



August 7, 2023

Laura Prine  
*Via email: prineld@elpasotexas.gov*

Karla M. Nieman  
*Via email: niemankm@elpasotexas.gov*

Frank Garza  
*Via email: fgarza@dtrglaw.com*

*Re: Ethics Complaint filed on May 26, 2023*

Mrs. Prine, Mrs. Nieman, and Mr. Garza,

Pursuant to the City's Ethics Code 2.92.210, I submit this letter and attached newly discovered evidence. My client continues to maintain that there was no violation of any City Ethics Code. In fact, the "Determination of the Ethics Review Commission," dated July 24, 2023, presents Findings of Fact that fail to list a *single* fact; that is, there is no reference to any specific act that the Representative is alleged to have committed. Instead, there are only references to the *procedural* voting of the commission, the citations to the code, and a generalized observation. There is no finding of any specific fact substantiated by the record of the proceedings.

The probable reason for this involves the first exhibit, which shows that Chairperson Casey Williams violated Ethics Code 2.92.190(E)(1). In 2019, Williams filed an ethics complaint against the Representative. This unfounded complaint was eventually dismissed (*see* Exhibit 2). Yet, the sheer fact that Williams would file a meritless complaint against the Representative shows his partiality and bias. Even though being asked directly by the Representative, his failure to recuse himself is a violation of the ethics code and led to an improper rendition.

Exhibit 3 also shows that, once a prior card expired, the City issued a new Gas Card to the Representative. This shows that the *City* authorized the Representative to use the card.

Exhibit 4 is a report that compares similar gas card usages across the State of Texas. For example, Austin officials receive a \$5,400 allowance per year and Houston representatives receive \$4,200 per year. Therefore, the Representative's gas card usage was quantitatively not excessive.

For all of these reasons, I strongly urge you to reconsider your decision and dismiss the complaint.

I am happy to discuss this issue at your leisure and can be contacted at: [felix@valenzuela-law.com](mailto:felix@valenzuela-law.com) or 915-209-2719. Should you have any questions, please feel free to contact my office. I look forward to our conversation.

Warm regards,

A handwritten signature in black ink, consisting of a stylized 'F' followed by a long, sweeping curve that extends to the right.

Felix Valenzuela