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8  
9 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**

10 **STATE OF CALIFORNIA**

11 In the Matter of

FPPC Case No. 2020-00203

12 **STIPULATION, DECISION AND ORDER**

13 KIEU HOANG,

Date Submitted to Commission: April 2024

14  
15 Respondent.

16  
17 **INTRODUCTION**

18 Respondent, Kieu Hoang (“Hoang”), is an individual that qualified as a major donor committee  
19 and an independent expenditure committee. Hoang engaged in campaign activities in 2019, 2020, and  
20 2021 as a major donor committee and in 2020 as an independent expenditure committee under the  
21 Political Reform Act (the “Act”).<sup>1</sup> The Act requires major donor committees and independent  
22 expenditure committees to timely file certain campaign statements and reports to disclose their  
23 campaign activities. Hoang violated the Act by failing to timely file semi-annual campaign statements  
24 and 24-hour contribution and independent expenditure reports.

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28 <sup>1</sup> The Political Reform Act is contained in Government Code §§ 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practice Commission are contained in §§ 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

1 **SUMMARY OF THE LAW**

2 The Act and its regulations are amended from time to time. The violations in this case occurred  
3 in 2019, 2020, and 2021. For this reason, all legal references and discussions of law pertain to the Act’s  
4 provisions as they existed at that time.

5 **Need for Liberal Construction and Vigorous Enforcement of the Political Reform Act**

6 When enacting the Act, the people of California found and declared that previous laws regulating  
7 political practices suffered from inadequate enforcement by state and local authorities.<sup>2</sup> Thus, it was  
8 decreed the Act “should be liberally construed to accomplish its purposes.”<sup>3</sup>

9 A central purpose of the Act is to promote transparency by ensuring that receipts and  
10 expenditures in election campaigns are fully and truthfully disclosed so that voters are fully informed  
11 and improper practices are inhibited.<sup>4</sup> Another purpose of the Act is to provide adequate enforcement  
12 mechanisms so that the Act will be “vigorously enforced.”<sup>5</sup>

13 **Independent Expenditure and Major Donor Committee**

14 Under the Act, “committee” means any person or combination of persons who directly or  
15 indirectly makes independent expenditures totaling \$1,000 or more in a calendar year.<sup>6</sup> This type of  
16 committee is known as an independent expenditure committee.

17 Further, “committee” means any person or combination of persons who directly or indirectly  
18 makes contributions totaling \$10,000 or more in a calendar year to or at the behest of candidates or  
19 committees.<sup>7</sup> This type of committee is known as a major donor committee.

20 **Independent Expenditure**

21 “Independent expenditure” means an expenditure made by any person, including a payment of  
22 public moneys by a state or local government agency, in connection with a communication which  
23 expressly advocates the election or defeat of a clearly identified candidate or the qualification, passage  
24 or defeat of a clearly identified measure, or taken as a whole and in context, unambiguously urges a  
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26 <sup>2</sup> Section 81001, subd. (h).

27 <sup>3</sup> Section 81003.

28 <sup>4</sup> Section 81002, subd. (a).

<sup>5</sup> Section 81002, subd. (f).

<sup>6</sup> Section 82013, subd. (b).

<sup>7</sup> Section 82013, subd. (c).

1 particular result in an election but which is not made to or at the behest of the affected candidate or  
2 committee.<sup>8</sup>

### 3 **Duty to File Semi-Annual Campaign Statements**

4 All major donor and independent expenditure committees shall file semi-annual campaign  
5 statements each year no later than July 31 for the period ending June 30, and no later than January 31 for  
6 the period ending December 31, if they have made contributions or independent expenditures during the  
7 six-month period before the closing date of the statements.<sup>9</sup>

### 8 **Duty to File 24-Hour Contribution Reports**

9 Under the Act, a “late contribution” includes a contribution that totals in the aggregate \$1,000 or  
10 more and is made to or received by a candidate, a controlled committee, or a committee formed or  
11 existing primarily to support or oppose a candidate or measure during the 90-day period preceding the  
12 date of the election, or on the date of the election, at which the candidate or measure is to be voted on.<sup>10</sup>  
13 Each candidate or committee that makes or receives a late contribution shall report the late contribution  
14 within 24 hours of the time it is made or received.<sup>11</sup>

