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Digitally signed  
by Kathryn Ross  
Date: 2020.04.18  
02:49:18 -04'00'

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[jerad@najvarlaw.com](mailto:jerad@najvarlaw.com)

April 17, 2020

Federal Election Commission  
Office of Complaints Examination and Legal Admin.  
Attn: Kathryn Ross, Paralegal  
Via email: [cela@fec.gov](mailto:cela@fec.gov)

**RE: MUR 7709**

Dear Ms. Ross:

I write on behalf of my clients, Troy Nehls and Chad Norvell, in response to MUR 7709. This complaint consists of two submissions from the same complainant, both dated February 19, 2020.

With respect to the advertisement in the February edition of the *Fort Bend Business Journal*, the “paid for by” statement was inadvertently omitted. This ad was placed at the early stages of the campaign. The campaign has since established an internal review process to ensure such an omission does not occur again. The *Fort Bend Business Journal* is published and distributed to local businesses monthly, so the February issue should no longer be in active circulation. While the disclaimer was inadvertently omitted, the content of the advertisement leaves no doubt as to who placed it, given the repeated references to the campaign and the display of the [Nehlsforcongress.com](http://Nehlsforcongress.com) URL.

With respect to the \$2,700 contribution Nehls for Congress reported as from “Trevor Nehls,” upon review, confusion arising from state law governing state campaign reports may have contributed to the manner in which this contribution was reported. Trevor Nehls (respondent Troy Nehls’ brother) currently serves as a constable in Fort Bend County, and is a candidate for Sheriff of Fort Bend County. This contribution was made from Trevor Nehls’ campaign account. Nonfederal candidates in Texas are required by Texas law to appoint a campaign treasurer and file reports of campaign activity *under their own name*, as a candidate (or officeholder, as applicable). Tex. Elec. Code §§ 252.001, 254.063, 254.064. Nonfederal candidates in Texas must file these reports under their own name regardless of whether they establish any separate political committees. See Tex. Ethics Com’n, *Campaign Finance Guide for Candidates and Officeholders Who File With Local Filing Authorities* (rev. Jan. 1, 2020) at 3 (“Often a candidate or officeholder chooses to establish a specific-purpose political committee. A political committee is subject to *separate* filing requirements. Establishing a specific-purpose political committee does not relieve a candidate or officeholder of the obligation

to file as an individual.”)<sup>1</sup> Trever Nehls reports his campaign activity on the required “Candidate/Officeholder Campaign Finance Report” form, as reflected on the first page of Complainant’s Exhibit A. The form reflects that Trever Nehls reports as the candidate under his individual name. Hence, it was accurate to report the contributor as “Trever Nehls,” although it is true that this should have been reported on line 11c since it is from a nonfederal committee account. Nehls for Congress will amend its Year End report accordingly.

In addition, Nehls for Congress is refunding \$2,700 to Trever Nehls’ campaign, at Trever Nehls’ request.

With regard to the four-page mailpiece,<sup>2</sup> the last page constitutes advocacy for Trever Nehls for Sheriff, and was an in-kind contribution to Trever Nehls’ campaign. Nehls for Congress reported it as such. The in-kind proportion of this mailpiece is itemized on Schedule D on Nehls for Congress’s pre-primary report as a debt to Axiom Strategies, transaction SD10.5346.<sup>3</sup> Therefore, this contribution was properly reported; Complainant apparently overlooked it.

Complainant correctly observes that Troy Nehls’ state campaign made a \$1,000 contribution to Chad Norvell’s state campaign. Compl. ¶ 9. Complainant seems unaware that Chad Norvell is a candidate for constable of Fort Bend County, and this contribution was made in compliance with Texas law and properly reported, which is why Complainant is aware of all the relevant facts. See **Exhibit A** (Chad Norvell state campaign finance report). This was a contribution toward Norvell’s constable campaign, as reflected in both Troy Nehls’ and Chad Norvell’s reports. Complainant has no basis for her speculation that this was a payment for Norvell’s service as treasurer.

