

TEXAS ETHICS COMMISSION

IN THE MATTER OF
RUBY FAYE WOOLRIDGE,
RESPONDENT

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BEFORE THE
TEXAS ETHICS COMMISSION
SC-32211445

ORDER and AGREED RESOLUTION

I. Recitals

The Texas Ethics Commission (Commission) met on June 27, 2023, to consider sworn complaint SC-32211445. A quorum of the Commission was present. The Commission determined that there is credible evidence of violations of Sections 252.001, 254.063, and 254.064 of the Election Code, laws administered and enforced by the Commission. To resolve and settle this complaint without further proceedings, the Commission adopted this resolution.

II. Allegations

The complaint alleged that the respondent: 1) failed to timely file a campaign treasurer appointment, in violation of Section 252.001 of the Election Code; 2) failed to timely file a July 2022 semiannual campaign finance report, in violation of Section 254.063 of the Election Code; and 3) failed to timely file an 8-day pre-election report, in violation of Section 254.064 of the Election Code.

III. Findings of Fact and Conclusions of Law

Credible evidence available to the Commission supports the following findings of fact and conclusions of law:

1. The respondent was elected to Arlington City Council, District 6, in the November 3, 2020 general election. The respondent was an unsuccessful candidate for Tarrant County Commissioner, Precinct 2, in the March 1, 2022 primary election. The respondent was also an unsuccessful candidate for Tarrant County District Clerk in the November 8, 2022 general election.

Campaign Treasurer Appointment

2. The complaint alleged that the respondent did not timely file her campaign treasurer appointment for her Tarrant County District Clerk campaign. Specifically, the complaint alleged that the respondent was nominated by the Tarrant County Democratic Party to run for Tarrant County District Clerk in the November 8, 2022 election on June 21, 2022, at a time when the respondent did not have a campaign treasurer appointment on file with Tarrant County.
3. The respondent had filed a campaign treasurer appointment with the Tarrant County Elections Administrator on December 2, 2021 for her campaign for Tarrant County Commissioner. On February 11, 2022, the respondent also transferred her campaign treasurer appointment from her campaign for Arlington City Council in 2020 from the City of Arlington to the Tarrant County Elections Administration for her campaign for Tarrant County Commissioner. Records on file with Tarrant County show that the respondent did not file a final report terminating this campaign treasurer appointment until November 18, 2022. Records on file with Tarrant County also show that the respondent filed her campaign treasurer appointment for her Tarrant County District Clerk campaign with the Tarrant County Elections Administration on July 20, 2022, terminating her previous campaign treasurer appointment.
4. In response to the complaint, the respondent swore that she did not “solicit campaign donations or make any campaign-related expenses” prior to filing her campaign treasurer appointment for her Tarrant County District Clerk campaign on July 20, 2022.
5. Each candidate and each political committee shall appoint a campaign treasurer as provided by this chapter. Tex. Elec. Code § 252.001.
6. “Candidate” means a person who knowingly and willingly takes affirmative action for the purpose of gaining nomination or election to public office. Examples of affirmative action includes the making of a public announcement of a definite intent to run for public office in a particular election. *Id.* § 251.001(1)(E).
7. The respondent’s campaign treasurer appointment for her Tarrant County Commissioner campaign remained in effect until she filed her campaign treasurer appointment for her Tarrant County District Clerk campaign on July 20, 2022. Therefore, at all points relevant to this complaint the respondent had a campaign treasurer appointment in effect. Therefore, there is credible evidence of no violation of Section 252.001 of the Election Code.

