

**VIA EMAIL**CDennis@fec.govcela@fec.gov

June 28, 2024

Wanda D. Brown, Assistant General Counsel  
Federal Election Commission  
Office of Complaint Examination & Legal Administration  
1050 First Street, NE  
Washington, DC 20463

**Re: MUR 8275**

Dear Ms. Brown,

This letter is intended to provide you with relevant facts and context as you examine MUR 8275. I am no longer Chairman of the Hamilton County Texas Republican Party. My term as Chairman ended on June 17, 2024. However, because I was Chairman during the time period Mr. Michael Williams alleges violations of the Federal Election Campaign Act (FECA) occurred, I am providing you with the following information. I believe that the facts presented in this letter clearly show that my actions did not violate the FECA in anyway.

The Hamilton County Republican Party (HCRP) regularly holds party meetings on the first Monday of most months. Our Monday February 5, 2024, meeting was a regularly scheduled meeting and not a specially scheduled event. Further, no party or personal funds were expended to hold the February 5, 2024, meeting. The meeting space, the St. John Lutheran Church Family Life Center, was provided free of charge because of my membership in the church. The meal that night consisted of "potluck" dishes provided exclusively by the attendees.

Mr. Williams did not speak at our February 5, 2024, meeting for the following two reasons: 1) by the time he initially requested time to speak the meeting agenda was already set, and 2) when he was offered time to speak on the night of the event he responded in a rude and unprofessional manner, causing me to ask him to leave the meeting.

Many candidates and campaign representatives began regularly attending HCRP events in the summer of 2023 in anticipation of the March 5, 2024, primary election. Plans for the February, 2024, HCRP meeting were discussed at the November, 2023, meeting. We did not have a December, 2023, meeting. I again briefly discussed plans for our February, 2024, meeting with several candidates who attended our January, 2024, Sheriff Debate. During the November, 2023, and January, 2024, events several candidates agreed to speak at the February, 2024, meeting. Unfortunately, Mr. Williams never attended a HCRP event during the 2024 primary election campaign season prior to February 5, 2024. Further, Mr. Williams never contacted the HCRP or myself until after the agenda for the February, 2024, meeting was already set.

On January 19, 2024, the agenda for the February 5, 2024, meeting was announced on Facebook (Encl. 1). We had seven candidates slated to speak, and I felt that this was a very full



schedule since we strive to hold our meetings to one hour. The next day Mr. Williams contacted the HCRP for the first time during the 2024 primary election season by posting a comment under our Facebook announcement stating that he would be speaking at the event. I responded to the comment by encouraging him to attend our meeting, but stating that we would not be able to give him speaking time because our schedule for that night was already full (Encl. 2). Mr. Williams then texted me, and I again informed him that our speaking schedule for February 5, 2024, was already full, but that he was welcome to attend the meeting and meet the audience members (Encl. 3).

Over the following days Mr. Williams apparently began contacting officials in the Republican Party of Texas (RPT), demanding that they force me to change the February 5, 2024, meeting agenda to allow him speaking time. A representative of the RPT, Mr. Brandon Moore, contacted me by phone and informed me that my scheduling decisions were not inappropriate or in violation of RPT rules. I stated to Mr. Moore that he should encourage Mr. Williams to attend our meeting, but that it would be unfair for me to take time away from the other candidates after the meeting agenda had already been set.

On January 25, 2024, Mr. Williams, apparently unhappy with the response he received from RPT, filed a complaint against me with the Texas Ethics Commission (TEC) (Encl. 4). TEC promptly found Mr. Williams' complaint to be without merit and dismissed it on January 31, 2024 (Encl. 5). I found Mr. Williams' willingness to file a baseless ethics complaint to be a deeply unprofessional bully tactic.

On February 5, 2024, one of the candidates scheduled to speak canceled their appearance due to a scheduling conflict. Just prior to the start of the HCRP meeting Mr. Williams arrived at our meeting location and again demanded time to speak. I informed Mr. Williams that because one of the other speakers had canceled there would be time for him to speak. However, I also informed Mr. Williams that I found his actions in the leadup to the meeting to be disrespectful and unprofessional and that if he wished to take the stage at our event, he should publicly apologize for filing a baseless ethics complaint. At my request for an apology Mr. Williams became verbally belligerent and stated he would not apologize and suggested he would file civil litigation against me. At this point I told Mr. Williams to leave the premises. As Mr. Williams was leaving, he stated that he would sue me for "one million dollars." After Mr. Williams left, the meeting proceeded as scheduled, and I made no public comments on the incident during or after the meeting.

