNEYS & COUNSELORS

TELEPHONE: (817) 332-2580
TOLL FREE: (800) 318-3400
FACSIMILE: (817) 332-4740
WEBSITE: WWW.TOASE.COM

GEORGE A. STAPLES
gstaples@toase.com

April 9, 2015

Mr. Will Silverthorn
2214 Ridge Crest Drive
Richardson, Texas 75080

Re: Ethics Complaint Dated April 7, 2015

Dear Mr. Silverthorn:

Pursuant to Section 2-7(f) of the Richardson Code of Ordinances, Mr. Pete Smith has engaged me to perform his duties concerning investigation of complaints under the Richardson Code of Ethics. This letter is in response to your complaint filed April 7, 2015.

The Code of Ethics is contained in Article I of Chapter 2 of the Richardson Code of Ordinances. It is very similar to Chapter 171 of the Texas Local Government Code in that it prohibits participation in a decision if a council member or his immediate family (parent, spouse, sibling, child) has a substantial interest in a matter. The ordinance defines a "substantial interest" for the purpose of the ethics ordinance and for Section 21.01 of the Charter in the same terms as Section 171.002, Texas Government Code:

- (1) ownership of ten percent or more of the voting stock or shares of the business entity affected by the decision or ten percent or more or \$15,000 or more of the fair market value of a business entity or
- (2) if funds received by a person from the business entity exceed 10 percent of that person's gross income for the previous year.
- (3) ownership of an interest worth \$2500 or more in land which will be reasonably foreseeable to be affected differently by the decision than the public.

The Code of Ethics also prohibits acceptance of certain gifts, engaging in outside activities conflicting with duties, disclosure of confidential information, misuse of office to secure special privileges, and misuse of city property.

Complaints of a violation of the Code of Ethics require a sworn statement on a city form filed with the City Secretary. The complaint must describe in detail the act or acts complained of and state the specific section of the Code of Ethics which has been violated. If it is determined by the City Attorney that a criminal violation may exist, he is to refer the matter to the appropriate law enforcement agency. The City Attorney or his designee is to review the facts

April 9, 2015

Page 2

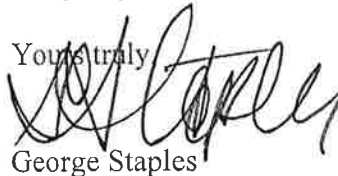
alleged and determine whether they could allege a violation of the Code of Ethics and notify the Mayor and City Council of the existence and nature of the complaint. If the City Attorney or his designee determines that the complaint is insufficient in detail or fails to allege a prima facie violation, a written report is submitted to the City Council.

When a complaint is received which is vague or lacking in detail, the City Attorney or his designee is required to contact the complainant to request a written clarification.

After reviewing your complaint, it is my opinion that you have not alleged any specific facts or detail. You have not described any substantial interest as defined by the ordinance, nor have you stated when this interest existed or what actions violated the Code of Ethics.

Because I have a 15 day deadline to make my required report to the City Council, I respectfully request that you provide me clarification on or before **Thursday, April 16, 2015** describing the substantial interest upon which the complaint is made and the date that such interest was acquired. If you fail to timely respond with such clarification, I will report that the complaint is insufficient in detail and fails to allege a prima facie violation of the Code of Ethics.

Yours truly,

A handwritten signature in black ink, appearing to read "George Staples", written over the typed name below.

George Staples

GAS/kh



TAYLOR·OLSON·ADKINS·SRALLA·ELAM
L.L.P.
ATTORNEYS & COUNSELORS

6000 WESTERN PLACE, SUITE 200
1-30 AT BRYANT IRVIN ROAD
FORT WORTH, TEXAS 76107
EMAIL:TOASE@TOASE.COM

TELEPHONE: (817) 332-2580
TOLL FREE: (800) 318-3400
FACSIMILE: (817) 332-4740
WEBSITE: WWW.TOASE.COM

GEORGE A. STAPLES
gstaples@toase.com

April 14, 2015

Mr. William P. Hardeman
2405 Grandview Drive
Richardson, Texas 75080

Re: Ethics Complaint Dated April 9, 2015

Dear Mr. Hardeman:

Pursuant to Section 2-7(f) of the Richardson Code of Ordinances, Mr. Pete Smith has engaged me to perform his duties concerning investigation of complaints under the Richardson Code of Ethics. This letter is in response to your complaint filed April 9, 2015.

