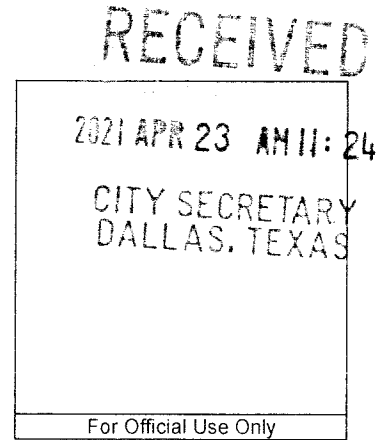




CITY OF DALLAS  
ETHICS ADVISORY COMMISSION

COMPLAINT FORM



Please type or print legibly in blue or black ink.

**NOTE: FILING A COMPLAINT THAT FALSELY ACCUSES SOMEONE OF A VIOLATION OF THE ETHICS CODE MAY RESULT IN CRIMINAL PROSECUTION OR SANCTIONS OF ANYONE WHO KNOWINGLY MAKES A FALSE ACCUSATION.**

**PART A – COMPLAINANT INFORMATION**

1. Your full name (identifies you as the Complainant):

Barry Jacobs

2. Your residence address (Street, City, State, and Zip Code):

[REDACTED]

3. Your business address (Street, City, State, and Zip Code):

4. Preferred telephone number:

(817) 504-0847

Cell    Home    Business (circle one)

5. Alternate telephone number:

(214) 823-9522

Cell    Home    Business (circle one)

6. Email address:

barryjacobs@hotmail.com

**PART B – COMPLAINANT DECLARATION**

I HAVE A COMPLAINT AGAINST:

1. Full name of person against whom you are bringing the allegation(s):

Eric Lynn Johnson

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2. Check the box that applies to the person named above and fill in the applicable information:

- Elected official Mayor (office held)
- Appointed official \_\_\_\_\_ (board/commission name)  
\_\_\_\_\_ (title/position held)
- Candidate \_\_\_\_\_ (office sought)
- City Employee \_\_\_\_\_ (title/position held)  
\_\_\_\_\_ (department)

3. Residence address (Street, City, State, and Zip Code) (If known):

\_\_\_\_\_

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4. Business address (Street, City, State, and Zip Code) (if known):

1500 Marilla St #5en, Dallas, TX 75201

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5. Telephone number (if known):

2146703301

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6. Email address (if known):

eric.johnson@dallascityhall.com

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**PART C – DESCRIPTION OF COMPLAINT**

Provide a statement of the facts upon which your complaint is based. Describe the events in the order in which they occurred. Keep dates of events in sequence. Include full names, addresses, and phone numbers of all individuals involved, including any witnesses present when the alleged violations took place. Be factual; the information you provide in this statement must be based on facts and not on personal conjecture. Try to answer the questions “who,” “what,” “where,” and “when.” Attach extra sheets if more space is needed.

Please see Attachment I hereto.

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**PART D – CODE VIOLATIONS**

List the specific sections and paragraphs of the Code of Ethics provisions you believe have been violated. A copy of the Code of Ethics can be found on the city secretary’s website.

Section 12A-10(a) - use of city official's title in a political endorsement. The Parish Post  

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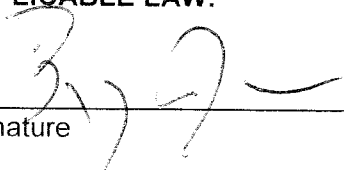
and the Johnson Post constitute political endorsements and explicitly mention

Johnson's City of Dallas title--Mayor of Dallas.  

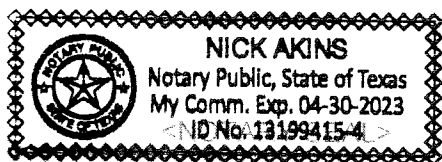
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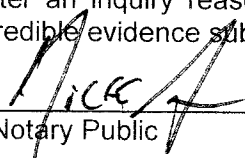


I CERTIFY THAT I HAVE READ THIS COMPLAINT, I FULLY UNDERSTAND ITS CONTENTS, AND I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF TEXAS THAT THE COMPLAINT STATES A VIOLATION OF CHAPTER 12A OF THE DALLAS CITY CODE, THAT THIS COMPLAINT IS NOT BEING PRESENTED FOR ANY IMPROPER PURPOSE, AND THE FOREGOING STATEMENTS AND EVIDENCE ARE TRUE AND CORRECT OR, TO THE BEST OF MY KNOWLEDGE, ARE SUPPORTED BY CREDIBLE EVIDENCE FORMED AFTER AN INQUIRY REASONABLE UNDER THE CIRCUMSTANCES. I UNDERSTAND THAT A COPY OF THIS COMPLAINT WILL BE SENT TO THE CHAIR OF THE ETHICS ADVISORY COMMISSION AND TO THE INDIVIDUAL CHARGED IN THIS COMPLAINT. ALL PAPERS AND COMMUNICATIONS RELATING TO A COMPLAINT MUST BE TREATED AS CONFIDENTIAL LAW UNLESS REQUIRED TO BE MADE PUBLIC BY THE PUBLIC INFORMATION ACT (CHAPTER 552, TEXAS GOVERNMENT CODE) OR OTHER APPLICABLE LAW.

