

THE STATE OF TEXAS §
 §
COUNTY OF TRAVIS §

KNOW ALL PERSONS BY THESE PRESENTS:

COMPLAINT

TO THE DISTRICT ATTORNEY OF SAID COUNTY:
TO THE COUNTY ATTORNEY OF SAID COUNTY:

NOW COMES the undersigned complainant and, pursuant to article 2.04 and article 2.05 of the Texas Code of Criminal Procedure, hereby makes the following complaint:

My name is “Craig L. McDonald,” my date of birth is March 15, 1950, and my address is 1102 Live Oak Ridge, Austin, Texas, 78746, United States of America. I am of sound mind and capable of making this declaration. I have good reason to believe, and do believe, that:

James Richard “Rick” Perry,
the Governor of the State of Texas,

on or about the tenth day of June, A.D., in the County of Travis and State of Texas, committed one or more offenses in violation of Title 8 of the Texas Penal Code, Offenses Against Public Administration and against the peace and dignity of the State.

In particular, I have reason to believe, and do believe, that on or about the aforesaid date, in the aforesaid county and state, the aforesaid James Richard “Rick” Perry threatened to use the official power of his elected office to veto the legislative budget appropriation for the Travis County District Attorney’s Public Integrity Unit unless Rosemary Lehmberg, the elected Travis County District Attorney resigned her office. Further, the aforesaid James Richard “Rick” Perry subsequently did use the power of his office on the fifteenth of June, A.D. 2013, to veto the legislative appropriation to fund the Travis County District Attorney’s Public Integrity Unit.

I further believe that the aforesaid James Richard “Rick” Perry’s actions likely violated Texas Penal Code § 36.03 COERCION OF A PUBLIC SERVANT OR VOTER, Penal Code § 36.02 BRIBERY, Penal Code § 39.02 ABUSE OF OFFICIAL CAPACITY, and Penal Code § 39.03 OFFICIAL OPPRESSION.

I have good reason to believe, and do believe, that the aforesaid James Richard “Rick” Perry’s threatened action to veto the budget appropriation for the Public Integrity Unit unless Rosemary Lehmberg’s resignation was forthcoming was communicated on or about the tenth of June, A.D., 2013. The threat was prominently reported by journalist Mike Ward and appeared on the front page of the Austin American-Statesman’s June 11, 2013 edition. Unnamed officials in the Governor’s office confirmed the threat. Rich Parsons, the Governor’s spokesperson confirmed to Mike Ward that Governor Perry’s position regarding

the possible veto and the District Attorney's resignation had been clearly communicated to Texas Senator Kirk Watson.

The public records indicate that Travis County District Attorney Rosemary Lehmberg has not resigned her office. The public records also indicate that on the fifteenth day of June, A.D, 2013, the aforesaid James Richard "Rick" Perry acting in his official capacity of Governor of the State of Texas vetoed the budget appropriation for the Travis County District Attorney's Public Integrity Unit.

The media account cited above, which was confirmed and supported by numerous other media sources and was never denied by spokespersons for Governor Perry or by Governor Perry himself between the tenth of June and fifteenth of June, the date in which he vetoed the legislation in question, gives me good reason to believe that Governor Perry violated the Texas Penal Code by communicating offers and threats under which he would exercise his official discretion to veto the appropriation for the Public Integrity Unit unless District Attorney Rosemary Lehmberg exercised her official discretion and resigned.

I hereby declare under penalty of perjury that the foregoing is true and correct.

EXECUTED IN Travis County, State of Texas, on this, the twenty-sixth, day of June, A.D. 2013.

Complainant