

SWORN COMPLAINT BEFORE THE TEXAS ETHICS COMMISSION

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Please completely fill out this form. Failure to complete this form properly will cause your complaint to be noncompliant and rejected.

OFFICE USE ONLY	
Docket Number	
Date Hand-delivered or Date Postmarked	

I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mrs.	Brenda	
	NICKNAME	LAST	SUFFIX
		Rizos	
2 COMPLAINANT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #;	CITY; STATE; ZIP CODE
			Lucas TX 75002
	(Full home or business address, including street, city, state, and zip code)		
3 COMPLAINANT MAILING ADDRESS <input type="checkbox"/> (check if same as above) (REQUIRED)	ADDRESS	APT / SUITE #;	CITY; STATE; ZIP CODE
	(Full street or mailing address, including city, state, and zip code)		
4 COMPLAINANT TELEPHONE NUMBER (REQUIRED)	AREA CODE	PHONE NUMBER	EXT
	972		
	5 COMPLAINANT E-MAIL ADDRESS (REQUIRED IF KNOWN)		

II. IDENTITY OF RESPONDENT

6 RESPONDENT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mr.	Scott	
	NICKNAME	LAST	SUFFIX
		Christiansen	
7 RESPONDENT POSITION OR TITLE (REQUIRED)	Lovejoy School Board of Trustee		
8 RESPONDENT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #;	CITY; STATE; ZIP CODE
			Lucas TX 75002
	(Full home or business address, including street, city, state, and zip code)		
9 RESPONDENT MAILING ADDRESS <input type="checkbox"/> (check if same as above)	ADDRESS	APT / SUITE #;	CITY; STATE; ZIP CODE
	(Full street or mailing address, including city, state, and zip code)		
10 RESPONDENT TELEPHONE NUMBER (REQUIRED)	AREA CODE	PHONE NUMBER	EXT
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	Mrs <small>NICKNAME</small>	Brenda <small>LAST</small>	A <small>SUFFIX</small>
Rizos			
2 COMPLAINANT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #;	CITY; STATE; ZIP CODE
Lucas TX 75002			
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972			
5 COMPLAINANT E-MAIL ADDRESS (REQUIRED IF KNOWN)			

II. IDENTITY OF RESPONDENT

6 RESPONDENT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mr. <small>NICKNAME</small>	Ted <small>LAST</small>	
Moore			
7 RESPONDENT POSITION OR TITLE (REQUIRED)	Lovejoy ISD Superintendent		
8 RESPONDENT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT/SUITE #;	CITY; STATE; ZIP CODE
259 Country Club Road, Allen, TX 75002			
(Full home or business address, including street, city, state, and zip code)			
9 RESPONDENT MAILING ADDRESS <input type="checkbox"/> (check if same as above)	ADDRESS	APT/SUITE #;	CITY; STATE; ZIP CODE
(Full street or mailing address, including city, state, and zip code)			
10 RESPONDENT TELEPHONE NUMBER (REQUIRED)	AREA CODE	PHONE NUMBER	EXT
972.415.8129			
11 RESPONDENT E-MAIL ADDRESS (REQUIRED IF KNOWN)	ted_moore@lovejoyisd.net		

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	972		
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II. IDENTITY OF RESPONDENT

6 RESPONDENT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mrs	Ann	
	NICKNAME	LAST	SUFFIX
		Casey	
7 RESPONDENT POSITION OR TITLE (REQUIRED)	Lovejoy School Board of Trustees President (at time of complaint)		
8 RESPONDENT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT/SUITE #;	CITY; STATE; ZIP CODE
			Fairview TX 75069
	(Full home or business address, including street, city, state, and zip code)		
9 RESPONDENT MAILING ADDRESS <input type="checkbox"/> (check if same as above)	ADDRESS	APT/SUITE #;	CITY; STATE; ZIP CODE
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Rizos			
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Lucas TX 75002 (Full home or business address, including street, city, state, and zip code)			
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972			5 COMPLAINANT E-MAIL ADDRESS (REQUIRED IF KNOWN)

II. IDENTITY OF RESPONDENT

6 RESPONDENT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mr. NICKNAME	Chad LAST	 SUFFIX
Collins			
7 RESPONDENT POSITION OR TITLE (REQUIRED)	Lovejoy School Board Trustee (Current President)		
8 RESPONDENT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT/SUITE #;	CITY; STATE; ZIP CODE
Lucas, TX 75002 (Full home or business address, including street, city, state, and zip code)			
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(check if same as above) (Full street or mailing address, including city, state, and zip code)			
10 RESPONDENT TELEPHONE NUMBER (REQUIRED)	AREA CODE	PHONE NUMBER	EXT
11 RESPONDENT E-MAIL ADDRESS (REQUIRED IF KNOWN)			chad_collins@lovejoyisd.net

