

# TEXAS ETHICS COMMISSION

The Texas Ethics Commission is authorized by the Government Code, §571.091, to issue advisory opinions in regard to the following statutes: the Government Code, Chapter 302; the Government Code, Chapter 305; the Government Code, Chapter 572; the Election Code, Title 15; the Penal Code, Chapter 36; and the Penal Code, Chapter 39. Requests for copies of the full text of opinions or questions on particular submissions should be addressed to the Office of the Texas Ethics Commission, P.O. Box 12070, Austin, Texas 78711-2070, (512) 463-5800.

## Ethics Advisory Opinion

EAO-631: Whether members of the State Employee Charitable Campaign Policy Committee are appointed officers required to file a Personal Financial Statement? (AOR-731).

### SUMMARY

The State Employee Charitable Campaign Policy Committee is a voluntary committee comprised of state employees who do not exercise authority and do not have discretion to exercise government functions and are not required to file a Personal Financial Statement.

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Questions on particular submissions should be addressed to the Texas Ethics Commission, P.O. Box 12070, Capitol Station, Austin, Texas 78711-2070, (512) 463-5800.

Issued in Austin, Texas, on December 10, 2025.

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Amanda Arriaga  
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Texas Ethics Commission  
Filed: December 11, 2025



EAO-632: Whether a current State Board of Education (SBOE) member can provide continuing professional development to educators in return for compensation during their SBOE service. (AOR-734).

### SUMMARY

Public servants may accept an honorarium for performing services if the public servant's official status was not a deciding factor in the decision to request the public servant to perform those services.

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EAO-633: Whether the TEC has authority to assess a civil penalty for a late personal financial statement filed by a director of the Harris County-Houston Sports Authority. (AOR-735).

### SUMMARY

An HCHSA director must file a PFS with the Texas Ethics Commission and is subject to a civil penalty imposed by the TEC for an untimely filed PFS as if the director were a state officer.

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EAO-634: Whether an officeholder may use political contributions to pay for the purchase or rental of business or formal attire typically associated with official duties. (AOR-736).

### SUMMARY

An officeholder may not use political contributions to buy or rent clothing that is adaptable to ordinary use, including business attire. However, an officeholder may purchase or rent clothing for officeholder activities if: 1) the clothing is of a type appropriate for the performance of duties or activities of the office held, 2) the clothing is not adaptable to general usage as ordinary clothing, and 3) the clothing is not so worn.

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EAO-635: Whether a former state employee may accept a job with a company when he participated in a procurement involving that same company during his state service without violating Section 572.069 of the Government Code if he recuses himself from state projects. (AOR-737).

#### SUMMARY

The requestor may not accept employment from the company at issue before the second anniversary of the date the contract was signed or the procurement is terminated or withdrawn.

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Texas Ethics Commission

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EAO-636: Whether a public servant may accept admission to the Microsoft Most Valuable Professionals Program. (AOR-738).

#### SUMMARY

Public servants may accept an honorarium for performing services if the public servant's official status was not a deciding factor in the decision to request the public servant to perform those services.

The Texas Ethics Commission is authorized by section 571.091 of the Government Code to issue advisory opinions in regard to the following statutes: (1) Chapter 572, Government Code; (2) Chapter 302, Government Code; (3) Chapter 303, Government Code; (4) Chapter 305, Government Code; (5) Chapter 2004, Government Code; (6) Title 15, Election Code; (7) Chapter 159, Local Government Code; (8) Chapter 36, Penal Code; (9) Chapter 39, Penal Code; (10) Section 2152.064, Government Code; and (11) Section 2155.003, Government Code.

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EAO-637: Whether representing a party before the State Office of Administrative Hearings (SOAH) in a contested matter against a state agency of previous employment constitutes an appearance before that state agency for the purposes of Texas Government Code § 572.054(a). (AOR-739).

#### SUMMARY

A former commissioner may not argue a contested matter referred by the TCEQ to SOAH because the final decision maker in the matter is the TCEQ.

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