The Code of Ethics is contained in Article I of Chapter 2 of the Richardson Code of Ordinances. It is very similar to Chapter 171 of the Texas Local Government Code in that it prohibits participation in a decision if a council member or his immediate family (parent, spouse, sibling, child) has a substantial interest in a matter. The ordinance defines a "substantial interest" for the purpose of the ethics ordinance and for Section 21.01 of the Charter in the same terms as Section 171.002, Texas Government Code:

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Complaints of a violation of the Code of Ethics require a sworn statement on a city form filed with the City Secretary. The complaint must describe in detail the act or acts complained of and state the specific section of the Code of Ethics which has been violated. If it is determined by the City Attorney that a criminal violation may exist, he is to refer the matter to the appropriate law enforcement agency. The City Attorney or his designee is to review the facts

April 14, 2015

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alleged and determine whether they could allege a violation of the Code of Ethics and notify the Mayor and City Council of the existence and nature of the complaint. If the City Attorney or his designee determines that the complaint is insufficient in detail or fails to allege a prima facie violation, a written report is submitted to the City Council.

When a complaint is received which is vague or lacking in detail, the City Attorney or his designee is required to contact the complainant to request a written clarification.

After reviewing your complaint, it is my opinion that you have not alleged any specific facts or detail. You have not described any substantial interest as defined by the ordinance, nor have you stated what actions violated the Code of Ethics. There is nothing in the Code of Ethics which addresses "inappropriate business or personal relationships" nor is there anything which could remotely constitute a violation in the Mayor's declining to accept another term..

Because I have a 15 day deadline to make my required report to the City Council, I respectfully request that you provide me clarification on or before **Tuesday, April 21, 2015** describing the substantial interest upon which the complaint is made and the date and detail that such interest was acquired. If you fail to timely respond with such clarification, I will report that the complaint is insufficient in detail and fails to allege a prima facie violation of the Code of Ethics.

Yours truly,


George Staples

GAS/kh



TAYLOR·OLSON·ADKINS·SRALLA·ELAM
LLP
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GEORGE A. STAPLES
gstaples@toase.com

April 14, 2015

Ms. Sharon K. Hardeman
2405 Grandview Drive
Richardson, Texas 75080

Re: Ethics Complaint Dated April 9, 2015

Dear Ms. Hardeman:

Pursuant to Section 2-7(f) of the Richardson Code of Ordinances, Mr. Pete Smith has engaged me to perform his duties concerning investigation of complaints under the Richardson Code of Ethics. This letter is in response to your complaint filed April 9, 2015.

The Code of Ethics is contained in Article I of Chapter 2 of the Richardson Code of Ordinances. It is very similar to Chapter 171 of the Texas Local Government Code in that it prohibits participation in a decision if a council member or his immediate family (parent, spouse, sibling, child) has a substantial interest in a matter. The ordinance defines a "substantial interest" for the purpose of the ethics ordinance and for Section 21.01 of the Charter in the same terms as Section 171.002, Texas Government Code:

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April 14, 2015

Page 2

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When a complaint is received which is vague or lacking in detail, the City Attorney or his designee is required to contact the complainant to request a written clarification.

After reviewing your complaint, it is my opinion that you have not alleged any specific facts or detail. You have not described any substantial interest as defined by the ordinance, nor have you stated what actions violated the Code of Ethics. There is nothing in the Code of Ethics which addresses "inappropriate business or personal relationships" nor is there anything which could remotely constitute a violation in the Mayor's declining to accept another term..

Because I have a 15 day deadline to make my required report to the City Council, I respectfully request that you provide me clarification on or before **Tuesday, April 21, 2015** describing the substantial interest upon which the complaint is made and the date and detail that such interest was acquired. If you fail to timely respond with such clarification, I will report that the complaint is insufficient in detail and fails to allege a prima facie violation of the Code of Ethics.