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972			
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II. IDENTITY OF RESPONDENT

6 RESPONDENT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mr. NICKNAME	Dennis LAST	 SUFFIX
Womack			
7 RESPONDENT POSITION OR TITLE (REQUIRED)	Lovejoy ISD Asst. Superintendent for Operations		
8 RESPONDENT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT/SUITE #;	CITY; STATE; ZIP CODE
259 Country Club Road, Allen, TX 75002			
(Full home or business address, including street, city, state, and zip code)			
9 RESPONDENT MAILING ADDRESS <input type="checkbox"/> (check if same as above)	ADDRESS	APT/SUITE #;	CITY; STATE; ZIP CODE
(Full street or mailing address, including city, state, and zip code)			
10 RESPONDENT TELEPHONE NUMBER (REQUIRED)	AREA CODE	PHONE NUMBER	EXT
(469)742-8017			
11 RESPONDENT E-MAIL ADDRESS (REQUIRED IF KNOWN)	dennis_womack@lovejoyisd.net		

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II. IDENTITY OF RESPONDENT

6 RESPONDENT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mrs. <small>NICKNAME</small>	Julie <small>LAST</small>	 <small>SUFFIX</small>
James			
7 RESPONDENT POSITION OR TITLE (REQUIRED)	Lovejoy ISD School Board Trustee		
8 RESPONDENT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT/SUITE #;	CITY; STATE; ZIP CODE
Fairview, TX 75069			
(Full home or business address, including street, city, state, and zip code)			
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(Full street or mailing address, including city, state, and zip code)			
10 RESPONDENT TELEPHONE NUMBER (REQUIRED)	AREA CODE	PHONE NUMBER	EXT
11 RESPONDENT E-MAIL ADDRESS (REQUIRED IF KNOWN)			Julie_James@lovejoyisd.net

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Rizos			
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II. IDENTITY OF RESPONDENT

6 RESPONDENT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mrs. <small>NICKNAME</small>	Matt <small>LAST</small>	 <small>SUFFIX</small>
Gournay			
7 RESPONDENT POSITION OR TITLE (REQUIRED)	Lovejoy ISD School Board Trustee		
8 RESPONDENT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT/SUITE #;	CITY; STATE; ZIP CODE
Lucas TX 75002 <small>(Full home or business address, including street, city, state, and zip code)</small>			
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10 RESPONDENT TELEPHONE NUMBER (REQUIRED)	AREA CODE	PHONE NUMBER	EXT
			11 RESPONDENT E-MAIL ADDRESS (REQUIRED IF KNOWN)
Matt_Gournay@lovejoyisd.net			

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6 RESPONDENT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mrs. NICKNAME	Al LAST	 SUFFIX
Litchenburg			
7 RESPONDENT POSITION OR TITLE (REQUIRED)	Lovejoy ISD School Board Trustee		
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Fairview TX 75069			
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al_litchenburg@lovejoyisd.net			

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6 RESPONDENT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mrs. NICKNAME	Robbin LAST	 SUFFIX
Wells			
7 RESPONDENT POSITION OR TITLE (REQUIRED)	Lovejoy ISD School Board Trustee		
8 RESPONDENT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT/SUITE #;	CITY; STATE; ZIP CODE
Lucas, TX 75002 (Full home or business address, including street, city, state, and zip code)			
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10 RESPONDENT TELEPHONE NUMBER (REQUIRED)	AREA CODE	PHONE NUMBER	EXT
			11 RESPONDENT E-MAIL ADDRESS (REQUIRED IF KNOWN)
robbin_wells@lovejoyisd.net			

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6 RESPONDENT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mrs. NICKNAME	Shay LAST	 SUFFIX
Adams			
7 RESPONDENT POSITION OR TITLE (REQUIRED)	Lovejoy ISD CFO		
8 RESPONDENT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT/SUITE #;	CITY; STATE; ZIP CODE
	259 Country Club Road, Allen, TX 75002 (Full home or business address, including street, city, state, and zip code)		
9 RESPONDENT MAILING ADDRESS (check if same as above)	ADDRESS	APT/SUITE #;	CITY; STATE; ZIP CODE
	(Full street or mailing address, including city, state, and zip code)		
10 RESPONDENT TELEPHONE NUMBER (REQUIRED)	AREA CODE	PHONE NUMBER	EXT
	(469)	742-8004	
		11 RESPONDENT E-MAIL ADDRESS (REQUIRED IF KNOWN)	
		shay_adams@lovejoyisd.net	

GO TO PAGE 2

III. NATURE OF ALLEGED VIOLATION

Page 2

Include the specific law(s) or rule(s) alleged to have been violated. The Texas Ethics Commission has jurisdiction to enforce only the following laws: (1) Title 15 of the Election Code; (2) Chapters 302, 303, 305, 572, 2004 of the Gov't Code; (3) § 334.025 and § 335.055 of the Local Gov't Code; (4) Subchapter C, Chapter 159 of the Local Gov't Code, in connection with a county judicial officer who elects to file a financial statement with the commission; (5) § 2152.064 and § 2155.003 of the Gov't Code; (6) § 306.005 of the Gov't Code.

