



FOR OFFICIAL USE ONLY

Case No.

22-001

City of Denton, Texas
Ethics Complaint Form (§2-279)
Updated: Jan. 2021

RECEIVED

MAY - 2 2022

ETHICS COMPLAINT FORM

Your Full Name

Scott Lewis Campbell

City Manager's / City
Secretary's Office

Your Address

1925 Georgetown Dr.

City

Denton

State

TX

Zip Code

76201

Telephone Number

940-535-8057

Email Address – redacted if the Complaint Form is publicized

Name of person accused of violating §§2-272 and/or 2-273 of the Ethics Ordinance. If you are complaining about more than one individual, a separate Complaint form must be completed for each. The Complaint form may be photocopied if needed.

Paul Meltzer

Name the position or title of the person accused of violating §§2-272 and/or 2-273 of the Ethics Ordinance.

City Council member

Please indicate which section(s) of the Ethics Ordinance you believe was violated.

☐ Sec. 2-272 (a) Duty to Report☐ Sec. 2-272 (b) Financial Disclosures☐ Sec. 2-272 (c) Business Disclosures☐ Sec. 2-273 (a) Conflicts of Interest☐ Sec. 2-273 (b) Gifts☐ Sec. 2-273 (c) Outside Employment☐ Sec. 2-273 (d) Representation of Others☐ Sec. 2-273 (e) Improper Influence☒ Sec. 2-273 (f) Misuse of Information☐ Sec. 2-273 (g) Abuse of Resources☐ Sec. 2-273 (h) Abuse of Position☐ Sec. 2-273 (i) Subsequent Work on Prior Projects

Provide a statement of facts constituting the alleged violation and the dates on which, or period of time in which, the alleged violation occurred. Only violation(s) listed under §§2-272 and/or 2-273 of the Ethics Ordinance will be considered for review. This statement does not constitute the required affidavit, which must be attached to this complaint.

See attached affidavit and copy
of flyer/mailer



Provide detailed evidentiary facts supporting your allegations. Attach additional sheets, if necessary.

See attached

By affixing your signature below, you are affirming that you (1) have read the complaint and know its contents and (2) believe the alleged violations to be true.

Scott Lewis Campbell

Your Full Name (Printed)

Scott L Campbell

Your Signature

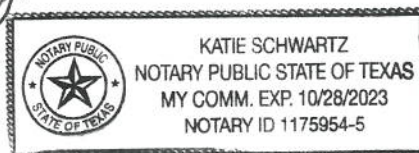
May 2, 2022

Date

Subscribed and sworn to before me, this 2 day of May

Notary Stamp and Seal

Katie Schwartz, a Notary Public in and for
Denton County, State of Texas.



Katie Schwartz

Notary Public

My commission expires: 10/28/2023

Official Use Only:

Date Received: 5/2/2022

Accepted By:

Madison Rorschach

Acceptance Date:

5/2/2022

Mail completed and notarized form to:

City Auditor
215 E. McKinney St.
Denton, Texas 76201

(940) 349-7228

InternalAudit@CityofDenton.com
www.cityofdenton.com

City of Denton Code of Ethics Violations
by Paul Meltzer, Denton City Council member, Place 6

Section 2-273 (e) Improper Influence. It shall be a violation of this article for a city official to use such person's official title/position to:

(1) Secure special privileges or benefits for such person or persons.

- Paul Meltzer, Denton City Council member, Place 6, used his position as a city council member to obtain the image and likeness of the Notary Seal of the City Secretary without permission or authority to secure a special privilege for himself by including the seal on campaign literature for which Meltzer paid, specifically a mailer that promoted his candidacy for Mayor and the candidacies of Brandon Chase McGee for Place 5 and Amber Briggie for Place 6 during the 2022 Denton City Council municipal election.
- Paul Meltzer, Denton City Council member, Place 6, used his position as a city council member to obtain the image and likeness of the Notary Seal of the City Secretary without permission or authority to secure a special privilege for Amber Briggie by including the seal on a campaign mailer for which Meltzer paid, specifically a mailer that promoted his candidacy for Mayor and the candidacies of Brandon Chase McGee for Place 5 and Amber Briggie for Place 6 during the 2022 Denton City Council municipal election.
- Paul Meltzer, Denton City Council member, Place 6, used his position as a city council member to obtain the image and likeness of the Notary Seal of the City Secretary without permission or authority to secure a special privilege for Brandon Chase McGee by including the seal on campaign literature for which Meltzer paid, specifically a mailer that promoted his candidacy for Mayor and the candidacies of Brandon Chase McGee for Place 5 and Amber Briggie for Place 6 during the 2022 Denton City Council municipal election.

(2) Grant any special consideration, treatment, or advantage to any citizen, individual, business organization, or group beyond that which is normally available to every other citizen, individual, business organization or group.