Yours truly,

George Staples

GAS/kh

Kristi Howard

From: George Staples
Sent: Wednesday, April 22, 2015 10:54 AM
To: Kristi Howard
Subject: FW: Answer to George Staples's letter

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Print for File

From: Jack Hardeman [mailto:wph1836@yahoo.com]
Sent: Monday, April 20, 2015 1:01 PM
To: Pete Smith; Aimee.Nemer@cor.gov; dan.johnson@cor.gov; Pete Smith; George Staples
Subject: Answer to George Staples's letter

Hello Aimee, Pete and Dan and George;

I have received the letter in response to my Code of Ethic complaint from George - thank you. I have included my complaint as well as the bullets covered by the **independent investigation** below for reference. First, I would like to express that the letter received had a tone of dismissal and actually insulting to me as a citizen of Richardson...but, again, thank you for responding. I am hoping that this is the required response to the code of ethics allegations, but not the **independent investigation** which has been promised by the city to review behavior of Maczka and the council's ancillary action.

I am providing a timeline of what I have heard (yes, hearsay) and what I know below:

- *Suspected inappropriate relationship began late 2013 / early 2014
- Council Meeting / Final Palisades Zoning Vote: June 9, 2014
- Maczka's Divorce filed: August 2014
- *Maczka's friends knew of Relationship: September 2014
- *Council members knew of Relationship: December 2014
- **Filing Deadline for May 9th Election: February 27, 2015**
- Conflict of Interest Filed Maczka/Jordan: March 19, 2015
- Maczka begins working for JP Partners: April 1, 2015
- Maczka announces will not accept 2nd term: April 2, 2015
 - *unverified - needs an **independent investigation**

So here are my questions to those addressed in this email:

1. Is the purpose of George Staple appointment to answer letters or is he doing and **independent investigation**?
2. Is it the duty of the administrative members of our city government to protect and cover the interest of the city and residents or should they protecting the interest of the elected officials? Why would this be done so blatantly and blindly without a thorough **independent investigation**?

3. Is there really going to be a defense of Maczka's inappropriate behavior as personal and not business related? The behavior is wrong at its base and she has had influence on the other council members as their leader and well is professionally benefiting due to her employment by the developer in this case? And without a proper **independent investigation**?

Incidentally, within the Code of Ethics, the paragraph under the numbered section, which states: "The Code of Ethics also prohibits acceptance of certain gifts, engaging in outside activities conflicting with duties, disclosure of confidential information, misuse of office to secure special privileges, and misuse of city property" certainly applies in this situation...in more ways than one.

The city has the opportunity to *act appropriately* and *take action*....or it can hide behind a delegated and prepared response in the name of an *independent investigation*.

Respectfully,

William Hardeman
2406 Grandview Drive
469-744-2224

Code of Ethic Complaint – filed 4/10/2015

- I am making the complaint to the city of Richardson against Mayor Laura Maczka for violations of the City's Code of Ethics for Standard of Conduct. Specifically regarding behavior relating to an inappropriate business and personal relationship with Mark Jordan, who is a lead developer in the Palisades development in which zoning change votes were made over the course of the 2013 and 2014 years.
- Allegations are that Maczka began this inappropriate relationship prior to a final zoning vote that raised a number of multi-family units from an originally zoned 340 (approx.) units to over 1000 units.
- Although this complaint is made against Mayor Laura Maczka, I also believe the timing of Maczka's filing of a Conflict of Interest statement on March 19th with the city, when she disclosed her continued professional relationship with Mark Jordan, who also filed a reciprocal COI statement and her declaration of not continuing as Mayor after the May 9th municipal elections, are suspect of not only her actions, but those of the entire City Council. This timing seems all too convenient, preventing other candidates from being able to meet the deadline to file for the Mayor's place and run in the May 9th election. This of course leaves the decision of Maczka's replacement to the current council to select the city's next Mayor. One council member has stated that he knew of this conflict as early as February 2015. I believe others knew as early as December 2014.
- This leave the questions of motive, etc. which lend itself to a lot of conjecture as to the personal relationship between Maczka and Jordan. Conjecture does place this relationship as beginning prior to the final zoning vote in 2014. Facts related to this are final divorce decrees for both Maczka and Jordan. This would also cause this personal relationship to effect her professional deportment as Mayor of the city, especially with regard to the zoning votes involving Jordan and his business interests.
- I voted for Maczka as a candidate for Mayor due to her public stance of being against additional multi unit expansion. I also attended a city council meeting with the Jordan Palisades property zoning question being heard and voted upon. This meeting was stated as having one of the largest citizen turnouts. Maczka stated in that meeting the she heard the voice of the citizens, but did not agree. She then voted with Mark Jordan's proposed additional