Please completely fill out this form. Failure to complete this form properly will cause your complaint to be noncompliant and rejected.

The Lovejoy ISD School Board and Superintendent violated Section 255.003(b-1) when they authorized the direct expenditure of public funds for a \$4325 video containing information they knew was false and also violated Section 255.003 in authorizing the spending of public funds for political advertising. The video in question and other subsequent emails written, using publically funded employee time, strongly advocate for the passage of the May 21st, 2016 TRE and include false information and even threats.

In addition to the cost of the video, the Superintendent and School Board authorized the indirect expenditure of public funds by using school employees and school equipment to distribute political advertising (\$4325 video) in violation of section 255.003, Election Code. (Ethics Advisory Opinion 45) Staff time is an expenditure of funds beyond the basic cost of hardware messaging software and bandwidth (Section 20.1(13)(B) .

Political advertising is defined by section 251.001(16) of the Election Code as follows:

“Political advertising” means a communication supporting or opposing a candidate for nomination or election to a public office or office of a political party, a political party, a public officer, or a measure that:

(A) in return for consideration, is published in a newspaper, magazine, or other periodical or is broadcast by radio or television; or

(B) appears:

(i) in a pamphlet, circular, flier, billboard or other sign, bumper sticker, or similar form of written communication; or

(ii) **on an Internet website.**

All Email Expresses have historically been placed on the official Lovejoy ISD website.

<http://www.lovejoyisd.net/apps/news/category/5224>

http://www.lovejoyisd.net/apps/pages/index.jsp?uREC_ID=389792&type=d&pREC_ID=951108

Shay Adams, the Lovejoy School Board and the Lovejoy Superintendent once again violated Section 255.003 in using public funds for political advertising, in the form of staff time (Shay Adams, Lovejoy ISD CFO) to make another video which strongly advocated for the passage of the May 21st 11 cent TRE.

(In a 1992 advisory opinion, the TEC concluded that the “spending” of public funds included the use of school district employees’ work time as well as the use of existing school district equipment. [Ethics Advisory Opinion No. 45 \(1992\).](#))

I am seeking a ruling on whether the use of school district resources,(including student data, taxpayer funded research, community emails collected by the district) to disseminate political advertising is a use “for” political advertising.

Ethics Advisory Opinion 343 and 443 relate to equal access to district resources for all candidates.

Opinion 343 addresses equal access to a candidate forum and the inherit support for a candidate should access not be open to all candidates. Opinion 443 addresses putting candidate flyers in a teacher’s lounge and all candidates not having access to the teacher’s lounge plus staff time used to place flyers.

Just as with candidates, shouldn’t both sides of a measure have equal access to publically funded district resources (such as district email addresses, district data on parents and their children and publically funded staff time used for research) when the district has used it for political advertising? The PAC opposing the TRE was not given equal access to the “public forum” created by district emails, nor taxpayer funded research and staff time.

ATTACH ADDITIONAL PAGES AS NEEDED

IV. STATEMENT OF FACTS

Page 3

State the facts constituting the alleged violation(s), including the dates on which or the period of time in which the alleged violation(s) occurred. Identify allegations of fact not personally known to the complainant, but alleged on information and belief. Please use simple, concise, and direct statements.

Please completely fill out this form. Failure to complete this form properly will cause your complaint to be noncompliant and rejected.

Video using public funds of \$4325 strongly advocates FOR the passage of the TRE based on

TEC document titled: **Advocating Passage or Defeat of a Measure**

<https://www.youtube.com/watch?v=vUjMcHoCODk&feature=youtu.be>

Lovejoy ISD used \$4325 of public funds to create a video which contains some factual information, but when considered in its entirety it advocates for the passage of the TRE in wording that closely matches example advocacy passages published by the Texas Ethics Commission in addition to playing on the sympathy of parents with the false claim that *“over the last five years the district has frozen salaries”* and with the passage of the TRE would *“provide a teacher pay raise that keeps us competitive with surrounding districts.”*

The video goes on advocating...