Finally, Complainant correctly notes that Troy Nehls made a \$10,000 contribution from his state campaign account to Trever Nehls’ state campaign account. Complaint ¶ 7. This contribution was reported on both Troy’s and Trever’s campaign finance reports filed pursuant to Texas law. This contribution was and is fully compliant with Texas law and raises no issues under federal law.

In sum, the *Fort Bend Business Journal* advertisement lacked the disclaimer as an oversight. The campaign has instituted a more robust internal review process to help ensure this does not occur again, and the advertisement—by its nature of short duration—is no longer in active circulation. As to the \$2,700 contribution received from Trever Nehls’ state campaign account, it is accurately reported as from “Trever Nehls,” the reporting candidate under state law, but Nehls for Congress acknowledges that it should have been reported under line 11c instead of line 11a. We are making that

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<sup>1</sup> [https://www.ethics.state.tx.us/data/resources/guides/coh\\_local\\_guide.pdf](https://www.ethics.state.tx.us/data/resources/guides/coh_local_guide.pdf) (last visited Apr. 17, 2020).

<sup>2</sup> Complainant’s Exhibit C (pages 92-94 of the Complaint PDF), discussed in Complaint ¶¶ 32-36.

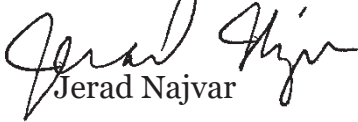
<sup>3</sup> Nehls for Congress has made other in-kind contributions to Trever Nehls’ campaign, and has consistently reported them as in-kinds. See Nehls for Congress’s pre-primary report, transactions SB17.5422 and SB17.5436.

Najvar Law Firm

amendment. The remainder of the complaint lacks any merit whatsoever. We properly reported the in-kind portion of the mailpiece, and the remaining allegations concern legal activity under Texas law that have nothing to do with Nehls for Congress or with federal law.

Please let me know if I can be of further assistance.

Very respectfully,



Jerad Najvar

Encl.