### 15 **Duty to File 24-Hour Independent Expenditure Reports**

16 “Late independent expenditure” means an independent expenditure that totals in the aggregate  
17 \$1,000 or more and is made for or against a specific candidate or measure involved in an election during  
18 the 90-day period preceding the date of the election or on the date of the election.<sup>12</sup> Each committee that  
19 makes a late independent expenditure shall report the late independent expenditure within 24 hours of  
20 the time it is made.<sup>13</sup>

### 21 **Filing Due Dates**

22 Whenever the Act requires that a statement or report be filed prior to or not later than a specified  
23 date, and the deadline falls on a Saturday, Sunday, or official state holiday, the filing deadline for such a  
24 statement or report shall be extended to the next regular business day.<sup>14</sup>

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25 <sup>8</sup> Section 82031.

26 <sup>9</sup> Section 84200, subd. (b).

27 <sup>10</sup> Section 82036, subd. (a).

28 <sup>11</sup> Section 84203.

<sup>12</sup> Section 82036.5.

<sup>13</sup> Section 84204.

<sup>14</sup> Regulation 18116, subd. (a).

1 **SUMMARY OF THE FACTS**

2 According to Hoang’s campaign statements, he qualified as a major donor committee for three  
3 separate calendar years related to four elections: the November 3, 2019 General Election, the March 3,  
4 2020 Primary Election, the April 7, 2020 Special Election, and the August 16, 2021 Special Election.  
5 First, Hoang qualified as a major donor committee during the January 1, 2019 through June 30, 2019  
6 reporting period, making \$1,083,932 in contributions. Second, Hoang qualified as a major donor  
7 committee during the January 1, 2020 through June 30, 2020 reporting period, making \$1,026,649 in  
8 contributions. Third, Hoang qualified as a major donor committee on August 13, 2021, upon making a  
9 \$25,000 contribution.

10 According to Hoang’s campaign statements, Hoang qualified as an independent expenditure  
11 committee on March 16, 2020 upon making a \$14,040 independent expenditure to SET TV supporting  
12 the recall of Westminster City Councilmembers Kimberly Ho, Tri Ta, and Charlie Nguyen in the April  
13 7, 2020 Special Election. In total, Hoang made \$52,172 in independent expenditures in 2020.

14 **Failure to Timely File Semi-Annual Campaign Statements**

15 As a major donor committee, Hoang was required to file semi-annual campaign statements for  
16 reporting periods in 2019, 2020, and 2021. In 2019, Hoang was required to timely file semi-annual  
17 campaign statements for the reporting periods of January 1, 2019 to June 30, 2019 and July 1, 2019 to  
18 December 31, 2019 by the July 31, 2019 and January 31, 2020 due dates. Hoang filed a semi-annual  
19 campaign statement with the reporting period of January 1, 2019 to December 31, 2019 on November  
20 24, 2020. Hoang reported \$1,083,932 in contributions on the 2019 semi-annual campaign statement.

21 In 2020, Hoang was required to file a semi-annual campaign statement for the reporting period of  
22 January 1, 2020 to June 30, 2020 by the July 31, 2020 due date. However, no semi-annual campaign  
23 statement was required for the second half of 2020 as no contributions were made. Hoang filed a semi-  
24 annual campaign statement with the reporting period of January 1, 2020 to June 30, 2020 on August 12,  
25 2020, 12 days late, and filed amendments on November 30, 2020 and December 16, 2020. Hoang  
26 reported \$1,026,649 in contributions on the 2020 semi-annual campaign statement.

27 In 2021, Hoang was required to file a semi-annual campaign statement for the reporting period of  
28 July 1, 2021 to December 31, 2021 by the January 31, 2022 due date. However, no semi-annual

1 campaign statement was required for the first half of 2021 as no contributions were made. Hoang never  
2 filed a semi-annual campaign statement with the reporting period of July 1, 2021 to December 31, 2021.  
3 According to a 24-hour contribution report filed on August 13, 2021 by Hoang, \$25,000 in contributions  
4 should have been reported on the 2021 semi-annual campaign statement.