“ In order to recruit and retain the best and brightest teachers for our students it is imperative that Lovejoy teachers earn what teachers in surrounding districts earn”. “Almost 50% of the additional funding from the 11 cent tax raise will fund a salary increase for our teachers”.

*“The district now faces major changes to the **delivery of Exemplary Educational Experiences for our students unless additional funding becomes available to maintain our strong track record of educational excellence and fiscal responsibility.**”*

The TRE passage would *“yield the district almost \$2 Million dollars balancing the 2016-2017 budget.*

This would protect the current level of student programming, experiences and expectations”.

*“With the May 21st Election, Lovejoy ISD will receive a clear message from the school community which **reflects their desire and expectations to continue the excellent programs and experiences our students enjoy today”***

Some of the above statements very closely match the Texas Ethics Commission’s “examples of sentences/phrases that **the Texas Ethics Commission has determined advocate passage or defeat of a measure.”**

- "Seeks Voter Approval" . . . "We want to sustain the excellence. And we are now asking voters if they too want to sustain the excellence."
- "After examining our options and each department's budget, we are left with only one way to generate the monies needed to continue programs and services that are essential to our students' success. We must have a change in our tax rates. That means asking voters to go to the polls and vote in a tax rate election. If approved, the district's rate would still be considerably lower, than it was just three years ago."

https://www.ethics.state.tx.us/filinginfo/Advocating_Passage_or_Defeat_of_a_Measure.pdf

Remember: No matter how much factual information about the purposes of a bond election is in a communication, *any amount of advocacy is impermissible.*

https://www.ethics.state.tx.us/pamphlet/B09pad_sch.html

ATTACH ADDITIONAL PAGES AS NEEDED

Public funds may be used to distribute information unless an officer or employee of the district authorizing such use of public funds knows that the brochure **contains false information**. 255.003(b-1) (ETHICS ADVISORY OPINION NO. 487, 490, 526, 531, 538)

The Lovejoy ISD Superintendent reports to the Lovejoy ISD School Board and he acts with their authorization. It is reasonable to conclude that the School Board which approves the Superintendent salary and the Superintendent himself knew that key information included in the video was false.

A public information request shows that salaries were not frozen at any time during that time period. In an earlier mass email, the superintendent clarifies the meaning of this statement further in saying "[We have avoided a tax increase during this time by: ...freezing all salaries..](#)" (3) and "[We have frozen teacher pay along with ALL other positions for 4 of the last 6 years.](#)" (3)

The Superintendent salary was never frozen. Most teachers' salaries were raised every year.

Ted Moore Salary (TEA <https://rptsvr1.tea.texas.gov/adhocrpt/adpea.html>)

2011-2012	\$205,000
2012-2013	\$220,423
2013-2014	\$231,544
2014-2015	\$256,826
2015-2016	\$265,688

The Lovejoy ISD Trustees are contractually required to notify the Superintendent of any complaints. Scott Christianson, Lovejoy ISD Trustee, and an attorney was notified that the video produced with public funds and sent using the district email system included false information about salaries being frozen. I informed him that the video was a violation of Statute 255.003, and as an attorney, he should have been able to locate and understand it. He is contractually required to notify the Superintendent.

<https://1.cdn.edl.io/XoffdIRZlbG1fvfyGJw2kikXQicZEYNUbN7WhADZYtycMcfw.pdf>

Section 2.6 Criticisms, Complaints, Suggestions (Contract Pg 2) (Document Pg 9)

The Lovejoy School Board authorized the creation and continued distribution of political advertisement in the form of the \$4325 video distributed in Email Express emails from the superintendent which were also placed on the district website.

The Superintendent used his publically funded time to write and distribute other emails which advocate for the passage of the TRE and included a link to the \$4325 video.

When he used the publically funded research into parent voter turnout he discovered that his target market, the parents, were not turning out as he directed. In the May 12th and May 18th emails he strongly advocates for the passage for the TRE by threatening parents with cuts never before mentioned.

ADVOCATING BY BASELESS THREATS

In his communication May 12th and 18th the threats to cut program, sports, busing etc., clearly is meant to advocate for the passage of the TRE and while these cuts are completely arbitrary, prior statements show that they are false.

IN May 18th Email Express, the Superintendent shows us the math that proves the threatened cuts are false information. ***"If the TRE is approved by our voters, the M&O tax rate will increase from \$1.06 to \$1.17. This tax rate will bring almost \$2 million of additional money to our school district.***

Pass along a 3% raise to our teachers to ensure the Lovejoy teacher pay scale is competitive with surrounding districts (\$885,000) Add additional positions to support enrollment growth including: (\$580,000) Return 5% (\$315,000) to all operating budgets"

This adds up to \$1.78 Million of the ~ \$2Million generated by passage of the TRE.