# CANDIDATE / OFFICEHOLDER CAMPAIGN FINANCE REPORT

FORM C/OH  
COVER SHEET PG 1

The C/OH Instruction Guide explains how to complete this form.		1 Filer ID (Ethics Commission Filers)		2 Total pages filed: <div style="font-size: 2em; text-align: center;">7</div>															
3 CANDIDATE / OFFICEHOLDER NAME	MS / MRS / MR  <div style="font-size: 1.5em;">MR</div>	FIRST  <div style="font-size: 1.5em;">CHAD</div>	MI  <div style="font-size: 1.5em;">G.</div>	<b>OFFICE USE ONLY</b>  Date Received   <div style="font-size: 1.5em;">REC'D-BBM-80</div> <div style="font-size: 1.2em;">JAN 15 2020</div>  FORT BEND COUNTY ELECTIONS  Date Hand-delivered or Date Postmarked  <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">Receipt #</td> <td style="width:50%;">Amount \$</td> </tr> <tr> <td colspan="2">Date Processed</td> </tr> <tr> <td colspan="2">Date Imaged</td> </tr> </table>		Receipt #	Amount \$	Date Processed		Date Imaged									
	Receipt #	Amount \$																	
Date Processed																			
Date Imaged																			
NICKNAME  <div style="font-size: 1.5em;">NOLVEL</div>	LAST  	SUFFIX  																	
4 CANDIDATE / OFFICEHOLDER MAILING ADDRESS  <input type="checkbox"/> Change of Address	ADDRESS / PO BOX; APT / SUITE #; CITY; STATE; ZIP CODE  <div style="font-size: 1.2em;">28010 WIND HAWK DR</div> <div style="font-size: 1.2em;">KATY, TX 77494</div>																		
5 CANDIDATE / OFFICEHOLDER PHONE	AREA CODE PHONE NUMBER EXTENSION  <div style="font-size: 1.2em;">(281) 665-0563</div>																		
6 CAMPAIGN TREASURER NAME	MS / MRS / MR  	FIRST  <div style="font-size: 1.5em;">MANDI</div>	MI  																
NICKNAME  <div style="font-size: 1.5em;">BRONSELL</div>	LAST  	SUFFIX  																	
7 CAMPAIGN TREASURER ADDRESS  (Residence or Business)	STREET ADDRESS (NO PO BOX PLEASE); APT / SUITE #; CITY; STATE; ZIP CODE  <div style="font-size: 1.2em;">3010 RIVER BEND DR</div> <div style="font-size: 1.2em;">ROSENBERG, TX 77471</div>																		
8 CAMPAIGN TREASURER PHONE	AREA CODE PHONE NUMBER EXTENSION  <div style="font-size: 1.2em;">(281) 282-7476</div>																		
9 REPORT TYPE																			
<table style="width:100%;"> <tr> <td><input checked="" type="checkbox"/> January 15</td> <td><input type="checkbox"/> 30th day before election</td> <td><input type="checkbox"/> Runoff</td> <td><input type="checkbox"/> 15th day after campaign treasurer appointment (Officeholder Only)</td> </tr> <tr> <td><input type="checkbox"/> July 15</td> <td><input type="checkbox"/> 8th day before election</td> <td><input type="checkbox"/> Exceeded \$500 limit</td> <td><input type="checkbox"/> Final Report (Attach C/OH - FR)</td> </tr> </table>						<input checked="" type="checkbox"/> January 15	<input type="checkbox"/> 30th day before election	<input type="checkbox"/> Runoff	<input type="checkbox"/> 15th day after campaign treasurer appointment (Officeholder Only)	<input type="checkbox"/> July 15	<input type="checkbox"/> 8th day before election	<input type="checkbox"/> Exceeded \$500 limit	<input type="checkbox"/> Final Report (Attach C/OH - FR)						
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10 PERIOD COVERED																			
<table style="width:100%;"> <tr> <td style="text-align: center;">Month</td> <td style="text-align: center;">Day</td> <td style="text-align: center;">Year</td> <td></td> <td style="text-align: center;">Month</td> <td style="text-align: center;">Day</td> <td style="text-align: center;">Year</td> </tr> <tr> <td style="font-size: 1.5em;">12</td> <td style="font-size: 1.5em;">9</td> <td style="font-size: 1.5em;">2019</td> <td style="text-align: center;">THROUGH</td> <td style="font-size: 1.5em;">12</td> <td style="font-size: 1.5em;">31</td> <td style="font-size: 1.5em;">2019</td> </tr> </table>						Month	Day	Year		Month	Day	Year	12	9	2019	THROUGH	12	31	2019
Month	Day	Year		Month	Day	Year													
12	9	2019	THROUGH	12	31	2019													
11 ELECTION																			
<table style="width:100%;"> <tr> <td style="width:30%;">           ELECTION DATE            Month    Day    Year  <div style="font-size: 1.5em;">3 / 3 / 20</div> </td> <td style="width:70%;">           ELECTION TYPE  <input checked="" type="checkbox"/> Primary    <input type="checkbox"/> Runoff    <input type="checkbox"/> Other Description  <input type="checkbox"/> General    <input type="checkbox"/> Special         </td> </tr> </table>						ELECTION DATE Month    Day    Year <div style="font-size: 1.5em;">3 / 3 / 20</div>	ELECTION TYPE <input checked="" type="checkbox"/> Primary <input type="checkbox"/> Runoff <input type="checkbox"/> Other Description <input type="checkbox"/> General <input type="checkbox"/> Special												
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12 OFFICE																			
<table style="width:100%;"> <tr> <td style="width:50%;">           OFFICE HELD (if any)         </td> <td style="width:50%;">           13 OFFICE SOUGHT (if known)  <div style="font-size: 1.2em;">FORT BEND COUNTY</div>  <div style="font-size: 1.2em;">PCT. 3 CONSTABLE</div> </td> </tr> </table>						OFFICE HELD (if any)	13 OFFICE SOUGHT (if known) <div style="font-size: 1.2em;">FORT BEND COUNTY</div> <div style="font-size: 1.2em;">PCT. 3 CONSTABLE</div>												
OFFICE HELD (if any)	13 OFFICE SOUGHT (if known) <div style="font-size: 1.2em;">FORT BEND COUNTY</div> <div style="font-size: 1.2em;">PCT. 3 CONSTABLE</div>																		

