



# City of San Antonio

Office of the  
City Clerk

## Sworn Complaint of Ethics Violations

Please fill this form out online and print it using the **Print** button provided.  
This form must be notarized.

For use of this form, see Section 2-83 of the City Ethics Code.

Any person, including a member of the Ethics Review Board or its staff, acting personally or on behalf of the Board, who believes that there has been a violation of the ethics laws may file a sworn complaint with the Office of the City Clerk.

Complaint submitted by:

\*First: Justin M.I.: P \*Last: Nichols Suffix: \_\_\_\_\_

\*Address: 115 E. Travis St., Ste. 1740

\*City: San Antonio \*State: TX \*Zip Code: 78205

\*Phone: (210) 354-2300 Alternate phone number: \_\_\_\_\_

Identify the person or persons who allegedly committed the violation:

*Full Name	Title or Position	Department	Add
IVY TAYLOR	MAYOR		Delete

\*Provide a statement of the facts on which the complaint is based, including the dates on which or period of time in which the alleged violation occurred:

Ivy Taylor was elected to the San Antonio City Council in 2009, and was appointed mayor to fill a vacancy in 2014. Taylor is a "city official" as defined by the San Antonio Ethics Code (the "Code"), and is required to file annual financial disclosures pursuant to Division 7, Sec. 2-73(a)(1) of the Code, with each report being due on March 31st of each year.

Taylor recently admitted she failed to report income earned by her and/or her spouse through an entity known as Marshall Bail Bonds. Taylor's spouse, Rodney Taylor, is the licensed bail bondsman under which Marshall Bail Bonds operates. Upon information and belief, Taylor's spouse holds an economic interest in Marshall Bail Bonds, and/or owns, manages, and/or operates Marshall Bail Bonds, and/or receives an annual income from the same in an amount exceeding \$5,000.

Taylor, without excuse, and having actual or constructive knowledge of the source of income, has failed to disclose the information required by Division 7, Sec. 2-74 (c),(d), and/or (i) of the Code by March 31, 2010, 2011, 2012, 2013, 2014, and 2015, each constituting an individual violation of the Code.

RECEIVED  
CITY OF SAN ANTONIO  
CITY CLERK  
2015 MAY -6 PM 12:38



**City of San Antonio**  
**Sworn Complaint of Ethics Violations**

**Office of the  
City Clerk**

**\*Describe the nature of the alleged violation, including if possible, the rule or rules allegedly violated:**

Taylor failed to disclose the name of any entity in which she or her spouse holds an economic interest in violation of Division 7, Sec. 2-74(c) of the Code, specifically, that of Marshall Bail Bonds; and/or

Taylor failed to disclose the name of any entity which she or her spouse owns, operates, and/or manages in violation of Division 7, Sec. 2-74(d) of the Code, specifically that of Marshall Bail Bonds; and/or

Taylor failed to disclose the source of income in excess of \$5,000 made by her or her spouse which was not otherwise disclosed in violation of Division 7, Sec. 2-74(i) of the Code, specifically that of Marshall Bail Bonds.

**\*Describe all documents or other materials that are relevant to the allegation:**

All annual financial disclosures reports made by Taylor are on file with the city clerk.

All documents related to Marshall Bail Bonds and/or Rodney Taylor which pertain to Taylor's interest and income related thereto.

**\*Describe all documents or other material that are relevant to the allegation but that are not in your possession, including the location of the document or materials if known:**

Upon information and belief, Rodney Taylor, has documents in his possession related to this complaint. He may be reached at 708 N. New Braunfels Ave., San Antonio, Texas 78202, (210) 229-1222.

The Bexar County Bail Bonds Board may also have documentation relating to this complaint.

The San Antonio City Clerk's office may also have documentation relating to this complaint.

When completed, use the **Print** button to print the form. The form must be notarized before it is submitted.  
All relevant documentation should be included when submitting the form.

RECEIVED  
CITY OF SAN ANTONIO  
CITY CLERK  
2015 MAY -6 PM 12:39



**City of San Antonio**  
**Sworn Complaint of Ethics Violations**

**Office of the  
City Clerk**

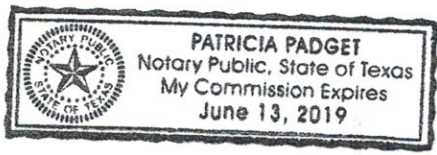
**Oath**

I swear or affirm that the statements contained in this "Sworn Complaint of Ethics Violations" form, including any accompanying documentation, to the best of my knowledge and belief are true, correct and complete. I also understand that a complaint filed in good faith is qualifiedly privileged. A person who knowingly makes a false statement in a complaint, or in proceedings before the Ethics Review Board, is subject to criminal prosecution for perjury or civil liability for the tort of abuse of process.

*[Handwritten Signature]*  
\_\_\_\_\_  
Signature of Individual Completing Complaint

Sworn to and subscribed before me by JUSTIN P. NICHOLS  
Printed Name of Individual Completing Complaint

On this 6<sup>th</sup> day of May, 2015, to certify which, witness my hand and seal.



Seal of Notary Public

*[Handwritten Signature]*  
\_\_\_\_\_  
Signature of Notary Public

Return completed form, along with all relevant documentation, to:

**Office of the City Clerk**  
Mailing Address:  
P.O. Box 839966  
San Antonio, Texas 78283-3966

Physical Address:  
City Hall  
100 Military Plaza, 2<sup>nd</sup> Floor  
San Antonio, Texas 78205

RECEIVED  
CITY OF SAN ANTONIO  
CITY CLERK  
2015 MAY -6 PM 12:39