

TEXAS ETHICS COMMISSION

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



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July 29, 2009

Mr. Bruce C. Tough
51 Rolling Stone Place
The Woodlands, Texas 77381-6528

**CERTIFIED MAIL NO. 7007 1490 0004 9890 5793,
RETURN RECEIPT REQUESTED**

Re: Notice of Complaint, SC-2907185

Dear Mr. Tough:

We received sworn complaint SC-2907185 on July 22, 2009. The complaint meets the technical form requirements for a complaint filed with the Texas Ethics Commission, and the executive director has determined that the Ethics Commission has jurisdiction over the violations of law alleged in the sworn complaint. The complaint alleges that you failed to properly disclose political contributions and loans in violation of section 254.031 of the Election Code and failed to include the office held on campaign finance reports in violation of section 254.091 of the Election Code.

With this notice, I have included a copy of the sworn complaint, the Ethics Commission'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 Ethics Commission's website at www.ethics.state.tx.us.

If you have any information relevant to the complaint, please provide it at this time. Your response must be in writing and under oath. We have enclosed an affidavit form that you may wish to use for your response. Your response must include any challenge you seek to raise to the Ethics Commission's jurisdiction. In addition, in your response you may acknowledge the occurrence or commission of the violation, or deny the allegations and provide evidence supporting that denial.

The sworn complaint allegations will be processed as Category One violations. You are required to respond to an allegation of a Category One violation not later than 10 business days from the date you receive this notice. **Failure to respond will constitute a separate violation for which a separate civil penalty may be assessed.**

Come visit our home page at <http://www.ethics.state.tx.us> on the Internet.

(512) 463-5800 • 1-800-325-8506 • FAX (512) 463-5777 • TDD 1-800-735-2989

The Texas Ethics Commission does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or the provision of services.

The law requires the commission to send this sworn complaint notice by registered or certified mail, return receipt requested. Future notices and correspondence will be sent by regular mail, unless the commission is notified otherwise.

Please note that at this stage in the process, Ethics Commission members and staff are required by law to keep the complaint and all documents relating to it strictly confidential. However, other persons, including the complainant and respondent named in the complaint, are not bound by this confidentiality requirement.


Please call me if you have any questions.

Sincerely,



Robert Mannas
Assistant General Counsel

Jurisdiction accepted
For the Texas Ethics Commission



David A. Reisman
Executive Director

RM:mc

Enclosures: Copy of Sworn Complaint
Statutes and Rules Concerning Sworn Complaints
Statement of Respondent's Rights
Affidavit

c: Mr. Joe Merrill
123 E. Mistybreeze Circle
The Woodlands, Texas 77381-3067

**CERTIFIED MAIL NO. 7007 1490 0004 9890 5809,
RETURN RECEIPT REQUESTED**