If the TRE does not pass, that would mean that teachers would NOT get a 3% raise, additional positions would NOT be added and \$315,000 would NOT be returned to all operating budgets.

Continued cutting would NOT be necessary as threatened by the Superintendent.

Before the May 21st TRE Election was called, in a March 22, 2016 Presentation to a group of parents (before the TRE election was called) the cuts presented do not match the early-voting-time- frame cuts Lovejoy ISD Superintendent claimed would happen if the TRE did not pass. The disparity highlights the untruthfulness of the claimed punitive cuts used to threaten parents into voting for the TRE.

There is no evidence or justification for the threats of the stated draconian cuts.

Nothing advocates FOR a measure more than threats to children.

LISD Cuts needed without TRE passage BEFORE calling Election: Page 21 March 22, 2016 Presentation	LISD Cuts needed without TRE passage during early voting, after only "6% of the LISD parent community has voted" May 12, 2016 Email Express
<ul style="list-style-type: none"> • 8 Period Day – Lovejoy High School • 8 Period Day – Willow Springs Middle School • Assistant Principals at Elementary Schools • Counselors at Elementary Schools • Campus Receptionists • Center for Academic Training • Conference Period Structure • Curriculum Content Coordinators • Digital Literacy Coaches • Double Blocking English & Math • Gifted & Talented Pullout Program • Library Media Personnel Design • Nursing Structure • Special Education Services • Transportation 	<p>Eliminate all middle school athletics except volleyball, basketball, football, and X-country/track</p> <p>Eliminate the number of sub-varsity athletic teams at Lovejoy High School</p> <p>Eliminate the number and scope of fine arts productions at Willow Springs Middle School</p> <p>Limit the travel distance and overnight stays for students competing in <u>athletic</u> and <u>academic</u> competitions</p> <p>Charge students a "pay to play" fee for extra and co-curricular activities (Athletics and Fine Arts)</p> <p>Eliminate or reduce bus service for students to and from school (Big Ticket item)</p> <p>Eliminate elementary assistant principal position</p> <p>Raise class size averages in grades 5-12 from 25:1 to 30:1</p> <p>Institute a Reduction in Force (RIF) as part of raising the class size averages to reduce the number of teachers</p> <p>Institute the process to transfer new students from their home elementary school to available seats at other schools prior to adding any new teaching positions</p> <p>Charge the cafeteria budget for the utilities/custodial services used, which would trigger an increase in school lunch prices</p> <p>Eliminate the STEM offerings at the Sloan Creek Intermediate School</p> <p>Reduce the number of STEM offerings at Willow Springs Middle School</p> <p>Institute a shared model at the 3 elementary campuses for specials to include: music, art, and PE (example: 2 positions shared between 3 campuses)</p> <p>Institute a shared model for counselors and nurses at the 3 elementary campuses (example: 2 positions shared between 3 campuses)</p> <p>Eliminate the receptionist position at the elementary, intermediate, and middle school campuses</p>

Lovejoy ISD CFO Video

Shay Adams, Lovejoy ISD CFO, made a Video using public funds (her salary) to advocate for the passage of the TRE. This video was distributed by the Superintendent whose salary is also publically funded in a mass email May 11th Email Express which was posted to the district website.

Shay: *"Why is there a need for additional funding? The quick and simple answer is that we want to continue to provide the same level of **quality programing** and **staff ratios** that have **proven so successful for the education of our students**. In order to accomplish this, we seek to pass on a 3% increase in pay for our teachers and staff. The cost for that increase is about \$885,000. 74% of that amount is for our instructional staff.*

To accommodate the growing enrollment we also need to add about 12 new positions to the budget. These are primarily classroom teachers, but also include custodians to clean the facilities and bus drivers for additional routes.

With the need for almost \$2Million in additional expenditures comes the need for additional revenue.

.....

The 11 cent TRE will fund additional expenditures."

<https://www.youtube.com/watch?v=IKRjofa3NkQ&feature=youtu.be>

"After examining our options and each department's budget, we are left with only one way to generate the monies needed to continue programs and services that are essential to our students' success. We must have a change in our tax rates.

That means asking voters to go to the polls and vote in a tax rate election. If approved, the district's rate would still be considerably lower, than it was just three years ago."

TEC example of **Advocating Passage or Defeat of a Measure**

HOW IS ACCESS TO A TEACHER'S LOUNGE DIFFERENT THAN ACCESS TO DISTRICT DATA & STAFF?

