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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 URL.

With respect to the \$2,700 contribution Nehls for Congress reported as from “Trever Nehls,” upon review, confusion arising from state law governing state campaign reports may have contributed to the manner in which this contribution was reported. Trever 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 Trever 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

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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.

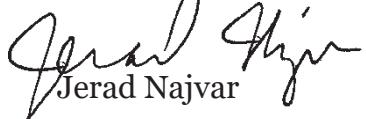
<sup>3</sup> Nehls for Congress has made other in-kind contributions to Trever Nehls’ campaign, and has consistently reported them as in-kinds. See Nehls for Congress’s pre-primary report, transactions SB17.5422 and SB17.5436.

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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: <i>7</i>	
3 CANDIDATE / OFFICEHOLDER NAME	MS / MRS / MR <i>MR</i>	FIRST <i>CHAD</i>	MI <i>G.</i>	OFFICE USE ONLY		
	NICKNAME	LAST <i>NOLVER</i>	SUFFIX	Date Received		
4 CANDIDATE / OFFICEHOLDER MAILING ADDRESS	ADDRESS / PO BOX: APT / SUITE #: CITY: STATE: ZIP CODE <i>28010 WIND HAWK DR KATY, TX 77494</i>				REC'D-BBM-80 JAN 15 2020	
5 CANDIDATE/ OFFICEHOLDER PHONE		AREA CODE <i>(81)</i>	PHONE NUMBER <i>665-0563</i>	EXTENSION	FORT BEND COUNTY ELECTIONS Date Hand-delivered or Date Postmarked	
6 CAMPAIGN TREASURER NAME	MS / MRS / MR <i></i>	FIRST <i>MANDI</i>	MI <i></i>	Receipt #	Amount \$	
	NICKNAME	LAST <i>BRONSEK</i>	SUFFIX	Date Processed		
7 CAMPAIGN TREASURER ADDRESS (Residence or Business)	STREET ADDRESS (NO PO BOX PLEASE): APT / SUITE #: CITY: STATE: ZIP CODE <i>3010 RIVERBEND DR ROSENBERG, TX 77471</i>					
8 CAMPAIGN TREASURER PHONE	AREA CODE <i>(81)</i>	PHONE NUMBER <i>282-7476</i>	EXTENSION			
9 REPORT TYPE	<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)					
10 PERIOD COVERED	Month <i>12</i>	Day <i>9</i>	Year <i>2019</i>	Month <i></i>	Day <i></i>	Year <i></i>
11 ELECTION	ELECTION DATE Month Day Year <i>3 13 20</i>		<input checked="" type="checkbox"/> Primary <input type="checkbox"/> Runoff <input type="checkbox"/> Other Description <input type="checkbox"/> General <input type="checkbox"/> Special			
12 OFFICE	OFFICE HELD (if any)			13 OFFICE SOUGHT (if known) <i>FORT BEND COUNTY PCT. 3 CONSTABLE</i>		