GO TO PAGE 2





## SUBTOTALS - C/OH

FORM C/OH  
COVER SHEET PG 3

19 FILER NAME

Norvell, CHAD

20 Filer ID (Ethics Commission Filers)

21 SCHEDULE SUBTOTALS  
NAME OF SCHEDULESUBTOTAL  
AMOUNT

1.	<input type="checkbox"/>	SCHEDULE A1: MONETARY POLITICAL CONTRIBUTIONS	\$ 5,300 <sup>00</sup>
2.	<input type="checkbox"/>	SCHEDULE A2: NON-MONETARY (IN-KIND) POLITICAL CONTRIBUTIONS	\$
3.	<input type="checkbox"/>	SCHEDULE B: PLEDGED CONTRIBUTIONS	\$
4.	<input type="checkbox"/>	SCHEDULE E: LOANS	\$
5.	<input type="checkbox"/>	SCHEDULE F1: POLITICAL EXPENDITURES MADE FROM POLITICAL CONTRIBUTIONS	\$ 2,843 <sup>88</sup>
6.	<input type="checkbox"/>	SCHEDULE F2: UNPAID INCURRED OBLIGATIONS	\$
7.	<input type="checkbox"/>	SCHEDULE F3: PURCHASE OF INVESTMENTS MADE FROM POLITICAL CONTRIBUTIONS	\$
8.	<input type="checkbox"/>	SCHEDULE F4: EXPENDITURES MADE BY CREDIT CARD	\$
9.	<input type="checkbox"/>	SCHEDULE G: POLITICAL EXPENDITURES MADE FROM PERSONAL FUNDS	\$ 1,000 <sup>00</sup>
10.	<input type="checkbox"/>	SCHEDULE H: PAYMENT MADE FROM POLITICAL CONTRIBUTIONS TO A BUSINESS OF C/OH	\$
11.	<input type="checkbox"/>	SCHEDULE I: NON-POLITICAL EXPENDITURES MADE FROM POLITICAL CONTRIBUTIONS	\$
12.	<input type="checkbox"/>	SCHEDULE K: INTEREST, CREDITS, GAINS, REFUNDS, AND CONTRIBUTIONS RETURNED TO FILER	\$

## MONETARY POLITICAL CONTRIBUTIONS

## SCHEDULE A1

The Instruction Guide explains how to complete this form.

1 Total pages Schedule A1:

2

2 FILER NAME

NORVELL, CHAD

3 Filer ID (Ethics Commission Filers)

4 Date

12/11/19

5 Full name of contributor

☐ out-of-state PAC (ID#: \_\_\_\_\_)

TREVER J. NEHLS

7 Amount of contribution (\$)

\$1,000<sup>00</sup>

6 Contributor address;

City;

State;

Zip Code

3934 SCENIC ORCHARD RICHMOND, TX 77407

8 Principal occupation / Job title (See Instructions)

CONSTABLE

9 Employer (See Instructions)

FORT BEND COUNTY

Date

12/11/19

Full name of contributor

☐ out-of-state PAC (ID#: \_\_\_\_\_)

TROY E. NEHLS

Amount of contribution (\$)

\$1,000<sup>00</sup>

Contributor address;

City;

State;

Zip Code

4002 SCENIC ORCHARD RICHMOND, TX 77407

Principal occupation / Job title (See Instructions)

SHERIFF

Employer (See Instructions)

FORT BEND COUNTY

Date

12/19/19

Full name of contributor

☐ out-of-state PAC (ID#: \_\_\_\_\_)

EUGENE DENVEALL

Amount of contribution (\$)

\$100<sup>00</sup>

Contributor address;

City;

State;

Zip Code

17226 MESA SPRINGS CT. HOUSTON, TX 77095

Principal occupation / Job title (See Instructions)

DEPUTY

Employer (See Instructions)

FORT BEND COUNTY

Date

12/20/19

Full name of contributor

☐ out-of-state PAC (ID#: \_\_\_\_\_)

JULE BLANNFIELD

Amount of contribution (\$)

\$200<sup>00</sup>

Contributor address;

City;

State;

Zip Code

14506 LAKESIDE VIEW WAY CYPRESS, TX 77429

Principal occupation / Job title (See Instructions)

DEPUTY

Employer (See Instructions)

FORT BEND COUNTY

ATTACH ADDITIONAL COPIES OF THIS SCHEDULE AS NEEDED

If contributor is out-of-state PAC, please see Instruction guide for additional reporting requirements.