In the days following the February 5, 2024, meeting, Mr. Williams began circulating a rather bizarre letter to various third parties stating that he intended to sue me personally for \$250,000.00 in compensatory damages and \$1,000,000.00 in punitive damages (Encl. 6). No civil litigation has been filed in this matter, presumably because Mr. Williams is unable to find an attorney willing to make a frivolous claim. Mr. Williams even went as far as to send an email to our local radio station regarding our event entitled "FUBAR in Hamilton County" in which he referred to himself as "The Patriot" and to myself as "arch villain Lucas Robinson" (Encl. 7). It seems clear that from the outset Mr. Williams has been more interested in creating controversy and attention for his campaign than actually speaking at HCRP events.



On May 17, 2024, Mr. Williams again filed a baseless ethics complaint against me with TEC (Encl. 8). In this second complaint Mr. Williams first presented his novel legal theory that the February 5, 2024, HCRP meeting constituted an in-kind donation to his opponents. Once again, TEC promptly dismissed Mr. Williams complaint (Encl. 9).

Mr. Williams' current complaint with your agency is nothing more than a continuation of his pattern of harassment and slander against the HCRP and myself. Mr. Williams' claim that the February 5, 2024, HCRP meeting provided Congressman John Carter with \$6,000 of value is utterly without foundation in reality. Again, no personal or party funds were spent on the February 5, 2024, meeting. Further, several candidates attended the meeting, including several from the U.S. House District 31 race. The idea that this event somehow exclusively benefited the John Carter Campaign is simply untrue. At no time did the HCRP provide, or intend to provide, material support to any candidate in the 2024 primary election.

For the above stated reasons, I respectfully request that you dismiss Mr. Williams' complaint with prejudice.

Please contact me if you believe I am able to provide you with any further information in this matter.

Sincerely,



Lucas Robinson, J.D., LL.M.  
P.O. Box 323  
Hamilton, TX 76531



Enclosures:

- Encl. 1: January 19<sup>th</sup>, 2024 Meeting Announcement
- Encl. 2: Facebook Comments
- Encl. 3: Text Conversation
- Encl. 4: January 25<sup>th</sup>, 2024 TEC Complaint
- Encl. 5: January 31<sup>st</sup>, 2024 TEC Complaint Dismissal
- Encl. 6: Mike Williams Letter
- Encl. 7: Mike Williams Email to KCLW 900AM
- Encl. 8: May 17<sup>th</sup>, 2024 TEC Complaint
- Encl. 9: May 23<sup>rd</sup>, 2024 TEC Complaint Dismissal

1:07

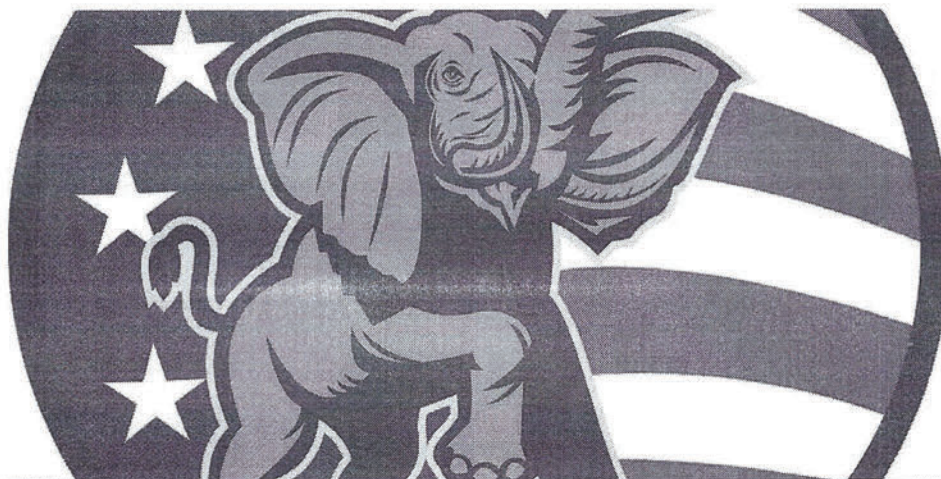


Encl. 1

**Hamilton County TX Republican Party**

Jan 19 · 🌐

Please join us Monday February 5th 6:30pm at St. John Lutheran Church FLC, 122 Cheyenne Mesa Hamilton, TX 76531. We will be hearing from congressional candidates Will Able, Mack Latimer, and Abhiram Garapati. We will also hear from all three candidates for commissioner precinct 3. A potluck meal will be served. We hope to see you all there!



MON, FEB 5

**February 5th Meeting**

St. John Lutheran Church · Hamilton, Texas

19 Went · 44 Interested

Comment as Hamilton County  
TX Republican Party

AA

facebook.com





1:07

Encl. 2



## Replies

**Mike Williams**

Mike Williams 4 TX 31 will be attending as well...

5 mos Like Reply

**Hamilton County TX Republican Party**

Mike Williamsthank you for your interest. You are welcome to attend, however, our speaking schedule is already full for that night.

