

# TEXAS ETHICS COMMISSION

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

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November 8, 2022

Ms. Kimberley Allen  
Director, Power the Vote, Inc.

**SENT BY EMAIL**

**Re: Notice of Complaint, SC-32211423**

Dear Ms. Allen:

We received sworn complaint SC-32211423 on November 2, 2022. The sworn complaint alleges that Power the Vote, Inc., a Delaware corporation, made a political contribution to Power the Vote – Texas, Inc., a Texas general-purpose political committee, in violation of Sections 253.003 and 253.094 of the Election Code.

**The Texas Ethics Commission (Commission) accepts jurisdiction over this allegation. This does not mean that the Commission has found that a violation occurred.** It means that the sworn complaint meets the Commission's legal and technical form requirements for accepting jurisdiction.

***The sworn complaint allegation will be processed as a Category Two violation. Under the law the respondent is required to respond to the allegation not later than 25 business days from the date you receive this notice. Failure to respond will constitute a separate violation for which a separate civil penalty may be assessed.***

The response must be in writing, admit or deny the allegation, and be signed by a representative of the respondent, Power the Vote – Texas, Inc. If the response denies the allegation, then the response should include evidence supporting the denial. The response must include any challenge the respondent seeks to raise to the Commission's exercise of jurisdiction. The response should be under oath. We have enclosed an affidavit form that the respondent's representative may wish to use for the response. If you have any information relevant to the complaint, please provide it at this time. Also, please be advised that you should preserve all documents and evidence related to the allegation in this complaint.

[www.ethics.state.tx.us](http://www.ethics.state.tx.us)

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To comply with legal requirements regarding the initial notice of a sworn complaint, I have also included a copy of the sworn complaint, the Commission's sworn complaint rules, a Statement of Respondent's Rights, and a copy of the relevant statutes of the Election Code. More information about the complaint process is available on the Commission's website at [www.ethics.state.tx.us](http://www.ethics.state.tx.us).

Please note that at this stage in the process, Commission members and staff are required by law to keep the complaint and all documents relating to it strictly confidential.

Please contact me if you have any questions.

Sincerely,

*/s/ Jordan T. Hunn*

Jordan T. Hunn  
Deputy Director of Enforcement

Jurisdiction accepted  
For the Texas Ethics Commission

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J.R. Johnson  
Executive Director

JTH:mc

Enclosures: Copy of Sworn Complaint  
Commission Rules Concerning Sworn Complaints  
Statement of Respondent's Rights  
Relevant Statutes  
Affidavit (for respondent only)

c: Mr. Mark McCaig

**SENT BY EMAIL**