  
\_\_\_\_\_  
Signature

Before me the undersigned authority, on the 22 day of April, 2021, personally appeared, Barry Jacobs, known to me to be the person whose name is subscribed hereto, and being duly sworn stated that such facts are true and correct, or, to the best of his/her knowledge, formed after an inquiry reasonable under the circumstances, the factual contentions are supported by credible evidence submitted in and with the complaint.



  
\_\_\_\_\_  
Notary Public  
Dallas County, Texas

My Commission expires:

04-30-2023

**Special Note:** Section 3.2 of the Ethics Advisory Commission Rules of Procedure states that "supplements to a complaint may only be filed within seven days after the city secretary's acceptance of the original completed complaint."

Should you have any questions concerning this form, please contact the City Secretary's Office, at (214) 670-3738 during regular business hours (8:15am – 5:15pm).

Upon completing **ALL** sections of this form, please hand deliver or send by certified mail with any attachments to:

Office of the City Secretary  
CITY HALL  
1500 Marilla Street – Suite 5DS  
Dallas, TX 75201

### Attachment I – Statement of Facts

1. Eric Lynn Johnson (“Johnson”) is the Mayor of the City of Dallas.
2. Donald Parish (“Parish”) is a candidate for City Council from District 7.
3. On information and belief, Johnson maintains an account with the social media platform, Twitter, under the name @Johnson4Dallas (“Johnson’s Twitter Account”).
4. On information and belief, Johnson and/or persons acting on Johnson’s behalf and at his behest have sole control over Johnson’s Twitter Account. Johnson’s Twitter Account has about 38,000 followers.
5. On information and belief, Johnson regularly publishes materials on the Johnson Account that are of interest to the public, such that Johnson’s Twitter Account has become broadly associated with Johnson in the eyes of the public.
6. On information and belief, Parish maintains an account with Twitter under the name @DonaldRParishJr (“Parish’s Twitter Account”). Parish’s Twitter Account has about 89 followers.
7. On information and belief, Parish and/or persons acting on Parish’s behalf and at his behest have sole control over Parish’s Twitter Account.
8. On or about April 19, 2021, Parish published a flyer (the “Endorsement”) announcing the endorsement by Johnson of Parish in the May 1, 2021 municipal elections (a copy of the Endorsement is included herein as Attachment II-A). The endorsement contained language identifying Johnson as “the leader of the city.”
9. On information and belief, the Endorsement was approved and authorized by Johnson.
10. On April 19, 2021, the Dallas Morning News published an article (the “DMN Article”) about Johnson’s endorsement of Parish bearing the headline “Mayor Eric Johnson backs opponent in City Council race over incumbent Adam Bazaldua.” (a copy of the DMN Article can be viewed at <https://www.dallasnews.com/news/elections/2021/04/19/dallas-mayor-eric-johnson-endorses-2nd-city-council-challenger-over-incumbent-in-south-dallas/> )
11. On or about April 19, 2021, a post containing a copy of the Endorsement (the “Parish Post”), together with a link to the DMN Article appeared on Parish’s Twitter Account (a copy of the Parish Post is included herein as Attachment II-B). The Parish Post also included the headline from the DMN Article, which mentioned Johnson’s City of Dallas title.
12. On information and belief, the Parish Post was approved and authorized by Parish and Johnson.
13. Complainant asserts that the Parish Post constitutes a political endorsement by Johnson and notes that the Parish Post includes mention of Johnson’s title—Mayor of Dallas.
14. On or about April 19, 2021, a post (the “Johnson Post”), republishing or “retweeting” the Parish Post, appeared on Johnson’s Twitter Account (a copy of the Johnson Post is included herein as Attachment II-C).
15. On information and belief, the Johnson Post was approved and authorized by Johnson.

16. Complainant asserts that the Johnson Post constitutes a political endorsement by Johnson and notes that the Johnson Post includes mention of Johnson's title—Mayor of Dallas.

Conclusion

Complainant maintains that not only has Johnson made political endorsements in the Johnson Post and the Parish Post that include mention of his City of Dallas title, Johnson has broadcast those endorsements via Twitter to approximately 38,000 people. Complainant seeks a ruling from this Board that Johnson's conduct as described above violates Section 12A-10(a) of the City of Dallas Code of Ethics. Plaintiff further seeks guidance from this Commission as to whether the inclusion of the words "the leader of the city," in the Endorsement also amounts to a "mention" of Johnson's office in violation of that statute.