request. I believe at this point she had undue influence over the voting decisions of the other council members.

City of Richardson Week in Review, April 10, 2015

City Attorney Appoints Outside Legal Counsel to Conduct Ethics Violation Investigation

Richardson's City Attorney has appointed outside legal counsel George A. Staples, Jr. to review and process any written complaints filed under the City Ethics Code regarding the events surrounding the zoning change for the Palisades mixed-use development in Richardson. In addition to evaluating any filed complaints, Staples has also been engaged by the city attorney to conduct an independent investigation of the events surrounding this change in zoning. This independent investigation is separate and apart from what is required under the Ethics Code.

The purpose of the investigation is to determine the facts surrounding the issues of:

- whether the mayor or members of the City Council violated the Ethics Code, state law or the City Charter in the approval of the Palisades zoning;
- whether the mayor had a business relationship with Mark Jordan/JP Realty or other developer of the Palisades property at the time the zoning change was approved;
- whether there is any evidence that the mayor's intended declination to serve as mayor for 2015-2017 was done for the purpose of allowing the remaining members of the Council to select the next mayor;
- and any other matter that Staples deems relevant to the scope of the investigation.

The independent investigation to be conducted by Staples is intended to answer citizens' questions with respect to this issue that may not be addressed in any written complaint filed under the Ethics Code. While there is no set timeline for the independent investigation regarding events surrounding the zoning change decision, it will be conducted in as timely a manner as possible.

CODE OF ETHICS COMPLAINT FORM

Name of Official alleged to have violated the Code of Ethics:	Laura Maczka
Specific section (i.e., 2-4 or 2-5) of the Code of Ethics alleged to have been violated:	Sec. 2.4 Standards of Conduct
Dated filed with the City Secretary:	
In the Affidavit below, please describe in detail the act or acts which are the factual basis for your complaint that the above-named City officer has violated the section(s) of the Code of Ethics identified above. If you believe multiple violations have occurred, please describe in detail the act or acts which support each violation set out in your complaint:	
<u>AFFIDAVIT</u>	
STATE OF TEXAS	§
COUNTY OF DALLAS	§
<p>BEFORE ME, the undersigned authority, on this day personally appeared <u>Sherri Hawkins</u>, who, being by me first duly sworn, stated under oath the following:</p> <p>I am writing to make a formal complaint to the city of Richardson against Laura Maczka for violations of the City's Code of Ethics for Standard of Conduct.</p> <p>I first became concerned during the city council meeting in which many residents voiced their concerns for the increased traffic and over crowding of schools that the Pallasades would cause. The Mayors aloof attitude towards her constituents was very disconcerting. Since the passing of the Pallasades rezoning many questions about the Mayor and her relationship with the developer, Mark Jordan, have come to light.</p> <p>On March 19th the Mayor filed a Conflict of Interest statement with the city disclosing her professional relationship with Mark Jordan. She also announced that after the election on May 9th she would not be sworn in, but resign her position as Mayor. The timing of her actions is suspect at best. I do not believe the citizens of Richardson are naive enough to believe that all of these events are coincidental. It seems entirely too convenient that these announcements where made after the deadline to file to run against our incumbent Mayor had passed. It is also my understanding that according to our City Charter there is also a deadline to register a write in on the May 9th ballot.</p> <p>All of this leaves all the power in the hands of a City Council to appoint our next Mayor. Power in the hands of people that should also be under investigation for their culpability in the actions of our current Mayor.</p>	
*If additional space is needed, please attach continuation forms numbered in sequence as necessary.	