5 mos Like Reply



Reply as Hamilton County TX  
Republican Party



AA

facebook.com





11:49

Encl. 3

5

MW

Mike

Sat, Jan 20 at 8:54 AM

Lucas can you provide additional info about Fed. 5 candidate fair, is there time to speak at event.

Hi Mike. This is our regularly scheduled monthly meeting, and our last meeting before Election Day. We already have 7 candidates speaking including 4 for district 31. Unfortunately, we do not have time to add another speaker. However you are welcome to attend and meet the audience.

I'm one of the district 31 candidates, are you saying I can't speak?

Sat, Jan 20 at 11:48 AM

Yes sir. I am aware you are a candidate, however we already have 7 speakers scheduled that night, and out of fairness to them I am not going to add another speaker. Our program will likely already go over an hour. But again, you are welcome to attend



11:50



&lt; 5

MW



Mike

I'm one of the district 31 candidates, are you saying I can't speak?

Sat, Jan 20 at 11:48 AM

Yes sir. I am aware you are a candidate, however we already have 7 speakers scheduled that night, and out of fairness to them I am not going to add another speaker. Our program will likely already go over an hour. But again, you are welcome to attend and meet with audience members on your own time if you wish.

Delivered

Sat, Jan 20 at 2:44 PM

So my fellow candidates will be given time to speak but you're denying time to me. Lucas, in the past 2 primaries I received more votes than the other challengers and now I'm not allowed to speak. Says a lot. How about reducing my competitors time and give each of us equal time?



message





# SWORN COMPLAINT BEFORE THE TEXAS ETHICS COMMISSION

Section 571.122 of the Government Code requires that a sworn complaint be filed on a form prescribed by the Texas Ethics Commission and include specific information.

- You must complete a separate sworn complaint form for each respondent.
- You must allege a violation of a law that is within the Texas Ethics Commission's jurisdiction, listed on p. 2. More information and instructions for this form can be found at <https://www.ethics.state.tx.us/tec/sworn.html>.
- A person filing a frivolous or bad faith complaint may be subject to a civil penalty.

**Please completely fill out this form.**

**Failure to complete this form properly will cause your complaint to be noncompliant and returned.**

## OFFICE USE ONLY

Docket Number

**SC-3240146**

Date Hand-delivered or Date Postmarked

**RECEIVED**

**JAN 25 2024**

Texas Ethics Commission

## I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mr	Michael	H
	NICKNAME	LAST	SUFFIX
	Mike	Williams	
2 COMPLAINANT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #	CITY STATE ZIP CODE
	4106 Manzanita Dr. Georgetown TX 78628		
	(Full home or business address, including street, city, state, and zip code)		
3 COMPLAINANT MAILING ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #	CITY STATE ZIP CODE
<input type="checkbox"/> (check if same as above)			
	(Full street or mailing address, including city, state, and zip code)		
4 COMPLAINANT TELEPHONE NUMBER (REQUIRED)	AREA CODE	PHONE NUMBER	EXT
5 COMPLAINANT E-MAIL ADDRESS (REQUIRED IF KNOWN)	mikewilliams31ctx@yahoo.com		

## II. IDENTITY OF RESPONDENT

6 RESPONDENT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mr	Lucas	
	NICKNAME	LAST	SUFFIX
		Robinson	
7 RESPONDENT POSITION OR TITLE (REQUIRED)	Hamilton County Republican Chair		
8 RESPONDENT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #	CITY STATE ZIP CODE
	413 E Hwy 36 Hamilton TX 76531		
	(Full home or business address, including street, city, state, and zip code)		
9 RESPONDENT MAILING ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #	CITY STATE ZIP CODE
<input type="checkbox"/> (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) (if unknown, please state that)	hamiltontexasgop@gmail.com		

**GO TO PAGE 2**



**III. NATURE OF ALLEGED VIOLATION****Page 2**

Include the specific law(s) or rule(s) alleged to have been violated. YOU MUST ALLEGE A VIOLATION OF A LAW THAT IS WITHIN THE COMMISSION'S JURISDICTION. 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 and 2004 of the Gov't Code; (3) § 334.025 and § 335.055 of the Local Gov't Code; (4) 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; and (5) § 2152.064 and § 2152.065 of the Local Gov't Code.

*Please completely fill out this form.*

*Failure to complete this form properly will cause your complaint to be noncompliant and returned.*

I, Mike Williams, am a candidate for Texas CD-31 in the 2024 Republican Primary. I became aware of a Candidate Fair being hosted by the Hamilton County Republicans scheduled for February 5 via Facebook on the morning of January 20. I had been locked out of Facebook for about a week at that point, and set-up a ghost Facebook page so I may monitor events scheduled for the six counties of my district. I routinely check the websites and Facebook pages of my six counties at least twice a week to stay informed.

