

# TEXAS ETHICS COMMISSION

IN THE MATTER OF  
CARLOS DE LOS SANTOS,  
RESPONDENT

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BEFORE THE  
TEXAS ETHICS COMMISSION  
SC-32410554



## ORDER and AGREED RESOLUTION

### I. Recitals

The Texas Ethics Commission (TEC) met on June 12, 2025, to consider sworn complaint SC-32410554. A quorum of the TEC was present. The TEC determined that there is credible evidence of a violation of Section 254.063 of the Election Code, a law administered and enforced by the TEC.

To resolve and settle this complaint without further proceedings, the TEC adopted this resolution imposing a \$500 civil penalty. If the penalty is not paid in full within 30 days of the date of this Order and Agreed Resolution, then the TEC orders that an additional \$2,500 civil penalty be imposed pursuant to Section 571.173 of the Government Code for delay in complying with this Order and Agreed Resolution, and that the agreed-upon penalty and the additional \$2,500 penalty be referred to the Office of the Attorney General of Texas for collection.

### II. Allegations

Sworn complaint SC-32410554 alleged that the respondent failed to file a July 2024 semiannual campaign finance report, which was due by July 15, 2024, in violation of Section 254.063 of the Election Code, and failed to file the 30 day pre-election report for the November 5, 2024 general election, which was due by October 7, 2024, in violation of Section 254.064 of the Election Code.

### III. Findings of Fact and Conclusions of Law

1. The respondent was an unsuccessful candidate for the precinct 3 position as a Maverick County, Texas, County Commissioner, in the November 5, 2024 general election.
2. According to records on file with Maverick County, the respondent did not file a July 2024 semiannual report. There is therefore credible evidence of a violation of Section 254.063 of the Election Code.
3. The Maverick County records confirm that the respondent in fact filed a 30-day pre-election campaign finance report. Therefore, there is credible evidence of no violation of Section 254.064 of the Election Code.

4. The respondent was a candidate running for the first time, who relied on reminders from the Maverick County election department for meeting deadlines. However, there is no indication that the respondent intended to conceal campaign activity.

#### **IV. Representations and Agreement by Respondent**

1. The respondent consents to this Agreed Order of Resolution for the purpose of resolving and settling this sworn complaint. The respondent neither admits nor denies the findings of fact and conclusions of law described under Section III.
2. The respondent waives any right to further proceedings in this matter. The respondent consents to TEC staff presenting this order to the Commissioners outside of the respondent's presence.
3. The respondent acknowledges that a candidate must file two semiannual reports for each year, on July 15 and January 15, according to Chapter 254 of the Election Code, and to file semiannual campaign finance reports while they remain a candidate or officeholder. Going forward, the respondent agrees to fully and strictly comply with these requirements of law.
4. The respondent understands and agrees that the TEC will consider this order and agreed resolution of SC-32410554 in any future sworn complaint proceedings against the respondent regarding similar violations that occur after the date this agreement is executed.

#### **V. Confidentiality**

This order and agreed resolution describes violations that the TEC 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 TEC.

#### **VI. Sanction**

The TEC may impose a civil penalty of not more than \$5,000 or triple the amount at issue under a law administered and enforced by the TEC, whichever amount is more, for a delay in complying with a TEC order or for violation of a law administered and enforced by the TEC. Tex. Gov't Code § 571.173. The TEC shall consider the following factors in assessing a sanction: 1) the seriousness of the violation, including the nature, circumstances, consequences, extent and gravity of the violation; 2) the history and extent of previous violations; 3) the demonstrated good faith of the violator, including actions taken to rectify the consequences of the violation; 4) the penalty necessary to deter future violations, and 5) any other matters that justice may require. *Id.* § 571.177.

The violation is not an unusually serious reporting violation, and because the respondent was an unsuccessful candidate, there is less need to ensure his future compliance. However, because the respondent has failed to correct his reports, a \$500 penalty is appropriate.

*Conclusion*

After considering the nature, circumstances, and consequences of the violations described under Sections III and VI, the TEC imposes a \$500 civil penalty that, if not paid in full within 30 days of the date of this order, it is then hereby ordered that an additional \$2,500 civil penalty be imposed pursuant to Section 571.173 of the Government Code for delay in complying with this Order and Agreed Resolution. The agreed-upon penalty and the additional \$2,500 penalty will then be referred to the Office of the Attorney General of Texas for collection.

**VII. Order**

The TEC hereby orders that if the respondent consents to the proposed resolution, this order and agreed resolution is a final and complete resolution of SC-32410554.

AGREED to by the respondent on this 13 day of March, 2025.

  
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Carlos De Los Santos, Respondent

EXECUTED by the TEC on: 6/13/23.

Texas Ethics Commission

By:

  
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J.R. Johnson, Executive Director