

TEXAS ETHICS COMMISSION

IN THE MATTER OF
BRIAN MUECKE,
RESPONDENT

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BEFORE THE
TEXAS ETHICS COMMISSION
SC-32505243

NOTICE OF PRELIMINARY REVIEW HEARING

This serves as notice that the Texas Ethics Commission ("TEC") has set sworn complaint SC-32505243 for a preliminary review hearing in accordance with Section 571.125 of the Government Code on the following date at the following time and place:

Date of Hearing: December 10, 2025

Time of Hearing: 9:00 a.m.

Place of Hearing: State Capitol Extension
Austin, Texas 78701

The sworn complaint alleges that in connection with SaveSBISD, a political committee, the respondent: 1) failed to appoint a campaign treasurer for SaveSBISD, in violation of Section 252.001 of the Election Code; 2) accepted political contributions and made political expenditures at a time when no campaign treasurer appointment was in effect for SaveSBISD, in violation of Section 253.031 of the Election Code; 3) failed to file campaign finance reports for SaveSBISD, in violation of Sections 254.123, -.124, -.153, -.154 of the Election Code; and 4) failed to include political advertising disclosure statements on SaveSBISD's political advertising text messages and signs, in violation of Section 255.001 of the Election Code.

The respondent may appear at the hearing with the assistance of counsel and may present any relevant evidence. At the hearing, the TEC will determine whether there is credible evidence of the violations alleged. Under Section 571.140 of the Government Code, proceedings at a preliminary review hearing performed by the TEC are confidential. Therefore, as a non-party to the complaint, you will not be permitted to attend or testify at the hearing unless you are called as a fact witness.

Please contact me if you need any other information about this hearing.

TEXAS ETHICS COMMISSION

/s/ Jordan T. Hunn

BY:

Jordan T. Hunn
Deputy Director of Enforcement
Texas Ethics Commission
P. O. Box 12070
Austin, Texas 78711-2070
Telephone: (512) 463-5824

TEXAS ETHICS COMMISSION

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

Randall H. Erben
Chair

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Vice Chair

J.R. Johnson
Executive Director



Commissioners

Sean Gorman
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Geanie W. Morrison
Richard S. Schmidt
Joseph O. Slovacek
Mark Strama

June 2, 2025

Mr. Brian Muecke

Houston, Texas 77024

CERTIFIED MAIL NO. 9236 0901 9403 8317

RETURN RECEIPT REQUESTED
DELIVERY CONFIRMATION NO.

9114 9011 2308 6199

Re: Notice of Complaint, SC-32505243

Dear Mr. Muecke:

We received sworn complaint SC-32505243 on May 27, 2025. The sworn complaint alleges that in connection with SaveSBISD, a political committee, you: 1) failed to appoint a campaign treasurer for SaveSBISD, in violation of Section 252.001 of the Election Code; 2) accepted political contributions and made political expenditures at a time when no campaign treasurer appointment was in effect for SaveSBISD, in violation of Section 253.031 of the Election Code; 3) failed to file campaign finance reports for SaveSBISD, in violation of Sections 254.123, -.124, -.153, or -.154 of the Election Code;¹ and 4) failed to include political advertising disclosure statements on SaveSBISD's political advertising text messages and signs, in violation of Section 255.001 of the Election Code.

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

The sworn complaint includes an additional allegation over which the TEC cannot accept jurisdiction. In order to comply with the legal requirements for a sworn complaint, a complaint must state on its face an allegation that, if true, constitutes a violation of a law administered and enforced by the TEC. Tex. Gov't Code §§ 571.122(d), 571.124(f). A sworn complaint must also allege facts that provide sufficient detail to reasonably place the respondent on notice of the law violated and of the manner and means by which the violation allegedly occurred and to afford the respondent a basis on which to prepare a response. 1 Tex. Admin. Code § 12.14(a). The complaint alleges that you failed to maintain a record of all of SaveSBISD's reportable activity, in violation of Section 254.001. However, the sworn complaint does not allege any facts that would indicate

¹ A complaint that erroneously cites a specific rule or provision of law is nonetheless sufficient if the correct citation can reasonably be ascertained by the TEC. 1 Tex. Admin. Code § 12.13(b).

that you did not keep adequate records for SaveSBISD. Because it does not allege sufficient facts to state a violation, this allegation cannot be accepted.

The sworn complaint allegations will be processed as Category One violations. Under the law you are required to respond to the allegations not later than 10 business days from the date you receive this notice. Failure to respond will constitute a separate violation.

The response must be in writing, admit or deny the allegations, and be signed by you. If you deny the allegations, then you should provide evidence supporting the denial. The response must include any challenge you seek to raise to the TEC's exercise of jurisdiction. The response should be under oath. We have enclosed an affidavit form that you may wish to use for the response. A respondent who is a candidate or officeholder may by writing submitted to the TEC designate an agent with whom the TEC staff may communicate regarding the complaint. 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 allegations in the complaint.

To comply with the legal requirements regarding the initial notice of a sworn complaint, I have also included a copy of the sworn complaint, the TEC'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 TEC's website at www.ethics.state.tx.us.

Please note that at this stage in the process, TEC 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
Interim Director of Enforcement

Jurisdiction accepted over some allegations
For the Texas Ethics Commission

J.R. Johnson Digitally signed by J.R. Johnson
Date: 2025.06.02 12:01:22
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J.R. Johnson
Executive Director

JTH:mc