July 2022 Semiannual Report

8. The complaint alleged that the respondent failed to file a July 2022 semiannual campaign finance report.

9. The information submitted with the complaint showed that as of November 14, 2022, the respondent had not filed a July 2022 semiannual campaign finance report with the Tarrant County Elections Administration.
10. In response to the complaint, the respondent filed two July 2022 semiannual reports on November 18, 2022. The first for her Tarrant County Commissioner campaign, covering the period of time from February 20, 2022, through June 30, 2022; and the second for her Tarrant County District Clerk campaign, covering the period of time from June 21, 2022, through June 30, 2022.
11. The first report disclosed \$1,000 in total political contributions, \$1,000 in total political expenditures, \$0 in total political contributions maintained, and \$10,000 in outstanding loans. This report was marked as a final report. The second report disclosed \$0 in total political contributions, \$0 in total political expenditures, and \$0 in total political contributions maintained.
12. In response to the complaint, the respondent swore that she did not file a July 2022 semiannual report following her campaign for Tarrant County Commissioner as she did not believe that report was necessary, given that she had lost the race.
13. The respondent became a candidate on December 2, 2021 when she filed her campaign treasurer appointment for Tarrant County Commissioner. She remained a candidate until July 20, 2022, when she filed her campaign treasurer appointment for Tarrant County District Clerk.
14. A candidate shall file two reports for each year. Tex. Elec. Code § 254.063(a). The first report shall be filed not later than July 15. The report covers the period beginning January 1, the day the candidate's campaign treasurer appointment is filed, or the first day after the period covered by the last report required to be filed under this subchapter, as applicable, and continuing through June 30. *Id.* § 254.063(b).
15. Credible evidence indicates that the respondent did not timely file a July 2022 semiannual campaign finance report. Therefore, there is credible evidence of a violation of Section 254.063 of the Election Code.

8-Day Pre-election Report

16. The complaint alleges that the respondent did not timely file her 8-day pre-election report for the November 8, 2022 election.
17. The information submitted with the complaint showed that as of November 14, 2022, the respondent had not filed her 8-day pre-election report with Tarrant County, which was due by October 31, 2022.

18. In response to the complaint, the respondent swore that she missed the filing deadline because of an illness in the family. The respondent swore that she sought an extension of the deadline when she realized that she would be unable to meet the filing deadline, but made her request to the incorrect person. The respondent filed her 8-day pre-election report on November 18, 2022. The report disclosed \$2,833 in total political contributions, \$2,532 in total political expenditures, \$3,345 in total political contributions maintained, and \$4,820 in outstanding loans.
19. In addition to other required reports, for each election in which a person is a candidate and has an opponent whose name is to appear on the ballot, the person shall file two reports. Tex. Elec. Code § 254.064(a). The second report must be received by the authority with whom the report is required to be filed not later than the eighth day before election day. The report covers the period beginning the 19th day before election day and continuing through the 10th day before election day. *Id.* § 254.064(c).
20. The respondent was a candidate and had an opponent on the ballot in the November 8, 2022 election. Therefore, the respondent was required to file her 8-day pre-election report by October 31, 2022. The respondent filed her 8-day pre-election report late on November 18, 2022. Therefore, there is credible evidence of a violation of Section 254.064 of the Election Code.

IV. Representations and Agreement by Respondent

By signing this order and agreed resolution and returning it to the Commission:

1. The respondent neither admits nor denies the findings of fact and conclusions of law described under Section III, and consents to the entry of this order and agreed resolution solely for the purpose of resolving this sworn complaint.
2. The respondent consents to this order and agreed resolution and waives any right to further proceedings in this matter.
3. The respondent acknowledges the filing requirements prescribed by Sections 254.063 and 254.064 of the Election Code. The respondent agrees to comply with these requirements of the law.

V. Confidentiality

This order and agreed resolution describes violations that the Commission has determined are neither technical nor *de minimis*. Accordingly, this order and agreed resolution is not confidential under

Section 571.140 of the Government Code and may be disclosed by members and staff of the Commission.

VI. Sanction

After considering the nature, circumstances, and consequences of the violations described under Section III, and after considering the sanction necessary to deter future violations, the Commission imposes a \$300 civil penalty.

VII. Order

The Commission hereby orders that if the respondent consents to the proposed resolution, this order and agreed resolution is a final and complete resolution of SC-32211445.

AGREED to by the respondent on this _____ day of _____, 2023.

Ruby Faye Woolridge, Respondent

EXECUTED by the Commission on: _____.

Texas Ethics Commission

By: _____
J.R. Johnson, Executive Director