In the 11 cent TRE election only Lovejoy ISD superintendent could direct the Asst. Superintendent and other staff in voter research. Dennis Womack used publically funded time to complete parent turnout voter research which was then used by the Superintendent to sway the population most likely to vote FOR the TRE. *"To date, 6% of the LISD parent community has voted"* May 11th Email Express

The PAC opposed to the TRE did not have equal access to that staff time for research or the data the school is in possession of. For example, the opposition PAC could not direct Dennis Womack to complete voter research on voters who did not have children in the district- the AGAINST PAC's target voter base.

In Ethics Advisory 443 since all candidates did not have access to the teacher lounge for candidate handouts, the TEC states that prevention of favoritism of one political view or another was at least one purpose of 255.003.

The requestor argues, however, that the restriction in section 255.003 should not apply in a case in which any candidate has the same opportunity to make use of school district resources for the dissemination of political advertising.¹ That interpretation assumes that the only purpose of section 255.003 is to prevent a political subdivision from favoring one candidate or one political point of view over another. It is likely that prevention of such favoritism was at least one purpose of section 255.003.

Ethics Advisory 343 states:

Excluding candidates from a candidate forum makes the forum itself a communication in support of those included because the exclusion of certain candidates lends the sponsor's tacit support to those included as the candidates worthy of consideration by the audience.

Administrators doing voter research might not be under the scope of 255.003, but it seems to cross the line when that expenditure of funds for that research, beyond the basic cost of hardware messaging software and bandwidth is used by the Superintendent to sway the population most likely to vote FOR the TRE. By notifying the parents that their turnout was abysmal, he is advocating FOR the population most likely to pass the TRE to get out and vote.

In addition the opposing PAC and general public did not have shared access to that research or the staff time or parent/child data or district emails.

In filing a public information request for parent emails, the district denied that request. A public information request for the reports produced by Dennis Womack and other staff, would not have been made available for 10 business days, long after the election. Therefor the district has access to information and staff time that is not available to the public which was used

to advocate for the passage of the TRE by directing the population most likely to vote for the TRE to get out and vote. The PAC opposing the TRE did not have the same access to voter analysis, Lovejoy email systems, or email addresses. Nor could the opposing TRE PAC direct Dennis Womack, Lovejoy ISD Asst. Superintendent, to provide a report of all voters who did not have children in the district and their addresses and whether or not they had voted. This is the population that the opposing PAC needed to get out to vote.

In a 1992 advisory opinion, the TEC concluded that the “spending” of public funds included the use of school district employees’ work time as well as the use of existing school district equipment. [Ethics Advisory Opinion No. 45](#) (1992).

The “issue here is whether school resources may be used for political advertising if all candidates have the same opportunity to make use of school resources for political advertising.” (ETHICS ADVISORY OPINION NO. 343)

“The use of school district resources to disseminate political advertising is a use “for” political advertising. The requestor argues, however, that the restriction in section 255.003 should not apply in a case in which any candidate has the same opportunity to make use of school district resources for the dissemination of political advertising.⁴ That interpretation assumes that the only purpose of section 255.003 is to prevent a political subdivision from favoring one candidate or one political point of view over another. It is likely that prevention of such favoritism was at least one purpose of section 255.003. The broad language of section 255.003, however, applies to any use of a political subdivision’s resources for political advertising, and there is no language to suggest that a political subdivision may use public resources for political advertising if the political subdivision itself does not show a preference for political advertising from a particular source.” (ETHICS ADVISORY OPINION NO. 443)

As in opinion 343 and 443, the general public and those opposed to the TRE did not have the same opportunity to make use of school resources, school staff, school emails and school research to advocate AGAINST the TRE.

V. LISTING OF DOCUMENTS AND OTHER MATERIALS

List all documents and other materials filed with this complaint. Additionally, list all other documents and other materials that are relevant to this complaint and that are within your knowledge, including their location, if known.

Please completely fill out this form. Failure to complete this form properly will cause your complaint to be noncompliant and rejected.

CD containing digital files: video, public information request, district emails

Documents:

#1 Tax Ratification Election 2016 Frequently Asked Questions

..."the district has managed the last 6 years without seeking a tax increase by freezing salaries, cutting positions"

"Has the superintendent received a pay increase every year. No"

The superintendent has received raises every year.

#2 - Paper copy of video screen print claiming that "Over the last five years the district as frozen salaries and reduced staff" Actual video can be watched from CD.

#3 Email Express April 6, 2016 from LISD Superintendent stating

"We have avoided a tax increase during this time by:.....reducing staff, freezing ALL salaries...."

"We have frozen teacher pay along with all other positions for 4 of the last 6 years. "

The stated purpose of the 11 cent tax increase election "if approved by our voters, will be used to fund a teacher pay raise and other operational costs for the 2016-2017 school year."

"I will recommend that we pass along a raise to our teachers that will use up almost 50% of the additional money from the increased taxes.