## MONETARY POLITICAL CONTRIBUTIONS

## SCHEDULE A1

The Instruction Guide explains how to complete this form.

1 Total pages Schedule A1:

2

2 FILER NAME

Norvell, Chad

3 Filer ID (Ethics Commission Filers)

4 Date

12/21/19

5 Full name of contributor

☐ out-of-state PAC (ID#: \_\_\_\_\_)

THOMAS GOODFELLOW

7 Amount of contribution (\$)

\$500<sup>00</sup>

6 Contributor address;

City;

State;

Zip Code

PO Box 2361 SPRING, TX 77383

8 Principal occupation / Job title (See Instructions)

DEPUTY

9 Employer (See Instructions)

FOLT BEND COUNTY

Date

12/21/19

Full name of contributor

☐ out-of-state PAC (ID#: \_\_\_\_\_)

JAMES MONEY

Amount of contribution (\$)

\$2,500<sup>00</sup>

Contributor address;

City;

State;

Zip Code

404 INSURANCE RD RICHMOND, TX 77469

Principal occupation / Job title (See Instructions)

RETIRED

Employer (See Instructions)

Date

Full name of contributor

☐ out-of-state PAC (ID#: \_\_\_\_\_)

Amount of contribution (\$)

Contributor address;

City;

State;

Zip Code

Principal occupation / Job title (See Instructions)

Employer (See Instructions)

Date

Full name of contributor

☐ out-of-state PAC (ID#: \_\_\_\_\_)

Amount of contribution (\$)

Contributor address;

City;

State;

Zip Code

Principal occupation / Job title (See Instructions)

Employer (See Instructions)

ATTACH ADDITIONAL COPIES OF THIS SCHEDULE AS NEEDED

If contributor is out-of-state PAC, please see Instruction guide for additional reporting requirements.



# POLITICAL EXPENDITURES MADE FROM POLITICAL CONTRIBUTIONS

## SCHEDULE F1

### EXPENDITURE CATEGORIES FOR BOX 8(a)

Advertising Expense  
Accounting/Banking  
Consulting Expense  
Contributions/Donations Made By  
Candidate/Officeholder/Political Committee  
Credit Card Payment

Event Expense  
Fees  
Food/Beverage Expense  
Gift/Awards/Memorials Expense  
Legal Services

Loan Repayment/Reimbursement  
Office Overhead/Rental Expense  
Polling Expense  
Printing Expense  
Salaries/Wages/Contract Labor

Solicitation/Fundraising Expense  
Transportation Equipment & Related Expense  
Travel In District  
Travel Out Of District  
Other (enter a category not listed above)

The Instruction Guide explains how to complete this form.

1 Total pages Schedule F1: <u>1</u>		2 FILER NAME <u>NOVELL, CHAD</u>		3 Filer ID (Ethics Commission Filers)	
4 Date <u>12/30/19</u>		5 Payee name <u>ALLIED SIGNS</u>			
6 Amount (\$) <u>92578.20</u>		7 Payee address: <u>6820 HARWIN</u> City: <u>HOUSTON</u> State: <u>TX</u> Zip Code: <u>77036</u>			
8  PURPOSE OF EXPENDITURE	(a) Category (See Categories listed at the top of this schedule)		(b) Description <u>CAMPAIGN SIGNS</u>		
	(c) <input type="checkbox"/> Check if travel outside of Texas. Complete Schedule T.		<input type="checkbox"/> Check if Austin, TX, officeholder living expense		
9 Complete <u>ONLY</u> if direct expenditure to benefit C/OH					
Date <u>12/30/19</u>		Payee name <u>LOWE'S</u>			
Amount (\$) <u>\$121.30</u>		Payee address: <u>9505 SPRING GREEN</u> City: <u>KATY</u> State: <u>TX</u> Zip Code: <u>77494</u>			
PURPOSE OF EXPENDITURE	Category (See Categories listed at the top of this schedule)		Description <u>T-POSTS, SIGN SUPPLIES</u>		
	<input type="checkbox"/> Check if travel outside of Texas. Complete Schedule T.		<input type="checkbox"/> Check if Austin, TX, officeholder living expense		
Complete <u>ONLY</u> if direct expenditure to benefit C/OH					
Date <u>12/31/19</u>		Payee name <u>FACEBOOK</u>			
Amount (\$) <u>\$144.30</u>		Payee address: <u>1 FACEBOOK WAY, MENLO PARK, CA 94025</u> City: State: Zip Code:			
PURPOSE OF EXPENDITURE	Category (See Categories listed at the top of this schedule)		Description <u>CAMPAIGN PAGE PROMOTION</u>		
	<input type="checkbox"/> Check if travel outside of Texas. Complete Schedule T.		<input type="checkbox"/> Check if Austin, TX, officeholder living expense		
Complete <u>ONLY</u> if direct expenditure to benefit C/OH					
Candidate / Officeholder name Office sought Office held					