5 The late filed semi-annual campaign statements are summarized below:

6 <b>Reporting Period</b>	<b>Due Date</b>	<b>Date Filed</b>	<b>Days Late</b>	<b>Amount</b>
7 1/1/19 – 6/30/19	7/31/19	11/24/20	482	\$1,083,932 for all of 8 2019
9 7/1/19 – 12/31/19	1/31/20	11/24/20	298	\$1,083,932 for all of 10 2019
11 1/1/20 – 6/30/20	7/31/20	8/12/20	12	\$1,026,649
12 7/1/21 – 12/31/21	1/31/22	N/A	N/A	\$25,000

#### 13 **Failure to Timely File 24-Hour Contribution/Expenditure Reports**

14 As a major donor committee, Hoang was also required to file 24-hour contribution reports within  
15 24 hours of making a late contribution. The 90-day period preceding the November 3, 2019 General  
16 Election began on August 5, 2019. The 90-day period preceding the March 3, 2020 Primary Election  
17 began on December 4, 2019. The 90-day period preceding the April 7, 2020 Special Election began on  
18 January 8, 2020. The 90-day period preceding the August 16, 2021 Special Election began on May 18,  
19 2021.

20 According to Hoang's semi-annual campaign statements and 24-hour contribution reports,  
21 Hoang was required to file eight 24-hour contribution reports. Hoang failed to timely file 24-hour  
22 contribution reports as follows:

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DATE	NAME OF RECIPIENT(S)	AMOUNT	DUE DATE	DATE FILED
1/13/20	Jamison Power for Westminster City Council and Tai Do for City Council	\$20,000	1/14/20	9/2/20
2/10/20	Brad Sherman for Assembly	\$1,400	2/11/20	9/2/20
2/27/20	Neighbors for an Affordable San Jose, Yes on E	\$250,000	2/28/20	9/2/20
3/2/20	Tam Do for City Council 2020	\$10,000	3/3/20	9/2/20
3/6/20	We Deserve Better – Yes on the Westminster Recall of Mayor Tri Ta and Council Members	\$100,000	3/9/20	9/2/20
3/17/20	We Deserve Better – Yes on the Westminster Recall of Mayor Tri Ta and Council Members	\$100,000	3/18/20	N/A
3/24/20	We Deserve Better – Yes on the Westminster Recall of Mayor Tri Ta and Council Members	\$100,000	3/25/20	N/A
3/31/20	We Deserve Better – Yes on the Westminster Recall of Mayor Tri Ta and Council Members	\$50,000	4/1/20	N/A

As an independent expenditure committee, Hoang was required to file 24-hour independent expenditure reports within 24 hours of making a late independent expenditure.

According to Hoang’s semi-annual campaign statements and 24-hour independent expenditure reports, Hoang was required to file three 24-hour independent expenditure reports for late independent expenditures supporting the recall of Westminster City Councilmembers Tri Ta, Kimberly Ho, and Chi Charlie Nguyen. Hoang failed to timely file 24-hour independent expenditure reports as follows:

DATE	NAME OF RECIPIENT(S)	AMOUNT	DUE DATE	DATE FILED
3/16/20	SET TV	\$14,040	3/17/20	N/A
3/26/20	Saigon Radio Hai Ngoai, XEM TV, and Viet Po Television	\$25,340	3/27/20	N/A
5/13/20	Little Saigon TV	\$2,520	5/14/20	N/A

1 In summary, Hoang failed to timely file eight 24-hour contribution reports and three 24-hour  
2 independent expenditure reports prior to the relevant elections in 2020 to disclose nine late contributions  
3 made totaling \$631,400 and five late independent expenditures made totaling \$41,900.

## 4 VIOLATIONS

### 5 **Count 1: Failure to Timely File Semi-Annual Campaign Statements**

6 Hoang failed to timely file a semi-annual campaign statement for the reporting period ending  
7 June 30, 2019 by the July 31, 2019 due date, in violation of Government Code Section 84200,  
8 subdivision (b).  
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### 10 **Count 2: Failure to Timely File Semi-Annual Campaign Statements**

11 Hoang failed to timely file a semi-annual campaign statement for the reporting period ending  
12 December 31, 2019 by the January 31, 2020 due date, in violation of Government Code Section 84200,  
13 subdivision (b).