I texted Mr. Lucas Robinson (Hamilton County Republican Chair) that morning (January 20) at 8:54am to inquire as to details of the Fair. Mr. Robinson replied that it was the last scheduled regular meeting in Hamilton County before election day, and that the speakers list was full and there would be no time allotted for me to speak. He also stated that four of my opponents for TX-31 are on the list of speakers. I offered to have the time of each speaker reduced to afford each candidate present equal time, or cut speaking time for candidates in my race all together, none of these solutions were acceptable to Mr. Robinson. This text thread went on until 2:44pm that afternoon without a satisfactory resolution.

I saw three of my opponents at a Candidate Forum being hosted by some Bell County Republican Precinct Chairs in Temple on the evening of Sunday January 21. I inquired as to how they became aware of the Candidate Fair in Hamilton on February 5; some replied via email and some via Facebook. Mr. Robinson has my email address and phone number; I was not afforded the same level of due diligence from Mr. Robinson as my opponents.

I submit that Mr. Robinson's handling of this matter violates Title 15 Election Code:  
 Sec. 258.002 (b) Code of Fair Campaign Practices... follow the basic principles of fair play to encourage healthy competition and open discussion of issues.  
 Sec. 258.004 (1) Conduct the campaign openly and publicly.

I brought the matter up with the Republican Party of Texas (RPT) via the contact function of their website Monday morning January 22, and followed up with a phone call to RPT speaking with Abby Moore at 1:14pm that afternoon. I followed up with RPT again over the phone and spoke with Jen Hall at 9:59am on January 25, she promised to get back to me in an hour. No word back from RPT, several hours later, with no satisfactory resolution thus far.

Please consider this matter and grant the complainant relief in the nature of all candidates in my race (TX-31) being given equal time to speak at the Hamilton County Candidate Fair, or no candidate in my race being allowed to speak at all.

**ATTACH ADDITIONAL PAGES AS NEEDED**



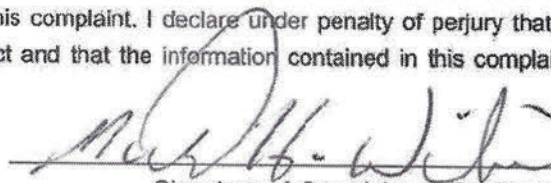
**VI. AFFIDAVIT BASED ON PERSONAL KNOWLEDGE**

Page 5

(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 returned.*

I, Michael H Williams, 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. I declare under penalty of perjury that the foregoing  
 is true and correct and that the information contained in this complaint is true and  
 correct.



Signature of Complainant (Declarant)

In addition to the portion above, please also complete EITHER  
 the Notary section OR the Unsworn Declaration section below.

**NOTARY SECTION**

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

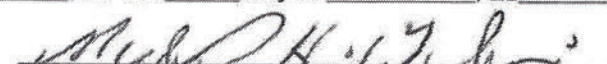
OR

**UNSWORN DECLARATION SECTION**

My name is Michael H Williams, and my date of birth is [REDACTED].

My address is 4106 Manzanita Dr. Georgetown TX 78628 Williamson  
 (street) (city) (state) (zip code) (country)

Executed in Williamson County, State of Texas, on the 25 day of January, 2024.



Signature of Complainant (Declarant)



# TEXAS ETHICS COMMISSION

Encl. 5

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

Randall H. Erben  
Chair

Chris Flood  
Vice Chair

J.R. Johnson  
Executive Director



Commissioners

Chad M. Craycraft  
Mary K. "Katie" Kennedy  
Patrick W. Mizell  
Richard S. Schmidt  
Joseph O. Slovacek  
Steven D. Wolens

January 31, 2024

Mr. Michael H. Williams

**SENT BY EMAIL**

**Re: Notice of Dismissal, SC-3240146**

Dear Mr. Williams:

We received your complaint on January 25, 2024. This complaint does not comply with the legal requirements for a complaint filed with the Texas Ethics Commission (TEC).

The TEC must dismiss a complaint if it does not make an allegation that, if true, constitutes a violation of a law administered and enforced by the TEC. The TEC only has jurisdiction to enforce Title 15 of the Election Code, Chapters 302, 303, 305, 572, and 2004 of the Government Code, Sections 2152.064 and 2155.003 of the Government Code, Sections 334.025 and 335.055 of the Local Government Code, and Subchapter C, Chapter 159, of the Local Government Code. The complaint you filed does not make an allegation that, if true, would constitute a violation of any law enforced by the TEC.

Your complaint appears to allege that the respondent violated certain provisions within Section 258.004 of the Election Code, the Code of Fair Campaign Practices. Subscription to the Code of Fair Campaign Practices by a candidate or a political committee is voluntary, and Chapter 258 of the Election Code is specifically exempt from any civil cause of action or enforcement. Tex. Elec. Code §§ 258.007, 258.009. Therefore, the TEC cannot consider allegations of violations of Chapter 258 of the Election Code. Your complaint does not otherwise make an allegation that would constitute a violation of any other law enforced by the TEC, as the TEC does not enforce any laws that specifically relate to candidate forums and debates.