#4 Email Express April 20, 2016 from LISD Superintendent included link to video which publishes a statement which he knows is false,

"Over the last five years the district as frozen salaries and reduced staff"

#5 Email Express April 27, 2016 from LISD Superintendent included link to video which publishes a statement which he knows is false,

"Over the last five years the district as frozen salaries and reduced staff"

#6 Email Express May 4, 2016 from LISD Superintendent included link to video which publishes a statement which he knows is false,

"Over the last five years the district as frozen salaries and reduced staff"

#7 Email Express May 11, 2016 from LISD Superintendent refers to taxpayer-funded election research and included link to video which publishes a statement which he knows is false, "Over the last five years the district as frozen salaries and reduced staff".

The Lovejoy superintendent has not notified the general community of taxpayers, only those in the community with children attending Lovejoy schools. He makes it clear in this email that it is the 'parent community' he is targeting with his "Get Out The Vote" campaign utilizing taxpayer dollars and taxpayer-funded equipment and highly paid staff to do voter turnout research.

*"We have now passed **the half-way mark in early voting in the Tax Ratification Election (TRE). To date, 6% of the LISD parent community has voted.** The Board of Trustees called this election to give our community the choice to either cut existing programs, or to increase the tax rate. Both are hard choices, and we are hopeful that we will receive a clear direction from the community on this issue."*

8 Puster Elementary Email - Kevin Parker

Used school email to distribute video with false information, "Over the last five years the district as frozen salaries and reduced staff".

#9 Willow Springs Middle School Email - Kent Messer May 12, 2016

Used school email to distribute video with false information, "Over the last five years the district as frozen salaries and reduced staff".

#10 Sloan Creek Middle School Email - Mr. Winkler May 13 & 19, 2016

Used school email to distribute video with false information, "Over the last five years the district as frozen salaries and reduced staff".

#11 Lovejoy Elementary Email - Wendy Craft May 19, 2016

Used school email to distribute video with false information, "Over the last five years the district as frozen salaries and reduced staff".

#12 Hart Elementary Email - Kathy Foster May 20, 2016

Used school email to distribute video with false information, "Over the last five years the district as frozen salaries and reduced staff".

#13 Teacher Salary Analysis from 2011-2016 which shows most teachers in the district during this time period received salary increases every year. **Salaries were never frozen for teachers or administration as claimed repeatedly in district Emails.**

14 All Salaries 2011-2016 – Response to a Public Information Request

#15 Parent voter turnout analysis completed by Lovejoy ISD Administrator, Dennis Womack (\$152,471 salary) or other taxpayer-funded staff using taxpayer funded equipment.
(Right click on open document; choose document properties)

The image shows a 'Document Properties' dialog box with two tabs: 'Description' and 'Advanced'. The 'Description' tab is active and contains the following information:

- File: HESNotVotedAnalysis5.18.2016.pdf
- Title: (empty text box)
- Author: Dennis Womack
- Subject: (empty text box)
- Keywords: (empty text box)
- Created: 9/20/2016 11:45:13 AM
- Modified: 9/20/2016 11:46:04 AM
- Application: Microsoft® Excel® 2016

There is an 'Additional Metadata...' button to the right of the 'Created' and 'Modified' fields. The 'Advanced' tab is partially visible and contains the following information:

- PDF Producer: Microsoft® Excel® 2016
- PDF Version: 1.6 (Acrobat 7.x)
- Location:
- File Size: 344.92 KB (353,200 Bytes)
- Page Size: 8.50 x 11.00 in
- Number of Pages: 3
- Tagged PDF: Yes
- Fast Web View: No

At the bottom of the dialog box are buttons for 'Help', 'OK', and 'Cancel'.

#16 Emails Threatening Parents

Email Express May 12 Includes a link to the video which publishes a statement which he knows is false, ""Over the last five years the district as frozen salaries and reduced staff".

The email also includes a long list of extensive cuts meant to motivate parents to vote FOR the tax increase. The cuts mentioned deviated from all communication with the board and community prior to calling for the election – just a few of which include eliminating sports programs; sub varsity athletic teams; charging students to pay to play, bus service.

#17 Second Threatening Email three days before Election Day

Email Express May 18 includes a carrot and a stick.

The Carrot: If the TRE passes:

Raise for the teachers

Additional teachers

More dollars for operating budgets

The Stick: (The message to parents is clear...VOTE or ELSE your children will be punished!)