### 14 **Count 3: Failure to Timely File Semi-Annual Campaign Statements**

15 Hoang failed to timely file a semi-annual campaign statement for the reporting period ending  
16 June 30, 2020 by the July 31, 2020 due date, in violation of Government Code Section 84200,  
17 subdivision (b).

### 18 **Count 4: Failure to Timely File Semi-Annual Campaign Statements**

19 Hoang failed to timely file a semi-annual campaign statement for the reporting period ending  
20 December 31, 2021 by the January 31, 2022 due date, in violation of Government Code Section 84200,  
21 subdivision (b).

### 22 **Count 5: Failure to Timely File 24-Hour Contribution Reports**

23 Prior to the 2020 elections, Hoang failed to timely file two 24-hour contribution reports totaling  
24 \$251,400, by the February 11, 2020 and February 28, 2020 respective due dates, in violation of  
25 Government Code Section 84203.  
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1 **Count 6: Failure to Timely File 24-Hour Contribution Reports**

2 Prior to the 2020 elections, Hoang failed to timely file three 24-hour contribution reports totaling  
3 \$130,000, by the January 14, 2020, March 3, 2020, and March 9, 2020 respective due dates, in violation  
4 of Government Code Section 84203.

5 **Count 7: Failure to Timely File 24-Hour Contribution Reports**

6 Prior to the 2020 elections, Hoang failed to timely file three 24-hour contribution reports totaling  
7 \$250,000, by the March 18, 2020, March 25, 2020, and April 1, 2020 respective due dates, in violation  
8 of Government Code Section 84203.

9 **Count 8: Failure to Timely File 24-Hour Independent Expenditure Reports**

10 Prior to the 2020 elections, Hoang failed to timely file three 24-hour independent expenditure  
11 reports for five late independent expenditures made, totaling \$41,900, by the March 17, 2020, March 27,  
12 2020, and May 14, 2020 respective due dates, in violation of Government Code Section 84204.

13 **PROPOSED PENALTY**

14 This matter consists of eight counts. The maximum penalty that may be imposed is \$5,000 per  
15 count. Thus, the maximum penalty that may be imposed here is \$40,000.<sup>15</sup>

16 This case is excluded from the Tier One Streamline Program because Hoang's contributions for  
17 calendar years 2019 and 2020 each exceeded \$50,000.<sup>16</sup> This case is not eligible for inclusion in the Tier  
18 Two Streamline Program because Hoang's contributions for calendar year 2020 exceeded \$150,000 and  
19 more than three statements or reports were late during that calendar year.<sup>17</sup>

20 In determining the appropriate penalty for a particular violation of the Act, the Enforcement  
21 Division considers the typical treatment of a violation in the overall statutory scheme of the Act, with an  
22 emphasis on serving the purposes and intent of the Act. Additionally, the Enforcement Division  
23 considers the facts and circumstances of the violation in the context of the following factors set forth in  
24 Regulation 18361.5 subdivision (e)(1) through (8): (1) The extent and gravity of the public harm caused  
25 by the specific violation; (2) The level of experience of the violator with the requirements of the  
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28 <sup>15</sup> Section 83116, subd. (c).

<sup>16</sup> Regulation 18360.1, subd. (d)(13)(B)(ii)(a).

<sup>17</sup> Regulation 18360.3, subd. (d)(10)(B)(ii)(a).

1 Political Reform Act; (3) Penalties previously imposed by the Commission in comparable cases; (4) The  
2 presence or absence of any intention to conceal, deceive or mislead; (5) Whether the violation was  
3 deliberate, negligent or inadvertent; (6) Whether the violator demonstrated good faith by consulting the  
4 Commission staff or any other governmental agency in a manner not constituting complete defense  
5 under Government Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern  
6 and whether the violator has a prior record of violations of the Political Reform Act or similar laws; and  
7 (8) Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide  
8 full disclosure.<sup>18</sup>

9 The public harm inherent in campaign late-filing violations is that the public is deprived of  
10 important, time-sensitive information regarding campaign activity. Here, Hoang engaged in over \$2  
11 million in political activity and failed to timely file numerous campaign statements and reports,  
12 including failing to file any 24-hour contribution and independent expenditure reports before the  
13 relevant elections. However, Hoang's failure to timely file 24-hour contribution reports is mitigated  
14 because a majority of Hoang's campaign activity was disclosed by the recipient committees prior to the  
15 relevant elections on pre-election campaign statements and/or 24-hour contribution reports.

