

Revised 01/05/2006

**SWORN COMPLAINT
BEFORE
THE TEXAS ETHICS COMMISSION**

Office Use Only
Docket Number

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I. IDENTITY OF COMPLAINANT

I, Mike Donnelly, complainant,
(full name of individual filing the complaint)

hereby file this sworn complaint with the Texas Ethics Commission. My address is
27 Rolling Stone Place, The Woodlands, TX 77381
(full mailing or street address, including P.O. box number or street, city, state, and zip code)

My telephone number is 713-851-3706
(telephone number, including area code)

II. IDENTITY OF RESPONDENT

The respondent is W. Robert Eissler
(full name of respondent)

The respondent holds the position or title of State Representative
(position or title held by respondent)
District 15

The respondent's address is 26214 Oak Ridge Dr.
(full mailing or street address, including P.O. box number or street, city, state, and zip code of respondent)
The Woodlands, TX 77380

The respondent's telephone number is 936-321-2303
(telephone number of respondent, including area code)

Attach additional pages, if necessary.

Revised 01/05/2000

III. NATURE OF ALLEGED VIOLATION

(Include the specific law or rule alleged to have been violated, if possible. The Texas Ethics Commission has jurisdiction to enforce *only* Chapters 302, 305, and 572 of the Government Code and Title 15 of the Election Code.)

1) Officeholder made payments from political contributions to purchase real property or to pay the interest on or principal of a note for the purchase of real property, in violation of Section 253.038.

2) Officeholder made payments from political contributions for personal services rendered by the officeholder to "Eissler & Associates", in which the officeholder has a participating interest of more than 10 percent, in violation of Section 253.041(a)(1).

3) Officeholder made payments from political contributions to his spouse, Linda Eissler, in violation of Section 253.041(a)(2).

4) Officeholder accepted political contributions and converted the contribution to personal use of an asset, in violation of Section 253.035(c).

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Attach additional pages, if necessary.

Revised 01/03/2006

III. NATURE OF ALLEGED VIOLATION

(Include the specific law or rule alleged to have been violated, if possible. The Texas Ethics Commission has jurisdiction to enforce *only* Chapters 302, 305, and 572 of the Government Code and Title 15 of the Election Code.)

Campaign Finance Report 06/30/05

01/01/05	Linda Eissler	\$2000.00,	01/15/05	Linda Eissler	\$2000.00
02/01/05	Linda Eissler	\$2000.00,	02/15/05	Linda Eissler	\$2000.00
02/15/05	Linda Eissler	\$1000.00,	03/01/05	Linda Eissler	\$2000.00
03/08/05	Linda Eissler	\$1050.00,	03/15/05	Linda Eissler	\$2000.00
04/01/05	Linda Eissler	\$2000.00,	04/10/05	Linda Eissler	\$1000.00
04/15/05	Linda Eissler	\$2000.00,	05/01/05	Linda Eissler	\$2000.00
05/15/05	Linda Eissler	\$2000.00,	06/01/05	Linda Eissler	\$1000.00
06/30/05	Linda Eissler	\$1000.00,	06/30/05	Linda Eissler	\$1050.00

Campaign Finance Report 12/31/05

12/23/05	Eissler & Associates	\$200.00,			
12/23/05	Eissler & Associates	\$2200.00			
09/30/05	Linda Eissler	\$3000.00			
10/15/05	Linda Eissler	\$2500.00			
11/15/05	Linda Eissler	\$2500.00			
12/15/05	Linda Eissler	\$3000.00			
12/16/05	Linda Eissler	\$2500.00			
08/12/05	Fox Service	\$ 137.00			

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Attach additional pages, if necessary.

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Campaign Finance Report 12/31/05 Continued

08/12/05 Hyde Park Condo \$282.00, 08/12/05 Hyde Park Condo \$282.00

Campaign Finance Report 06/30/06

01/15/06 Linda Eissler \$1000.00, 02/15/06 Linda Eissler \$1000.00

03/07/06 Linda Eissler \$1500.00, 03/07/06 Linda Eissler \$1000.00

04/13/06 Linda Eissler \$1000.00, 05/15/06 Linda Eissler \$1000.00

06/15/06 Linda Eissler \$1000.00, 06/29/06 Linda Eissler \$1500.00

03/28/06 Eissler & Associates \$1050.00

03/28/06 Eissler & Associates \$ 500.00

06/29/06 Eissler & Associates \$ 500.00

06/29/06 Eissler & Associates \$1050.00

01/31/06 Hyde Park Condo \$ 282.00

04/28/06 Hyde Park Condo \$ 282.00

Attach additional pages, if necessary.

IV. STATEMENT OF FACTS

(State the facts constituting the alleged violation, including the dates on which or the period of time in which the alleged violation occurred. Identify allegations of fact not personally known to the complainant but alleged on information and belief. Please use simple, concise, and direct statements.)

Evidence contained in Campaign Finance Reports show that Mr. Eissler paid his wife for rent on an Austin Condominium which Mr. Eissler claims his wife owns. However, Travis County Property Tax Records show only W. Robert Eissler as the owner of the Hyde Park Condominium. According to newspaper articles, Mr. Eissler's two sons used the condominiums while attending the University of Texas. In addition, Mr. Eissler has transferred substantial campaign money to not only his company Eissler & Associates but also his wife Linda Eissler.

Attach additional pages, if necessary.

VI. AFFIDAVIT
BASED ON PERSONAL KNOWLEDGE
(Execute this affidavit if the acts alleged are within your direct personal knowledge.)

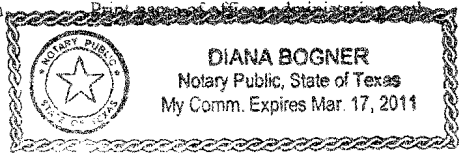
I, Michael J. Donnelly, complainant,
swear that I have knowledge of the facts alleged in this complaint
and that the information contained in this complaint is true
and correct.

[Signature]
Signature of complainant

AFFIX NOTARY STAMP SEAL ABOVE

Sworn to and subscribed before me, by the said Michael J. Donnelly, this
the 30 day of August, 20 07, to certify which, witness my hand and seal of office.

[Signature] Diana Bogner Notary Public
Signature of officer administering oath Print name of officer administering oath Title of officer administering oath



VII. AFFIDAVIT
BASED ON INFORMATION AND BELIEF
(Execute this affidavit if the acts alleged are not within your
direct personal knowledge, but are based on reasonable belief.)

I, Michael J. Donnelly, complainant,
swear that I have reason to believe and do believe that the violation alleged in
this complaint has occurred. The source and basis of my information and belief
is Campaign Finance Reports and Travis
County Property Tax Records.

[Signature]
Signature of complainant

AFFIX NOTARY STAMP / SEAL ABOVE

Sworn to and subscribed before me, by the said Michael J. Donnelly, this
the 30 day of August, 20 07, to certify which, witness my hand and seal of office.

[Signature] Diana Bogner Notary Public
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