



City of Austin  
**Ethics Review Commission**

**LETTER OF REPRIMAND**

**TO:** Unconventional Austin SPAC through its representative and attorney of record, Fred Lewis

**FROM:** City of Austin Ethics Review Commission

**DATE:** February 26, 2020

**RE:** Determination of Sanctions under City Code, Sections 2-7-47 and 2-7-48

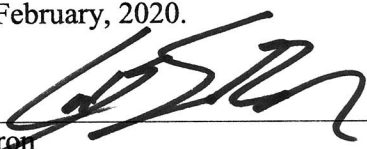
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In accordance with Chapter 2-7 of the Austin City Code, this letter is to advise you that the City of Austin Ethics Review Commission (the "Commission") has completed its consideration of the three campaign finance complaints filed on November 13, 2019 against Unconventional Austin SPAC. The complaints allege that Unconventional Austin SPAC violated City Code Section 2-2-33 (Disclosure Statement Required) of Chapter 2-2 (Campaign Finance) by failing to include a disclosure statement with the names of its five largest contributors in two political advertisements published in the Austin Chronicle on October 18, 2019 and October 25, 2019 and in a separate direct mail communication made on or about October 30, 2019.

Based on admissions of the Respondent during the preliminary hearing on the above-described complaints, the Commission determined that Unconventional Austin SPAC violated Section 2-2-33 and that the appropriate sanction is this letter of reprimand. City Code Section 2-7-48(C)(3) states in part: "A reprimand is the appropriate sanction when the commission finds that a violation has been committed intentionally or through disregard of this chapter." City Code Section 2-7-49 (Campaign Violations) provides that the Commission may draft and publish a letter of reprimand, among other sanctions, and shall apply the criteria in Section 2-7-48 to determine the appropriate sanction to impose for a violation of Chapter 2-2 (Campaign Finance). City Code Section 2-2-33 addresses the requirements for disclosure of the five largest contributors in certain political advertisements, electioneering communications, or express advocacy.

Based on the admissions of the representative of Respondent, Unconventional Austin SPAC, during the preliminary hearing and the Commission's above-described determinations, the Commission issues this letter of reprimand to Unconventional Austin SPAC as the appropriate sanction for violation of City Code Section 2-2-33.

This action is effective as of the 12th day of February, 2020.

  
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Luis Soberon  
Vice-Chair and Preliminary Hearing Presiding Officer  
Ethics Review Commission