For the reasons stated above, your complaint is dismissed. If you have any questions about the laws administered and enforced by the TEC, then you may call our main number at (512) 463-5800 and speak with an attorney.

Sincerely,

*/s/ Nicholas Espinosa*

Nicholas Espinosa  
Director of Enforcement



Page 2

FINDING OF NO JURISDICTION:

*/s/ J.R. Johnson*

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J.R. Johnson  
Executive Director

Enclosures: Complaint (original to complainant, copy to respondent)  
Rules Concerning Sworn Complaints

c: Mr. Lucas Robinson

**SENT BY EMAIL**

NE:mc



**Unethical Conduct and Possible Actionable Offence:**

**Plaintiff:** Michael H Williams, 4106 Manzanita Dr. Georgetown TX 78628, [REDACTED]  
mikewilliams31ctx@yahoo.com

Candidate for CD TX-31 (Mike Williams for Congress)

**Respondent:** Lucas Robinson, Hamilton County Republican Chair [REDACTED]

**Charge:** Mr. Robinson used his position as the Elected Hamilton County Republican Chair to discriminate against Mr. Williams causing an unreasonable disadvantage to be imposed in the Texas Republican Primary 2024 process for CD-31-TX. Mr. Robinson intentionally interfered with an open and fair election process by using his position as County Chair, and elected official, to hinder Mr. Williams campaign. Mr. Robinson, failed to treat equally all candidates attending the Candidate Forum held in Hamilton TX (St. John's Lutheran Church) on February 5, 2024.

Two weeks prior to the forum, Mr. Robinson, after being made aware of the issue, refused to take reasonable steps to correct the matter. Mr. Williams believes he was intentionally excluded from participating in the forum because he has been the leading challenger of John Carter, the incumbent, in the 2020 and 2022 Texas Republican Primaries. Mr. Robinson's relationship with Mr. Carter may be a factor in the matter.

**Timeline provided by Plaintiff:**

On or about January 15, 2024, I discovered that I was locked out of my Face Book account. I regularly use Face Book to monitor notices of events from various organizations in the six counties that make up the 31<sup>st</sup> Congressional District of Texas. Most organization now rely more on Face Book than their websites to communicate with the public. I also regularly check the organization's websites to ensure nothing is missed.

On January 17 I created a "ghost" Face Book (FB) account, as I was still locked out of my original page, so I may monitor postings. As of this writing, February 6, I am still locked out of my original Face Book page.

January 20, that morning, I saw, on my ghost FB page, a Hamilton County Republican post from January 19<sup>th</sup> informing all that there would be a candidate forum on February 5, at St. John's Lutheran Church in Hamilton Texas (attached). I texted Mr. Robinson at 8:54am to inquire about details. Mr. Robinson informed me that the schedule was full and there would be no time for me to address the voters attending the event. He also informed me that four of my competitors will be taking the stage to address the voters. This text thread continued until 2:44pm that afternoon with no satisfactory result. (attached)



January 21, I attended a forum being sponsored by Linda Atkins (Bell County Republican Precinct Chair) in Temple Texas, three of my opponents were attending. I asked Mr. Garapati how he became aware of the Hamilton County event, and he replied by email. I asked Mr. Abel how he became aware of the Hamilton event he replied by Face Book.

January 22, I communicated with the Republican Party of Texas (RPT) via their contact tab on the RPT website about the ethics issue I was having with Mr. Robinson.

January 24, I followed up with RPT via a phone call, Abby Moore was the person I spoke with, and she advised she'll get back to me after she has a chance to review progress. I followed up with her that afternoon and she advised that they were trying to contact Mr. Robinson to hear his side of the story. In my complaint to RPT I offered a couple of satisfactory solutions, reduce each candidate's time and divide the time equally among those attending, or not allow any candidate in my race time on stage. Still no word from Mr. Robinson.

January 25, I followed up again with RPT in the morning and was put through to Jen Hall, she advised me she'd get back to me within an hour. There was no call back and as of 2:17pm, I filed a complaint with the Texas Ethics Commission (attached).

January 31, I received a Notice of Dismissal from the Texas Ethics Commission stating the matter was not within their jurisdiction (attached).

February 2, I reached out again to RPT via the contact tab on their website for mediation on this issue, hoping to avoid litigation, no response back.

February 3, I received an email from the Hamilton County Republican Party reminding all the Candidate forum is on Monday February 5<sup>th</sup>. All my opponents were listed as speaking along with Mike McClosky (surrogate for incumbent John Carter). My name does not appear as a candidate or speaker (attached).

February 5, I attended the Hamilton County Republican Party forum with Glen Cebulak, a friend who has served as my Security Team Leader, to be a witness. We arrived at 6:00pm. There were about a dozen people already there, Mr. Able, Mr. McClosky (John Carter's surrogate), and Mr. Robinson among them. I greeted several people who knew me from past campaigns.

