



# TEXAS ETHICS COMMISSION

P. O. Box 12070, Capitol Station  
Austin, Texas 78711-2070

Jim Clancy  
Chair

Paul W. Hobby  
Vice Chair

Natalia Luna Ashley  
Executive Director

June 11, 2014

Commissioners

Hugh C. Akin  
Wilhelmina Delco  
Tom Harrison  
Bob Long  
Tom Ramsay  
Chase Untermeyer

Mr. Sandy B. Bahm, III  
148 Lipan Street  
Greenville, Texas 75402-2808

**FIRST CLASS MAIL**

**Re: Notice of Complaint, SC-31405128 (James "Jim" Graham)**

Dear Mr. Bahm:

We received resubmitted sworn complaint SC-31405128 on June 4, 2014. The complaint meets the technical form requirements for a complaint filed with the Texas Ethics Commission, and the executive director has determined that the Ethics Commission has jurisdiction over the matters alleged in the sworn complaint.

***This letter only acknowledges that the complaint meets the jurisdictional and form requirements for a complaint filed with the Texas Ethics Commission and does not constitute any findings regarding the allegations made in the complaint.***

The complaint you filed alleged that the respondent: 1) did not include a correct disclosure statement on political advertising, as required by section 255.001 of the Election Code; and 2) represented in political advertising or campaign communications that the communications emanated from a source other than their true source, which is prohibited by section 255.004 of the Election Code.

More information about the complaint process is available on the Ethics Commission's website at [www.ethics.state.tx.us](http://www.ethics.state.tx.us).

Please note that at this stage in the process, Ethics Commission members and staff are required by law to keep the complaint and all documents relating to it strictly confidential. However, other persons, including the complainant and respondent named in the complaint, are not bound by this confidentiality requirement.

*Come visit our home page at <http://www.ethics.state.tx.us> on the Internet.*

**(512) 463-5800 • FAX (512) 463-5777 • TDD 1-800-735-2989**

The Texas Ethics Commission does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or the provision of services.

Please call me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be 'N. S. Espinosa', written in a cursive style.

Nicholas S. Espinosa  
Assistant General Counsel

NSE:mc