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July 23, 2025

By E-Mail and Certified Mail

Honorable Al Honigblum
Mayor
City of Alamo Heights
6116 Broadway
San Antonio, TX 78209

Honorable Blake M. Bonner
Council Member Place 3
City of Alamo Heights
6116 Broadway
San Antonio, TX 78209

Honorable Lawson Jessee
Council Member Place 1
City of Alamo Heights
6116 Broadway
San Antonio, TX 78209

Honorable Lynda Billa Burke
Council Member Place 4
City of Alamo Heights
6116 Broadway
San Antonio, TX 78209

Re: The Argyle Specific Use Permit Application

Dear Mayor Honigblum and Council Members Jessee, Bonner, and Burke:

As you are aware, The Argyle – a private club operating at 934 Patterson Avenue in Alamo Heights – has applied for a Specific Use Permit that would authorize its operation as a venue for events with "contracted attendance" exceeding 1,000 guests (the "SUP Application"). It is our understanding that the SUP Application is currently scheduled to be taken up for consideration by the City Council on Monday, August 11, 2025.

My client understands that each of you is a member of The Argyle.

Chapter 2, Article VI of the City of Alamo Heights Code of Ordinances establishes a code of ethics and conduct intended to assure that the citizens and businesses of the city have a "fair, ethical and accountable local government which earns the public's full confidence for integrity." § 2-151. To that end, the city's officials and employees are required, among other things, to "[c]omply with both the letter and spirit of the laws and policies affecting the operations of government." § 2-151.

The code of ethics includes the following provisions:

§ 2-153 **Act in the public interest.**

Recognizing that stewardship of the public interest must be their primary concern, city officials and employees will work for the common good of the people of Alamo Heights and not for any private or personal interest, and they will assure fair and equal treatment of all persons, claims and transactions coming before the city council, boards, commissions, and committees.

§ 2-155 **Conduct of city officials and employees.**

The professional and personal conduct of city officials and employees must be above reproach and *avoid even the appearance of impropriety*. . . .

§ 2-160 **Conflicts of interest and disclosure.**

City officials and employees shall familiarize themselves and abide by the following conflicts of interest and disclosure statutes and principles:

- (6) In order to assure their independence and impartiality on behalf of the public good, *city officials and employees are prohibited from using their positions to influence government decisions in which they have a personal interest.*

§ 2-171 **Compliance and enforcement.**

The city's code of ethics and conduct expresses standards of ethical conduct expected for city officials and employees of the city council, boards, commissions, and committees. *City officials and employees themselves have the primary responsibility to assure that ethical standards are understood and met, and that the public can continue to have full confidence in the integrity of government.* The chairs of boards, commissions, and committees and the mayor have the additional responsibility to intervene when city officials' actions appear to be in violation of the code of ethics and conduct and are brought to their attention. The city council may impose sanctions, such as reprimand, formal censure, or loss of committee assignment, on city officials whose conduct does not comply with the city's ethical standards. The city council also may act to remove members of boards, commissions, and committees from office.

(Emphasis added.)

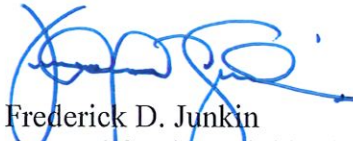
It is apparent that, as members of The Argyle, each of you has a personal interest in the disposition of the SUP Application. Accordingly, the city's code of ethics requires that you recuse yourselves from participation in any deliberation and vote on the SUP Application and any other matter involving The Argyle that comes before City Council.

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To avoid the necessity for litigation to enforce the requirements imposed by the city's code of ethics, please submit an appropriate statement of recusal to the City Manager no later than Wednesday, July 30, 2025.

Thank you for your attention and consideration.

Sincerely,



Frederick D. Junkin
Counsel for the Neighborhood
Preservation League of Alamo Heights

cc: Buddy Kuhn, City Manager
Frank J. Garza, City Attorney
Karl P. Baker, Council Member Place 2
Trey Jacobson, Council Member Place 5
By E-Mail