ATTACH ADDITIONAL COPIES OF THIS SCHEDULE AS NEEDED

# POLITICAL EXPENDITURES MADE FROM PERSONAL FUNDS

## SCHEDULE G

### EXPENDITURE CATEGORIES FOR BOX 8(a)

Advertising Expense  
Accounting/Banking  
Consulting Expense  
Contributions/Donations Made By  
Candidate/Officeholder/Political Committee  
Credit Card Payment

Event Expense  
Fees  
Food/Beverage Expense  
Gift/Awards/Memorials Expense  
Legal Services

Loan Repayment/Reimbursement  
Office Overhead/Rental Expense  
Polling Expense  
Printing Expense  
Salaries/Wages/Contract Labor

Solicitation/Fundraising Expense  
Transportation Equipment & Related Expense  
Travel In District  
Travel Out Of District  
Other (enter a category not listed above)

The Instruction Guide explains how to complete this form.

1 Total pages Schedule G: <b>1</b>	2 FILER NAME <b>NORVELL, CHAD</b>	3 Filer ID (Ethics Commission Filers)
4 Date <b>12/9/19</b>	5 Payee name <b>FORT BEND COUNTY REPUBLICAN PARTY</b>	
6 Amount (\$) <b>\$1,000.00</b> <input checked="" type="checkbox"/> Reimbursement from political contributions intended	7 Payee address; City; State; Zip Code <b>PO Box 461 SUGAR LAND TX 77487</b>	
8 PURPOSE OF EXPENDITURE	(a) Category (See Categories listed at the top of this schedule) <b>FEES</b>	(b) Description <b>FILING FEE</b>
	(c) <input type="checkbox"/> Check if travel outside of Texas. Complete Schedule T. <input type="checkbox"/> Check if Austin, TX, officeholder living expense	
9 Complete <u>ONLY</u> if direct expenditure to benefit C/OH		
Candidate / Officeholder name Office sought Office held		
Date	Payee name	
Amount (\$) <input type="checkbox"/> Reimbursement from political contributions intended	Payee address; City; State; Zip Code	
PURPOSE OF EXPENDITURE	Category (See Categories listed at the top of this schedule)	Description
	<input type="checkbox"/> Check if travel outside of Texas. Complete Schedule T. <input type="checkbox"/> Check if Austin, TX, officeholder living expense	
Complete <u>ONLY</u> if direct expenditure to benefit C/OH		
Candidate / Officeholder name Office sought Office held		
Date	Payee name	
Amount (\$) <input type="checkbox"/> Reimbursement from political contributions intended	Payee address; City; State; Zip Code	
PURPOSE OF EXPENDITURE	Category (See Categories listed at the top of this schedule)	Description
	<input type="checkbox"/> Check if travel outside of Texas. Complete Schedule T. <input type="checkbox"/> Check if Austin, TX, officeholder living expense	
Complete <u>ONLY</u> if direct expenditure to benefit C/OH		
Candidate / Officeholder name Office sought Office held		

ATTACH ADDITIONAL COPIES OF THIS SCHEDULE AS NEEDED