If the TRE fails because "**As of today ~ 20% of Lovejoy parents have taken the opportunity to vote in the Tax Ratification Election.**" The list of potential cuts is as follows:

Extracurricular

- Eliminate all middle school athletics except volleyball, basketball, football, and X-country/track
- Eliminate the number of sub varsity athletic teams at Lovejoy High School
- Eliminate the number and scope of Fine Arts productions at Willow Springs Middle School
- Limit the travel distance and overnight stays for students competing in athletic and academic competitions
- Charge students a "pay to play" fee for extra and co-curricular activities (Athletics and Fine Arts)

District-Wide Services

- Eliminate or reduce bus service for students to and from school (\$500,000 potential savings)
- Charge the cafeteria budget for the utilities/custodial they use, which would trigger an increase in school lunch prices

Elementary School

- Eliminate elementary assistant principal position
- Institute a shared model at the 3 elementary campuses for specials to include: music, art, and PE (example: 2 positions shared between 3 campuses)
- Institute a shared model for counselors and nurses at the 3 elementary campuses (example: 2 positions shared between 3 campuses)
- Eliminate the receptionist position at the elementary, intermediate, and middle school campuses
- Transfer new students from their home elementary school to available seats at other Lovejoy schools to avoid adding new teacher positions

Intermediate, Middle and High School

- Raise class size averages in grades 5-12 from 25:1 to 30:1
- Institute a Reduction in Force (RIF) as part of raising the class size averages to reduce the number of teachers
- Eliminate the STEM offerings at Sloan Creek Intermediate School
- Reduce the number of STEM offerings at Willow Springs Middle School

#18 Special Election Costs to taxpayers which included Rolling Polls and this year's uniform election costs.

#19 Public information request and the documents responsive to that request that show that the State of Texas has reduced funding to Lovejoy ISD by \$2Million every year.

The documents fail to show that.

Several emails from the Lovejoy superintendent making the claim that the state has taken away \$2 Million from the district every year.

#20 Budget Workshop February 17, 2016 Slide 22 – **“Historically, new legislation has rewarded districts that tax the maximum amount available by law with higher new funding.”**

#21 Presentation to parents March 22nd detailing proposed cuts which do not match the cuts threatened in communications during early voting.

#22 Request to the Lovejoy School Board President, Ann Casey to notify the public of the election.

#23 Scott Christiansen post on NEXTDOOR stating he was aware that Lovejoy could have used the Lucas Newsletter to notify the general public of the TRE election.

#24 Comments from citizens concerned about the passage of the TRE and cuts to programs showing how effect the district narrative was, even though it was mostly false.

#25 Invoice for the Video stating “**over the last five years the district has frozen salaries**”.

VI. AFFIDAVIT

BASED ON PERSONAL KNOWLEDGE

(Execute this affidavit if the acts alleged are within your direct personal knowledge.)

Please completely fill out this form. Failure to complete this form properly will cause your complaint to be noncompliant and rejected.

I, Brenda Rizos, 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 _____
(Complainant)

_____, 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, _____, 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

Signature of Complainant

AFFIX NOTARY STAMP / SEAL ABOVE

Sworn to and subscribed before me, by the said _____, this the _____ day of _____
(Complainant)

_____, 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

A COMPLAINT WILL BE DISMISSED IF A COPY OF ONE OF THE FOLLOWING DOCUMENTS IS NOT ATTACHED AS PROOF OF TEXAS RESIDENCY OR OWNERSHIP OF REAL PROPERTY IN TEXAS.

***** Please check one of the boxes below to indicate the copy of the document you have attached to the complaint:

Texas driver's license

personal identification certificate
(issued under Chapter 521 of the Transportation Code)

commercial driver's license
(issued under Chapter 522 of the Transportation Code)

utility bill *

bank statement *

government check *

paycheck *

other government document *

property tax bill, notice of appraised value, or other government document that shows the name of the complainant, shows the address of real property in Texas, and identifies the complainant as the owner of the real property.

* with name and address of complainant and dated not more than 30 days before the date on which the complaint is filed *

Initial notices of a complaint must be sent to the complainant and respondent by certified mail. If you wish to waive that requirement, please fill out the following waiver form:

WAIVER OF NOTICE BY CERTIFIED MAIL REQUIREMENT

I waive the requirement that written notices addressed to me concerning any pending sworn complaint be sent by registered or certified mail, restricted delivery, return receipt requested.

I understand that I may withdraw this waiver by written notice to the executive director of the Ethics Commission.

I further understand that the commission will send all written notices to me by first class mail unless the commission's staff and I agree on an alternative means.

I also understand that the commission retains the right to mail any notices to me by more restrictive means than first class mail if the commission in its directions determines it is warranted.

Brenda Rizos

Print Name

Brenda4LISDKids@gmail.com or Brenda@sitetosite.com

Alternate Email Address for Notices (optional)

Signature

Date