



# DOLCEFINO CONSULTING

## **Criminal Complaint filed by Dolcefino Consulting against**

Thomas Lambert

President and Chief Executive Officer, Metropolitan Transit Authority of Harris County

1900 Main St., Houston, Texas 77002

**Complaining Party:** Dolcefino Consulting, 3701 Kirby, Suite 560, Houston, TX 77098

Wayne Dolcefino, SSN# [REDACTED], DOB: 12/26/1956

**Type of Offense:** Sec. 255.003. Unlawful Use of Public Funds for Political Advertising. (a) An officer or employee of a political subdivision may not knowingly spend or authorize the spending of public funds for political advertising.

**Dates of Offense:** Ongoing

**Location of Offense:** 1900 Main St., Houston, Texas 77002

**Brief Summary Statement:** Thomas Lambert, President and Chief Executive Officer of the Metropolitan Transit Authority of Harris County ("METRO") has knowingly authorized the spending of millions of dollars to advertise METRONEXT and the 2019 METRO bond election. These advertisements, taken as a whole, are clearly intended to advertise for METRO and influence the passage of the bond referendum.

**Details of Offense:** See attached statement from Wayne Dolcefino

**Index of Documents:** See below

**Copies of Documents:** See attached copies and (CRIMINAL COMPLAINT 09-30-2019.zip)

**List of Witnesses:** None.

**Copies of Witness Statements:** None.

**Agencies reported:** Metropolitan Transit Authority of Harris County

**Complaint Filed with suspect agency?** No.

**Is there a Civil Lawsuit Pending?** No.

**Notarized Form:** See attached.

**office 713-360-6911**

**wayne@dolcefino.com**



# DOLCEFINO

## CONSULTING

### Index of Documents:

1. CRIMINAL COMPLAINT 09-30-2019.zip
  - a. Carrin Patman METRO Biography
  - b. Thomas Lambert METRO Biography
  - c. Bond Referendum Language
  - d. Texas Elections Code 255.003 Prohibiting Advertising
  - e. "METRONext: Plan Highlights" Video
  - f. "What's Next With METRNext" Video
  - g. "What is METRO Rapid?" Video
  - h. METRO Flyers
  - i. METRO Youtube Videos
  - j. Citizens for Public Transit Solicitation
  - k. Excerpts from Citizens for Public Transit Texas Ethics Commission Filing
  - l. METRO Advertising Expenses
  - m. METRO Media Buys
  - n. METRO Board of Directors Meeting Packet
  - o. August 2019 Email Thread