16 In this case, the evidence does not support an intent to conceal, deceive or mislead the public as  
17 to Hoang's campaign activities. Hoang filed semi-annual campaign statements and 24-hour reports upon  
18 Enforcement contact. Additionally, Hoang paid for advertisements and the proper advertisement  
19 disclosures were included identifying Hoang as the source.

20 The violations here appear to be negligent. Hoang was unsophisticated and inexperienced with  
21 the Act, but the Enforcement Division investigation confirmed that Hoang received a major donor  
22 notification from at least one of the recipient committees in August of 2019. Thus, Hoang was put on  
23 notice in at least August 2019 of potential filing obligations yet failed to file any campaign statements or  
24 reports until August 2020 at the earliest. Also, Hoang has no prior enforcement history. The  
25 Enforcement Division does not have any evidence that Hoang consulted with Commission staff or any  
26 other governmental agency regarding their campaign filing obligations. However, Hoang has been fully  
27 cooperative with the Enforcement Division in this matter.

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<sup>18</sup> Regulation 18361.5, subd. (e).

1 The Commission considers penalties in prior cases with the same or similar violations and  
2 comparable facts.

3 *In the Matter of Lundgren Management Corporation*; FPPC Case No. 2021-00098. Respondent,  
4 a major donor committee, failed to timely file one semi-annual campaign statement to disclose the  
5 contributions it made in 2016 totaling \$79,950 (1 count) and six 24-hour contribution reports to disclose  
6 late contributions it made totaling \$101,450 (2 counts). The Commission approved a penalty of \$2,500  
7 for each of these counts, totaling \$7,500.

8 *In the Matter of National United Farm Workers PAC and Armando Elenes*; FPPC Case No.  
9 2018-01352. Respondent, a general purpose committee, failed to timely file three 24-hour independent  
10 expenditure reports totaling \$38,957. The Commission approved a penalty of \$2,500 for the 24-hour  
11 reports count.

12 A significantly higher penalty than that approved in *Lundgren* is recommended for most of the  
13 counts related to major donor activities. Here, Hoang failed to timely file four semi-annual campaign  
14 statements disclosing the contributions made during 2019 and 2020 totaling \$1,083,932 and \$1,026,649  
15 respectively, a significantly higher amount than that at issue in *Lundgren*. In aggravation, Hoang  
16 received a major donor committee notification from recipient committees and still failed to timely file  
17 the campaign statements. In addition, these statements were generally either extremely late and after the  
18 relevant election or never filed at all. Next, Hoang failed to timely file eight 24-hour contribution reports  
19 to disclose contributions made totaling \$631,400, a significantly higher amount than that at issue in  
20 *Lundgren*. These statements were also extremely late or never filed at all. Count 7 warrants an even  
21 higher penalty than 5 and 6 because the 24-hour contribution reports were never filed.

22 A similar penalty amount than that approved in *Lundgren* is recommended for the fourth count  
23 of failure to timely file a semi-annual campaign statement. Despite the activity being much lower at  
24 \$25,000, the semi-annual campaign statement in the fourth count was never filed. Whereas the semi-  
25 annual campaign statement in *Lundgren* was filed 18 days late.

26 Furthermore, a similar penalty than that approved in *United* is recommended. Here, Hoang failed  
27 to timely file three 24-hour independent expenditure reports totaling \$41,900. The number of reports and  
28 total amount of expenditures is nearly identical to those in *United*.

1 Therefore, a total penalty of \$30,000 is recommended; 3 counts of \$4,500 and 1 count of \$2,500  
2 for failing to timely file semi-annual campaign statements, 2 counts of \$3,500 and 1 count of \$4,500 for  
3 failing to timely file 24-hour contribution reports, and 1 count of \$2,500 for failing to timely file 24-hour  
4 independent expenditure reports.