Mr. Robinson approached me and said, "there's good news, Mr. Latimer is unable to attend so there's an empty seat on stage you can have, if you publicly apologize for filing a frivolous ethics complaint against me." To which I replied, "so you want me to apologize for you being obstinate." Mr. Robinson came right back with "if that's going to be your attitude you should leave." I answered, "I don't consider practicing progressive conflict resolution frivolous". Mr. Robinson replied, "if that's your attitude you should leave." I told Mr. Robinson, "Lucas this isn't



over." To which he replied, "I'm a Lawyer and I can handle it." I looked at Mr. Cebulak and asked, "you hear all that"? He replied, "every word".

Mr. Cebulak and I turned to leave, I said hello to a few more people on the way out, and as I passed Mr. Abel, I asked him if he had a minute so I could brief him on what was going on. I asked Mr. McClosky if he had a minute and he turned away.

We stepped out of the venue after spending less than ten minutes inside. I informed Mr. Abel of what had been going on and informed him he would be on a witness list to testify as to when and how he heard about this event. Mr. Abel said he'd be happy too. Mr. Abel, Cebulak and I spoke in the parking lot for several more minutes, when Mr. Cebulak and I left it was 6:30pm. There were now over fifty voters inside and Mr. Garapati has not yet arrived.

At 9:45pm Mr. Abel called me while he was driving home from the forum to share some of what transpired. He didn't recall Mr. Robinson using my name while addressing the audience but Mr. Abel felt an uneasy tension that appeared to be present in Mr. Robinson's and Mr. McClosky's demeanor. Mr. Abel said he had some video of the event that he planned to review the next morning and would share if something showed up that may be inappropriate or germane to my complaint. Mr. Abel advised that Mr. Garapati did attend the forum. I was glad that he and the other Mr. Robinson "approved" candidates were allowed to take the stage and address the voters present. The voters are entitled to as much information as can be gathered to make an informed choice at the ballot box.

The opportunity unreasonably denied me to address over fifty voters of Hamilton County on February 5 cannot be recreated. The harm Mr. Robinson has caused my campaign in his capacity as the elected Hamilton County Republican Chair cannot be undone with an apology. I've invested five years building relationships with voters in my district and approximately \$250,000.00 of my own money in my effort to represent the people of TX-31 in Washington DC.

**Damages sought:** \$250,000.00 actual damages, \$1,000,000.00 punitive damages, plus attorney's fees and Court costs, from Mr. Robinson and County as well as State Republican officials who may be culpable.

**Witnesses:**

Abhiram Garapati [REDACTED] — a candidate for CD-TX-31 can testify as to how and when he was made aware of the February 5 Hamilton County Forum, and a witness to the events, if any, at the February Hamilton County Forum.

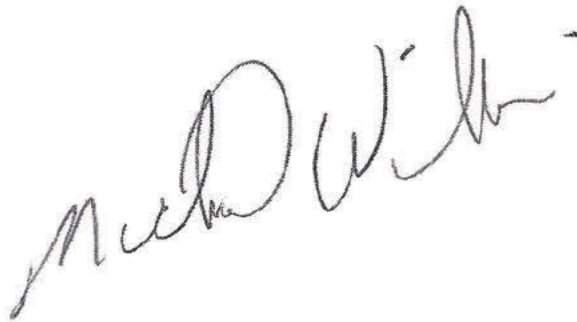
William Abel [REDACTED] — a candidate for CD-TX-31 can testify as to how and when he was made aware of the February 5 Hamilton County Forum, and a witness to the events, if any, at the February Hamilton County Forum.



Mack Latimer [REDACTED] – a candidate for CD-TX-31 can testify as to how and when he was made aware of the February 5 Hamilton County Forum.

Glen Cebulak [REDACTED] – a witness to the events at the February Hamilton County Forum.

Mike McClosky – surrogate for incumbent John Carter CD-TX-31 can testify as to how and when the Carter campaign was made aware of the February 5 Hamilton County Forum, and a witness to the events, if any, at the February Hamilton County Forum.

A handwritten signature in cursive script, appearing to read "Mack Latimer", written in dark ink.



From: Shane shane@kclw900am.com  
Subject: Fwd: FUBAR in Hamilton Cnty.  
Date: Feb 6, 2024 at 12:25:25 PM  
To: [REDACTED]

Encl. 7

Shane Curington, MS, BAS, AAS, AA

Begin forwarded message:

**From:** Mike Williams <mikewilliams31ctx@yahoo.com>  
**Date:** February 6, 2024 at 12:15:54 PM CST  
**To:** shane@kclw900am.com  
**Subject:** FUBAR in Hamilton Cnty.

Shane the summary and timeline are attached. This thing came to a head last night in Hamilton at a Hamilton County Republican candidate forum. Arch villain - Lucas Robinson elected chair of the Hamilton County Republicans. The Patriot yours truly.

