

**SWORN COMPLAINT
BEFORE
THE TEXAS ETHICS COMMISSION**

Office Use Only

Docket Number

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I. IDENTITY OF COMPLAINANT

I, NELSON ALEX WINSLOW, complainant,
(full name of individual filing the complaint)

hereby file this sworn complaint with the Texas Ethics Commission. My address is

1300 GUADALUPE ST. STE. 108 AUSTIN, TX 78701
(full mailing or street address, including P.O. box number or street, city, state, and zip code)

My telephone number is 512-381-1111
(telephone number, including area code)

II. IDENTITY OF RESPONDENT

The respondent is NATHAN L. HECHT
(full name of respondent)

The respondent holds the position or title of JUSTICE, TEXAS SUPREME COURT,
(position or title held by respondent)

PLACE 6

The respondent's address is SUPREME COURT OF TEXAS P.O. Box 12248
(full mailing or street address, including P.O. box number or street, city, state, and zip code of respondent)

AUSTIN, TX 78711

The respondent's telephone number is 512-463-1312
(telephone number of respondent, including area code)

Attach additional pages, if necessary.

III. NATURE OF ALLEGED VIOLATION

(Include the specific law or rule alleged to have been violated, if possible. The Texas Ethics Commission has jurisdiction to enforce *only* Chapters 302, 305, and 572 of the Government Code and Title 15 of the Election Code.)

JUSTICE HECHT ACCEPTED AND RECEIVED A \$100,000 DISCOUNT ON LEGAL SERVICES IN VIOLATION OF ELECTIONS CODE SEC. 253.155(b) AND SEC. 253.157(a)(2). ADDITIONALLY, HE FAILED TO REPORT THIS IN-KIND CONTRIBUTION IN VIOLATION OF ELECTION CODE SEC. 254.031 AND SEC. 254.0611.

Attach additional pages, if necessary.

IV. STATEMENT OF FACTS

(State the facts constituting the alleged violation, including the dates on which or the period of time in which the alleged violation occurred. Identify allegations of fact not personally known to the complainant but alleged on information and belief. Please use simple, concise, and direct statements.)

SEE ATTACHED

Attach additional pages, if necessary.

V. LISTING OF DOCUMENTS AND OTHER MATERIALS

(List all documents and other materials filed with this complaint. Additionally, list all other documents and other materials that are relevant to this complaint and that are within your knowledge, including their location, if known.)

A) STATEMENT OF FACTS

B) NEWS ARTICLE FROM THE FORT WORTH STAR-TELEGRAM

C) CAMPAIGN FINANCE REPORT FOR JUSTICE HECHT,
SEMI-ANNUAL JULY 2007

D) CAMPAIGN FINANCE REPORT FOR JUSTICE HECHT,
SEMI-ANNUAL JANUARY 2007

Attach additional pages, if necessary.

VI. AFFIDAVIT
BASED ON PERSONAL KNOWLEDGE

(Execute this affidavit if the acts alleged are within your direct personal knowledge.)

I, _____, complainant,
swear that I have knowledge of the facts alleged in this complaint
and that the information contained in this complaint is true
and correct.

Signature of complainant

AFFIX NOTARY STAMP / SEAL ABOVE

Sworn to and subscribed before me, by the said _____, this
the _____ day of _____, 20 _____, to certify which, witness my hand and seal of office.

Signature of officer administering oath

Print name of officer administering oath

Title of officer administering oath

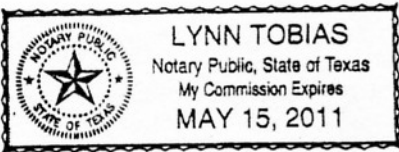
VII. AFFIDAVIT

BASED ON INFORMATION AND BELIEF

(Execute this affidavit if the acts alleged are not within your
direct personal knowledge, but are based on reasonable belief.)

I, Nelson A. Winslow, complainant,
swear that I have reason to believe and do believe that the violation alleged in
this complaint has occurred. The source and basis of my information and belief
is TEC filings and news
accounts.

N. Winslow
Signature of complainant



AFFIX NOTARY STAMP / SEAL ABOVE

Sworn to and subscribed before me, by the said Nelson A Winslow, this
the 23 day of July, 20 07, to certify which, witness my hand and seal of office.

Lynn Tobias _____
Signature of officer administering oath Print name of officer administering oath Title of officer administering oath

IV. STATEMENT OF FACTS

In August of 2006, Justice Hecht was represented by Charles Babcock of Jackson Walker in a hearing before the State Commission on Judicial Conduct. In this hearing Justice Hecht challenged the public admonishment he had received from the Commission in relation to comments he made about Harriet Miers while she was being considered for appointment to the United States Supreme Court. Justice Hecht was billed approximately \$450,000 for this legal representation. According to media reports, however, Justice Hecht and Jackson Walker negotiated a discount of more than \$100,000 on his bill sometime after the August hearing. This discount constitutes an in-kind contribution of legal services that appears to be in excess of the \$30,000 limit allowable by law.

As payment to a law firm for representation is an acceptable political expenditure according to the Texas Ethics Commission, Justice Hecht had to report the amount he paid to Jackson Walker. According to reports filed with the Ethics Commission, Justice Hecht paid \$28,671.67 to the firm on December 5, 2006, and \$313,744.85 on April 17, 2007, for a total of \$342,416.52. This is more than \$100,000 less than the original amount billed for his legal services.

Campaign contributions are limited to \$5,000 per individual per Elections Code Sec. 253.155(b) and \$30,000 per law firm per Sec. 253.157(a)(2). This \$100,000 discount given by Charles Babcock and Jackson Walker and accepted by Justice Hecht clearly appears to exceed the maximum limit.

Additionally, Justice Hecht failed to report this in-kind contribution in violation of Elections Code Sec. 254.031 and Sec. 254.0611.