GO TO PAGE 2

# CANDIDATE / OFFICEHOLDER CAMPAIGN FINANCE REPORT

## FORM C/OH COVER SHEET PG 2

14 C/OH NAME	<i>Norvell, Chad</i>		15 Filer ID (Ethics Commission Filers)
16 NOTICE FROM POLITICAL COMMITTEE(S)	<p>THIS BOX IS FOR NOTICE OF POLITICAL CONTRIBUTIONS ACCEPTED OR POLITICAL EXPENDITURES MADE BY POLITICAL COMMITTEES TO SUPPORT THE CANDIDATE / OFFICEHOLDER. THESE EXPENDITURES MAY HAVE BEEN MADE WITHOUT THE CANDIDATE'S OR OFFICEHOLDER'S KNOWLEDGE OR CONSENT. CANDIDATES AND OFFICEHOLDERS ARE REQUIRED TO REPORT THIS INFORMATION ONLY IF THEY RECEIVE NOTICE OF SUCH EXPENDITURES.</p>		
<input type="checkbox"/> Additional Pages	COMMITTEE TYPE <input type="checkbox"/> GENERAL <input type="checkbox"/> SPECIFIC	COMMITTEE NAME	
		COMMITTEE ADDRESS	
		COMMITTEE CAMPAIGN TREASURER NAME	
		COMMITTEE CAMPAIGN TREASURER ADDRESS	
17 CONTRIBUTION TOTALS	1. TOTAL POLITICAL CONTRIBUTIONS OF \$50 OR LESS (OTHER THAN PLEDGES, LOANS, OR GUARANTEES OF LOANS, OR CONTRIBUTIONS MADE ELECTRONICALLY), UNLESS ITEMIZED	\$ —	
EXPENDITURE TOTALS	2. TOTAL POLITICAL CONTRIBUTIONS (OTHER THAN PLEDGES, LOANS, OR GUARANTEES OF LOANS)	\$ <i>5,300 02</i>	
CONTRIBUTION BALANCE	3. TOTAL POLITICAL EXPENDITURES OF \$100 OR LESS, UNLESS ITEMIZED	\$ —	
OUTSTANDING LOAN TOTALS	4. TOTAL POLITICAL EXPENDITURES	\$ <i>3,843 88</i>	
	5. TOTAL POLITICAL CONTRIBUTIONS MAINTAINED AS OF THE LAST DAY OF REPORTING PERIOD	\$ <i>1,617 18</i>	
	6. TOTAL PRINCIPAL AMOUNT OF ALL OUTSTANDING LOANS AS OF THE LAST DAY OF THE REPORTING PERIOD	\$ —	
18 AFFIDAVIT	<p>I swear, or affirm, under penalty of perjury, that the accompanying report is true and correct and includes all information required to be reported by me under Title 15, Election Code.</p> <p><i>Chad Norvell</i></p> <p>Signature of Candidate or Officeholder</p>		
<p>AFFIX NOTARY STAMP / SEAL ABOVE</p> <p>Sworn to and subscribed before me, by the said <u>Chad Norvell</u>, this the <u>14th</u> day of <u>January</u>, 20<u>20</u><u>20</u>, to certify which, witness my hand and seal of office.</p> <p><i>Suzie Lynn Becker</i></p> <p>Signature of officer administering oath</p> <p><i>Suzie Lynn Becker</i></p> <p>Printed name of officer administering oath</p> <p><i>Admin Asst</i></p> <p>Title of officer administering oath</p>			

**SUBTOTALS - C/OH****FORM C/OH  
COVER SHEET PG 3**

19 FILER NAME	20 Filer ID (Ethics Commission Filers)	
Norvell, Chad		
21 SCHEDULE SUBTOTALS NAME OF SCHEDULE	SUBTOTAL AMOUNT	
1. <input type="checkbox"/> SCHEDULE A1: MONETARY POLITICAL CONTRIBUTIONS	\$ 5,300.00	
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	\$ 2,843.88	
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	\$ 1,000.00	
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

TREVOR J. NEHLS

 out-of-state PAC (ID#:

## 7 Amount of contribution (\$)

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

## 6 Contributor address:

City: State: Zip Code

3934 SCENIC ORCHARD RICHMOND, TX 77467

## 8 Principal occupation / Job title (See Instructions)

CONSTABLE

## 9 Employer (See Instructions)

FORT BEND COUNTY

## Date

12/11/19

## Full name of contributor

TROY E. NEHLS

 out-of-state PAC (ID#:

## Amount of contribution (\$)

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

## Contributor address:

City: State: Zip Code

4002 SCENIC ORCHARD RICHMOND, TX 77467

## Principal occupation / Job title (See Instructions)

SHERIFF

## Employer (See Instructions)

FORT BEND COUNTY

## Date

12/19/19

## Full name of contributor

EUGENE DEWVEALL

 out-of-state PAC (ID#:

## Amount of contribution (\$)

\$100<sup>00</sup>

## Contributor address:

City: State: Zip Code

17226 MESA SPRINGS CT. WADSON, TX 77095

## Principal occupation / Job title (See Instructions)

DEPUTY

## Employer (See Instructions)

FORT BEND COUNTY

## Date

12/20/19

## Full name of contributor

JULE BLOOMFIELD

 out-of-state PAC (ID#:

## 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: <i>2</i>
2 FILER NAME <i>Norvell, CHAD</i>			3 Filer ID (Ethics Commission Filers)
4 Date <i>12/21/19</i>	5 Full name of contributor <i>Thomas GoodFellow</i>	<input type="checkbox"/> out-of-state PAC (ID#: _____)	7 Amount of contribution (\$) <i>\$500.00</i>
6 Contributor address; <i>PO Box 2361 SPRINGS, TX 77383</i>			City; State; Zip Code
8 Principal occupation / Job title (See Instructions) <i>DEPUTY</i>		9 Employer (See Instructions) <i>FORT BEND COUNTY</i>	
Date <i>12/21/19</i>	Full name of contributor <i>JAMES MONEY</i>	<input type="checkbox"/> out-of-state PAC (ID#: _____)	Amount of contribution (\$) <i>\$2,500.00</i>
Contributor address; <i>404 INSURANCE RD RAYMOND, TX 77469</i>		City; State; Zip Code	
Principal occupation / Job title (See Instructions) <i>RETIRED</i>		Employer (See Instructions)	
Date	Full name of contributor Contributor address;	<input type="checkbox"/> out-of-state PAC (ID#: _____)	Amount of contribution (\$)
		City; State; Zip Code	
Principal occupation / Job title (See Instructions)		Employer (See Instructions)	
Date	Full name of contributor Contributor address;	<input type="checkbox"/> out-of-state PAC (ID#: _____)	Amount of contribution (\$)
		City; State; Zip Code	
Principal occupation / Job title (See Instructions)		Employer (See Instructions)	
<b>ATTACH ADDITIONAL COPIES OF THIS SCHEDULE AS NEEDED</b> 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:	2 FILER NAME <i>MONVELL, CHAD</i>	3 Filer ID (Ethics Commission Filers)	
4 Date <i>12/30/19</i>	5 Payee name <i>ALLIED SIGNS</i>		
6 Amount (\$) <i>92578.28</i>	7 Payee address: <i>6820 HARWIN</i>	City: <i>HOUSTON</i> State: <i>TX</i> Zip Code <i>77036</i>	
8  <b>PURPOSE OF EXPENDITURE</b>	(a) Category (See Categories listed at the top of this schedule)	(b) Description <i>CAMPAGN SIGNS</i>	
	(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 <i>12/30/19</i>	Payee name <i>LOWE'S</i>		
Amount (\$) <i>12130</i>	Payee address: <i>9505 SPRING GREEN</i>	City: <i>KATY</i> State: <i>TX</i> Zip Code <i>77494</i>	
  <b>PURPOSE OF EXPENDITURE</b>	Category (See Categories listed at the top of this schedule)	Description <i>T-POSTS, SIGN SUPPLIES</i>	
	<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 <i>12/31/19</i>	Payee name <i>FACEBOOK</i>		
Amount (\$) <i>14430</i>	Payee address: <i>1 FACEBOOK WAY MENLO PARK, CA 94025</i>	City:	State: Zip Code
  <b>PURPOSE OF EXPENDITURE</b>	Category (See Categories listed at the top of this schedule)	Description <i>CAMPAGN PAGE PROMOTION</i>	
	<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
<b>ATTACH ADDITIONAL COPIES OF THIS SCHEDULE AS NEEDED</b>			

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

ATTACH ADDITIONAL COPIES OF THIS SCHEDULE AS NEEDED