



FOR OFFICIAL USE ONLY

Case No. Example-01City of Denton, Texas  
Ethics Complaint Form (§2-279)  
Updated: Jan. 2021

## ETHICS COMPLAINT FORM

Your Full Name

Kate Smith

Your Address

215 E. McKinney St.

City

Denton

State

TX

Zip Code

76201

Telephone Number

(940) 344-8119

Email Address – redacted if the Complaint Form is publicized

Kate.Smith@email.com

Name of person accused of violating §§2-272 and/or 2-273 of the Ethics Ordinance. If you are complaining about more than one individual, a separate Complaint form must be completed for each. The Complaint form may be photocopied if needed.

John R. Matthews

Name the position or title of the person accused of violating §§2-272 and/or 2-273 of the Ethics Ordinance.

Zoning Board of Adjustment

Please indicate which section(s) of the Ethics Ordinance you believe was violated.

☐ Sec. 2-272 (a) Duty to Report☐ Sec. 2-272 (b) Financial Disclosures☐ Sec. 2-272 (c) Business Disclosures☐ Sec. 2-273 (a) Conflicts of Interest☐ Sec. 2-273 (b) Gifts☒ Sec. 2-273 (c) Outside Employment☐ Sec. 2-273 (d) Representation of Others☒ Sec. 2-273 (e) Improper Influence☐ Sec. 2-273 (f) Misuse of Information☐ Sec. 2-273 (g) Abuse of Resources☐ Sec. 2-273 (h) Abuse of Position☐ Sec. 2-273 (i) Subsequent Work on Prior Projects

Provide a statement of facts constituting the alleged violation and the dates on which, or period of time in which, the alleged violation occurred. Only violation(s) listed under §§2-272 and/or 2-273 of the Ethics Ordinance will be considered for review. This statement does not constitute the required affidavit, which must be attached to this complaint.

From October 15, 2025, through January 10, 2026, John Matthews accepted paid consulting work with Lakeside Properties, LLC – a ~~local~~ local real estate firm that regularly seeks zoning variances from the City of Denton. On January 26, John voted ~~for~~ a Lakeside Properties zoning Variance request that he provided consulting services for.



Provide detailed evidentiary facts supporting your allegations. Attach additional sheets, if necessary.

- John can be seen voting on item C during the Jan. 26, 2026 meeting which was submitted by Lakeside properties: <https://www.video.com>
- Payment records from Lakeside show consulting fees paid to John in Dec. 2025 & Jan. 2026. for \$10,000.
- Lakeside's variance request includes language recommended by John in the ~~attach~~ attached consulting report.

By affixing your signature below, you are affirming that you (1) have read the complaint and know its contents and (2) believe the alleged violations to be true.

Kate Smith

Your Full Name (Printed)

X

Your Signature

1/29/26

Date

Subscribed and sworn to before me, this \_\_\_\_\_ day of \_\_\_\_\_,

Notary Stamp and Seal

\_\_\_\_\_, a Notary Public in and for \_\_\_\_\_

\_\_\_\_\_, County, State of \_\_\_\_\_.

Notary Public

My commission expires: \_\_\_\_\_

Official Use Only:

Date Received: 2/2/26

Accepted By:

*[Signature]*

Acceptance Date: 2/3/26

Mail completed and notarized form to:

City Auditor  
215 E. McKinney St.  
Denton, Texas 76201

(940) 349-7228

[InternalAudit@CityofDenton.com](mailto:InternalAudit@CityofDenton.com)  
[www.cityofdenton.com](http://www.cityofdenton.com)