- Paul Meltzer, Denton City Council member, Place 6, used his position as a city council member to obtain the image and likeness of the Notary Seal of the City Secretary without permission or authority to secure a special privilege to himself by including the seal on campaign literature for which Meltzer paid, specifically a mailer that promoted his own candidacy and the candidacies of Brandon Chase McGee and Amber Briggie during the 2022 Denton City Council municipal election. Use of the Notary Seal of the City Secretary without permission and authority granted special consideration, treatment and/or advantage to Paul Meltzer.

Code of Ethics violations by Denton City Council member Paul Meltzer, cont'd

- Paul Meltzer, Denton City Council member, Place 6, used his position as a city council member to obtain the image and likeness of the Notary Seal of the City Secretary without permission or authority to secure a special privilege to Brandon Chase McGee by including the seal on campaign literature for which Meltzer paid, specifically a mailer that promoted his own candidacy for Mayor and the candidacies of Brandon Chase McGee for Place 5 and Amber Briggie for Place 6 during the 2022 Denton City Council municipal election. Use of the Notary Seal of the City Secretary without permission and authority granted special consideration, treatment and/or advantage to Brandon Chase McGee.
 - Paul Meltzer, Denton City Council member, Place 6, used his position as a city council member to obtain the image and likeness of the Notary Seal of the City Secretary without permission or authority to secure a special privilege to Amber Briggie by including the seal on campaign literature for which Meltzer paid, specifically a mailer that promoted his own candidacy for Mayor and the candidacies of Brandon Chase McGee for Place 5 and Amber Briggie for Place 6 during the 2022 Denton City Council municipal election. Use of the Notary Seal of the City Secretary without permission and authority granted special consideration, treatment or advantage to Amber Briggie.
- (3) Assert the prestige of the official's or city position for the purpose of advancing or harming private interests.
- Paul Meltzer, Denton City Council member, Place 6, asserted the prestige of his office to obtain the Notary Seal of the City Secretary without permission or authority to advance his own private interests as candidate for Mayor of the City of Denton while harming the private interests of his opponent by using the City Secretary's Notary Seal on campaign literature for which Meltzer paid, specifically a mailer that promoted his own candidacy for Mayor and candidacies of Brandon Chase McGee for Place 5 and Amber Briggie for Place 6 during the 2022 Denton City Council municipal election.
 - Paul Meltzer, Denton City Council member, Place 6, asserted the prestige of his office to obtain the Notary Seal of the City Secretary without permission or authority to advance the private interests of Brandon Chase McGee as a candidate for Denton City Council, Place 5, while harming the private interests of McGee's opponent by using the City Secretary's Notary Seal on campaign literature for which Meltzer paid, specifically a mailer that promoted his own candidacy for Mayor and candidacies of Brandon Chase McGee for Place 5 and Amber Briggie for Place 6 during the 2022 Denton City Council municipal election.

Code of Ethics violations by Denton City Council member Paul Meltzer, cont'd

- Paul Meltzer, Denton City Council member, Place 6, asserted the prestige of his office to obtain the Notary Seal of the City Secretary without permission or authority to advance the private interests of Amber Briggie as a candidate for Denton City Council, Place 6, of Denton while harming the private interests of her opponent by using the City Secretary's Notary Seal on campaign literature for which Meltzer paid, specifically a mailer that promoted his own candidacy for Mayor and candidacies of Brandon Chase McGee for Place 5 and Amber Briggie for Place 6 during the 2022 Denton City Council municipal election.

Section 2-273 (g) It shall be a violation of this article for a city official to use, request, or permit the use of city facilities, personnel, equipment, software, supplies or staff time for private purposes (including political purposes), except to the extent and according to the terms that those resources are generally available to other citizens and the city officials for official city purposes.

- Paul Meltzer, Denton City Council member, Place 6, used the Notary Seal of the City Secretary, for which the City of Denton pays, without permission or authority for a private political purpose.
- Paul Meltzer, Denton City Council member, Place 6, used the Notary Seal of the City Secretary, for which the City of Denton pays, without permission or authority on private political campaign literature. No one has permission to use the Notary Seal of the City Secretary of the City of Denton except the City of Denton City Secretary.

✓ Let's Elect the Denton Forward Team

Vote

Paul Meltzer

A Plan to Make
Denton Better,
Not Just Bigger

- ✓ Create a more livable, vibrant and accessible Denton
- ✓ Build new affordable workforce housing
- ✓ Hire more first responders to keep our communities safe
- ✓ Preserve our clean air, water and parkland

Learn more about
Paul Meltzer's plan at
MeltzerForMayor.com.



There's a reason real
estate special interests
are bankrolling

**GERARD
HUDSPETH.**

• **X** Has taken **tens of thousands of dollars in campaign contributions** from real estate special interests and big developers¹

X Championed a massive development that will **destroy 25% of the environmentally sensitive area** on Pilot Knob²

X Has **relied on Greg Abbott's political infrastructure** to push their shared agenda in Denton³



**Out-of-town donors
dominate latest
contributions**
Denton Record-Chronicle
October 28, 2020

Check the facts:

1. Gerard Hudspeth Campaign Finance Reports
2. Denton Record-Chronicle, 6/30/2021
3. Transparency USA, 10/1/2021

Early Voting April 25-May 3 ✓ Election Day May 7