**THE HONORABLE ERIC JOHNSON**

*SUPPORTS*

**DONALD  
PARISH**

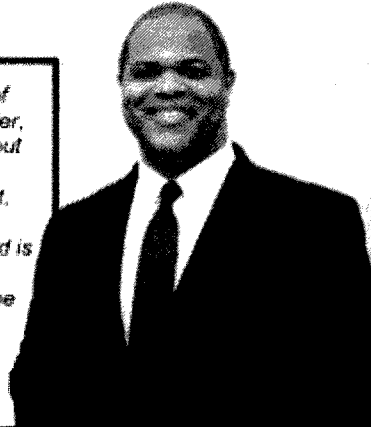
FOR THE 7TH DISTRICT

*Leadership for a change*



*"Donald Parish has been serving the residents of Dallas his entire life as a minister, nonprofit leader, and community servant. He genuinely cares about the people of District 7 and is someone who is committed to working with our police department, not against it, to make our neighborhoods safer. That is the type of leader we need at city hall and is the type of leader the people of this community, which I have represented for over a decade in the Legislature and now as the leader of the city, deserve."*

**THE HONORABLE ERIC JOHNSON**





Attachment II-B—Parish Post

← **Tweet**

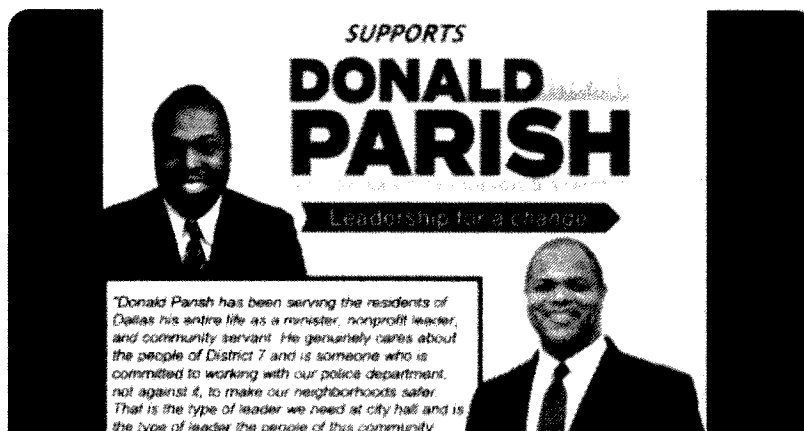


**Donald Parish**  
@DonaldRParishjr



"Johnson cited Parish's background as a pastor, nonprofit founder and called him the type of leader needed at City Hall."


"He genuinely cares about the people...and is committed to working with our police department...to make our neighborhoods safer"





Dallas Mayor Eric Johnson endorses 2nd City Council challenger over incumbent...  
The campaign of Donald Parish, who is seeking to represent District 7 in South Dallas, announced Monday that Dallas Mayor Eric Johnson backs him in the...  
@dallasnews.com

1:51 PM · Apr 19, 2021 · Twitter for iPhone

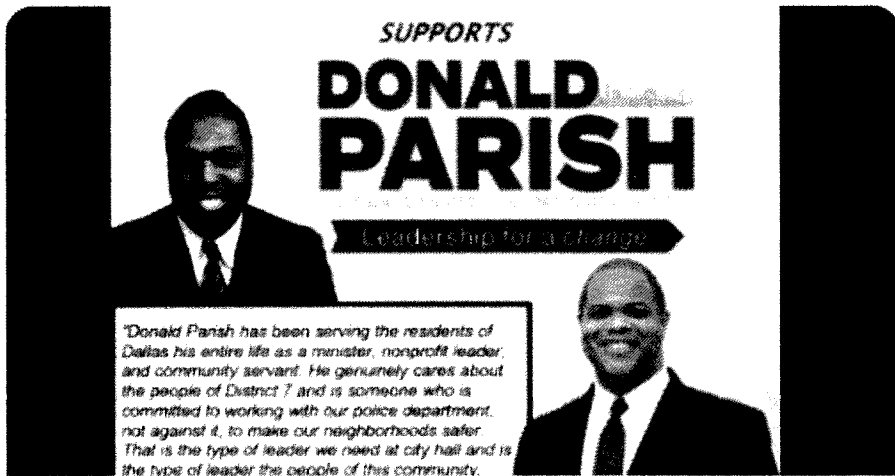
Attachment IIC – Johnson Post

 **Eric Johnson**   
17.3K Tweets Follow

 Eric Johnson Retweeted

 **Donald Parish** @DonaldRParishJr · Apr 19 ...  
"Johnson cited Parish's background as a pastor, nonprofit founder and called him the type of leader needed at City Hall."

"He genuinely cares about the people...and is committed to working with our police department...to make our neighborhoods safer"



Dallas Mayor Eric Johnson endorses 2nd City Council challenger over i...  
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[dallasnews.com](http://dallasnews.com)

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