Let's do the informed sources thing for now. I'm willing to be interviewed about the incident. This went to the attorneys this morning; they're preparing what to do next.

I believe you and Bill attended this event a couple of years ago when Carter even showed up.

**Mike Williams**

4-TX-31



EC Timeline.pdf

3.6 MB



# SWORN COMPLAINT BEFORE THE TEXAS ETHICS COMMISSION

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- A person filing a frivolous or bad faith complaint may be subject to a civil penalty.

**Please completely fill out this form.**

**Failure to complete this form properly will cause your complaint to be noncompliant and returned.**

## OFFICE USE ONLY

Docket Number

SC-32405397

Date Hand-delivered or Date Postmarked

Electronically Received  
05/17/2024  
Texas Ethics Commission

## I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mr.	Michael	
2 COMPLAINANT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #	CITY
	4106 Manzanita Dr.	Georgetown	TX
3 COMPLAINANT MAILING ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #	CITY
	(Full street or mailing address, including city, state, and zip code)		
4 COMPLAINANT CONTACT NUMBER (REQUIRED)	AREA CODE	CONTACT NUMBER	EXT
5 COMPLAINANT E-MAIL ADDRESS (REQUIRED IF KNOWN)	mikewilliams31ctx@yahoo.com		

## II. IDENTITY OF RESPONDENT

6 RESPONDENT NAME (REQUIRED)	MS / MRS / MR	FIRST	MI
	Mr.	Lucas	
7 RESPONDENT POSITION OR (REQUIRED)	NICKNAME	LAST	SUFFIX
		Robinson	
8 RESPONDENT PHYSICAL ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #	CITY
	413 E Hwy 36	Hamilton	Texas
9 RESPONDENT MAILING ADDRESS (REQUIRED)	ADDRESS	APT / SUITE #	CITY
	(Full street or mailing address, including city, state, and zip code)		
10 RESPONDENT CONTACT NUMBER (REQUIRED)	AREA CODE	CONTACT NUMBER	EXT
11 RESPONDENT E-MAIL ADDRESS (REQUIRED IF KNOWN) (if unknown, please state that)	hamiltontexasgop@gmail.com		



**III. NATURE OF ALLEGED VIOLATION****Page 2**

Include the specific law(s) or rule(s) alleged to have been violated. YOU MUST ALLEGE A VIOLATION OF A LAW THAT IS WITHIN THE COMMISSION'S JURISDICTION. 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 and 2004 of the Gov't Code; (3) § 334.025 and § 335.055 of the Local Gov't Code; (4) 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; and (5) § 2152.064 and § 2155.003 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 returned.*

I, Mike Williams, was a candidate for Texas CD-31 in the 2024 Republican Primary. I became aware of a Candidate Fair being hosted by the Hamilton County Republicans scheduled for February 5 via Facebook on the morning of January 20. I had been locked out of Facebook for about a week at that point, and set-up a ghost Facebook page so I may monitor events scheduled for the six counties of my district. I routinely check the websites and Facebook pages of my six counties at least twice a week to stay informed.

I texted Mr. Lucas Robinson (Hamilton County Republican Chair) that morning (January 20) at 8: 54am to inquire as to details of the Fair. Mr. Robison replied that it was the last scheduled regular meeting in Hamilton County before election day, and that the speaker list was full and there would be no time allotted for me to speak. He also stated that four of my opponents for TX-31 are on the list of speakers. I offered to have the time of each speaker reduced to afford each candidate present equal time or cut speaking time for candidates in my race altogether, none of these solutions were acceptable to Mr. Robinson. This text thread went on until 2:44pm that afternoon without a satisfactory resolution.

I saw three of my opponents at a Candidate Forum being hosted by some Bell County Republican Precinct Chairs in Temple on the evening of Sunday January 21. I inquired as to how they became aware of the Candidate Fair in Hamilton on February 5; some replied via email and some via Facebook. Mr. Robinson has my email address and phone number; I was not afforded the same level of due diligence from Mr. Robinson as my opponents.

I submit that Mr. Robinson's handling of this matter constitutes an illegal campaign contribution to all of my opponents as the County party failed to report it under Title 15 of the Texas Election Code. 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. SEE TEC Advisory Opinion No. 343. It is therefore "political advertising" on behalf of the other candidates under section 251.001(16) of the Election Code and must be reported. I assess the unreported value of the Candidate Fair as being \$6,000, based on my having hosted similar events in the 2022 primary election season.

**ATTACH ADDITIONAL PAGES AS NEEDED**



**IV. STATEMENT OF FACTS****Page 3**

You must 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 you, but alleged on information and belief. Use simple, concise, and direct statements. You must state facts that, if true, would constitute a violation of a law within the Commission's jurisdiction and allege facts to sufficiently indicate the manner and means by which each alleged violation occurred.