CODE OF ETHICS COMPLAINT FOR CONTINUATION SHEETS

There are questions of when the personal or professional relationship between Mayor Maczka and Mark Jordan began. There are question of when the City Council became aware of the personal and/or professional relationship between Mayor Maczka and Mark Jordan. There are questions to wether one or more of the City Council was in collusion with the Mayor on her filing of the COI statement and announcement of her resignation after the May 9th election.

It is public record that both Mayor Maczka and Mark Jordan have recently divorced. Too many questions, too many coincidences for this all to be within the standards of conduct.

[Handwritten Signature]

COMPLAINANT (AFFIANT)
Address: 2402 Grandview Drive
Richardson, Texas 75080
Telephone #: 214-213-9135

STATE OF TEXAS §
COUNTY OF DALLAS §

SUBSCRIBED AND SWORN BEFORE ME on the 10 day of April, 2015.



[Handwritten Signature: Sarah J. Kolter]

Notary Public, State of Texas
Printed Name: Sarah J. Kolter
My Commission Expires: 5-27-17

George Staples

From: George Staples
Sent: Saturday, April 25, 2015 11:36 AM
To: sherrih@donherring.com
Subject: April 10 2015

I have just been provided a copy of your April 10 complaint and after reviewing it, it is my opinion that it lacks detailed facts which would constitute a valid complaint under the Richardson Code of Ethics. For this reason, I need to offer you the opportunity to clarify your complaint to set out any facts of which you have personal knowledge which could constitute a conflict of interest under that Code. Please be aware that financial rather than personal relationships are the only matters which can form the basis of a violation.

For your information, I will be making two reports to council, one on the complaints and one on an investigation which I have been instructed to undertake on the question of whether there is any evidence of a violation of the Code of Ethics, the Charter or statutory law by the Mayor or any council member concerning votes on the zoning, the acceptance by the Mayor of employment with the developer's company or her actions concerning the upcoming election or her decision to decline the office of Mayor after the election. This investigation and report will be made whether you clarify your complaint or not.

I am out of town this weekend, but we will try to call you Monday for any further information you are willing to provide.

George Staples
Taylor Olson Adkins Sralla & Elam, LLP
6000 Western Place Suite 200
Fort Worth, Texas, 76107
817 332 2580
Cell: 817 319 3962

Sent from my iPad

George Staples

From: George Staples
Sent: Saturday, April 25, 2015 12:11 PM
To: sherrih@donherring.com
Subject: Richardson complaint

Ms. Hawkins:
Please feel free to respond to me via email this weekend.
George Staples

Sent from my iPhone

George Staples

From: George Staples
Sent: Monday, April 27, 2015 9:04 AM
To: George Staples
Subject: Richardson complaint clarification request texts

Ms. Hawkins:

I sent you email earlier today concerning your complaint received from the Richardson city secretary this morning. In it I noted that your complaint does not contain detailed facts adequate to establish a valid complaint and requesting clarification. Please feel free to respond this weekend. You need to set out facts of which you have personal knowledge which describe a financial benefit conferred at or before the time a vote was taken or a family relationship which is described in the Code of Ethics which existed at the time that a vote was taken or a contractual relationship with the city was entered into. If you do not provide clarification, we will report that your complaint does not set out facts adequate to establish the possibility of a violation, but will report the result of our investigation on the same subject matter without regard to the complaint sufficiency.

George Staples
gstaples@toase.com
Cell: 817 319 3962

I received your email. I am confident that all parties will do the right thing, especially in light of the personal emails between the Mayor and Mr. Jordan where exposed on the channel 8 (ABC affiliate) last night. The emails where dated December 2013, not sure that "jumping on Dart to go play at Northpark" lead to ethically or moral acts.

Best,
Sherri Herring Hawkins

Sent from my iPhone