5 Under these circumstances, it is respectfully submitted that imposition of an agreed upon penalty  
6 in the amount of \$30,000 is justified, as reflected in the chart below:

Count	Violation	Penalty
1	Failure to Timely File Semi-Annual Campaign Statement	\$4,500
2	Failure to Timely File Semi-Annual Campaign Statement	\$4,500
3	Failure to Timely File Semi-Annual Campaign Statement	\$4,500
4	Failure to Timely File Semi-Annual Campaign Statement	\$2,500
5	Failure to Timely File 24-Hour Contribution Reports	\$3,500
6	Failure to Timely File 24-Hour Contribution Reports	\$3,500
7	Failure to Timely File 24-Hour Contribution Reports	\$4,500
8	Failure to Timely File 24-Hour Independent Expenditure Reports	\$2,500
	<b>TOTAL:</b>	<b>\$30,000</b>

## CONCLUSION

18 Complainant, the Enforcement Division of the Fair Political Practices Commission, and  
19 Respondent, Kieu Hoang, hereby agree as follows:

- 20 1. Respondent violated the Act as described in the foregoing pages, which are a true and accurate  
21 summary of the facts in this matter.
- 22 2. This stipulation will be submitted for consideration by the Fair Political Practices Commission at  
23 its next regularly scheduled meeting – or as soon thereafter as the matter may be heard.
- 24 3. This stipulation resolves all factual and legal issues raised in this matter – for the purpose  
25 of reaching a final disposition without the necessity of holding an administrative hearing to  
26 determine the liability of Respondent pursuant to Section 83116.
- 27 4. Respondent has consulted with its attorney, Robert Blackmon, and understands, and  
28 hereby knowingly and voluntarily waives, any and all procedural rights set forth in Sections

1 83115.5, 11503, 11523, and Regulations 18361.1 through 18361.9. This includes, but is not  
2 limited to the right to appear personally at any administrative hearing held in this matter, to be  
3 represented by an attorney at Respondent’s own expense, to confront and cross-examine all  
4 witnesses testifying at the hearing, to subpoena witnesses to testify at the hearing, to have an  
5 impartial administrative law judge preside over the hearing as a hearing officer, and to have the  
6 matter judicially reviewed.

7 5. Respondent agrees to the issuance of the decision and orders set forth below. Also,  
8 Respondent agrees to the Commission imposing against them an administrative penalty in the  
9 amount of \$30,000. One or more cashier’s checks or money orders totaling said amount – to be  
10 paid to the General Fund of the State of California – is/are submitted with this stipulation as full  
11 payment of the administrative penalty described above, and same shall be held by the State of  
12 California until the Commission issues its decision and order regarding this matter.

13 6. If the Commission refuses to approve this stipulation – then this stipulation shall become  
14 null and void, and within fifteen business days after the Commission meeting at which the  
15 stipulation is rejected, all payments tendered by Respondent in connection with this stipulation  
16 shall be reimbursed to Respondent. If this stipulation is not approved by the Commission, and if  
17 a full evidentiary hearing before the Commission becomes necessary, neither any member of the  
18 Commission, nor the Executive Director, shall be disqualified because of prior consideration of  
19 this stipulation.

20 7. The parties to this agreement may execute their respective signature pages separately. A  
21 copy of any party’s executed signature page, including a hardcopy of a signature page  
22 transmitted via fax or as a PDF email attachment, is as effective and binding as the original.  
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25 Dated: \_\_\_\_\_

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James M. Lindsay, Chief of Enforcement  
Fair Political Practices Commission

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Dated: \_\_\_\_\_  
\_\_\_\_\_ Kieu Hoang

The foregoing stipulation of the parties “In the Matter of Kieu Hoang,” FPPC Case No. 2020-00203, is hereby accepted as the final decision and order of the Fair Political Practices Commission, effective upon execution by the Chair.

IT IS SO ORDERED.

Dated: \_\_\_\_\_  
\_\_\_\_\_ Richard C. Miadich, Chair  
Fair Political Practices Commission