*Please completely fill out this form.*

*Failure to complete this form properly will cause your complaint to be noncompliant and returned.*

Mr. Robinson's action of excluding one candidate over another from the Fair qualifies as "political advertising" defined in TEC Advisory Opinion No. 343.

The action violates Federal campaign finance law: political party involvement in primary election, failing to report an in-kind contribution, and exceeding allowed contribution amount.

The action also violates SREC bylaws prohibiting party funds or resources being used in intraparty contests.

**ATTACH ADDITIONAL PAGES AS NEEDED**



**V. LISTING OF DOCUMENTS AND OTHER MATERIALS****Page 4**

You must 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. Relevant documents that are available to you or in your possession must be included.

*Please completely fill out this form.*

*Failure to complete this form properly will cause your complaint to be noncompliant and returned.*

NA

ATTACH ADDITIONAL PAGES AS NEEDED



**VI. AFFIDAVIT BASED ON PERSONAL KNOWLEDGE****Page 5**

(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 returned.*

I, Michael H Williams, 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. I declare under penalty of perjury that the foregoing is true and correct and that the information contained in this complaint is true and correct.

Michael H Williams

Signature of Complainant (Declarant)

**UNSWORN DECLARATION SECTION**

My name is Michael Howard Williams, and my date of birth is REDACTED.

My Address is 4106 Manzanita Dr, Georgetown, TX, 78628-1356, United States.

Executed in Williamson County, State of TX, on May 17, 2024.

Michael H Williams

Signature of Complainant (Declarant)



**VII. AFFIDAVIT BASED ON INFORMATION AND BELIEF****Page 6**

(Execute this affidavit if the acts alleged are not within your direct personal knowledge, but are based on reasonable belief.)

*Please completely fill out this form.*

*Failure to complete this form properly will cause your complaint to be noncompliant and returned.*

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 (state below):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Signature of Complainant (Declarant)

**UNSWORN DECLARATION SECTION**

My name is Michael Howard Williams, and my date of birth is REDACTED.

My Address is 4106 Manzanita Dr, Georgetown, TX, 78628-1356, United States.

Executed in Williamson County, State of TX, on May 17, 2024.

\_\_\_\_\_  
Signature of Complainant (Declarant)



# TEXAS ETHICS COMMISSION

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

Encl. 9

Randall H. Erben  
Chair

Chris Flood  
Vice Chair

J.R. Johnson  
Executive Director



Commissioners

Chad M. Craycraft  
Mary K. "Katie" Kennedy  
Patrick W. Mizell  
Richard S. Schmidt  
Joseph O. Slovacek  
Steven D. Wolens

May 23, 2024

Mr. Michael Williams

SENT BY EMAIL

**Re: Notice of Dismissal, SC-32405397**

Dear Mr. Williams:

We received your complaint on May 17, 2024. This complaint does not comply with the legal requirements for a complaint filed with the Texas Ethics Commission ("TEC").

The TEC must dismiss a complaint if it does not make an allegation that, if true, constitutes a violation of a law administered and enforced by the TEC. The TEC has jurisdiction to enforce Title 15 of the Election Code (Chapters 251-259), Chapters 302, 303, 305, 572, and 2004 of the Government Code, Sections 2152.064 and 2155.003 of the Government Code, Sections 334.025 and 335.055 of the Local Government Code, and Subchapter C, Chapter 159, of the Local Government Code.

The complaint you filed does not make an allegation that, if true, would constitute a violation of any law enforced by the TEC. Please note that the TEC primarily enforces laws related to campaign finance reports, political advertising disclosures, lobbying, and personal financial statement filings by state officers. Your complaint appears to allege that the respondent, as the Hamilton County Republican Party Chair, violated Ethics Advisory Opinion 343 (interpreting Section 255.003 and 251.001(16) of the Election Code) and the State Republican Executive Committee bylaws by excluding you from a candidate forum. The election at issue in your sworn complaint appears to be an election for the United States Congress, a federal election. Title 15 of the Election Code does not apply to candidates for an office of the federal government, and the TEC does not have jurisdiction over campaign activity in connection with federal elections. Tex. Elec. Code § 251.006. Therefore, your complaint does not identify a violation of any law enforced by the TEC.

For the reasons stated above, your complaint is dismissed and no further action will be taken. If you have any questions about the laws enforced by the TEC, then you may call our main number at (512) 463-5800 and ask to speak with an attorney.

Sincerely,

/s/ Samantha L. Vasquez

Samantha L. Vasquez  
Assistant General Counsel



Page 2

FINDING OF NO JURISDICTION:

*/s/ J.R. Johnson*

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J.R. Johnson  
Executive Director

SLV:mc

Enclosures: Complaint (original to complainant, copy to respondent)  
Rules Concerning Sworn Complaints

c: Mr. Lucas Robinson

**SENT BY EMAIL**