FAIR POLITICAL PRACTICES COMMISSION
428 J Street • Suite 620 • Sacramento, CA 95814-2329
(916) 322-5660 • Fax (916) 322-0886

July 22, 2011

Mr. Jon Rantzman
REDACTED

Re: Warning Letter
FPPC No. 10/744; Jon Rantzman

Dear Mr. Rantzman:

The Fair Political Practices Commission ("FPPC") enforces the provisions of the Political Reform Act ("Act"),[1] found in Government Code Section 81000, and following. This letter is in response to a referral from FPPC's Technical Assistance Division that alleged you violated the Act's disclosure provisions regarding your failure to amend file your statements of Economic Interests ("SEI").

The FPPC has completed its investigation of the facts in this case. Specifically, the FPPC found that you violated the Act's disclosure provisions when, as a former Court Commissioner of the Alameda Superior Court, you failed to amend Schedule A-1 of your 2009 Annual and Leaving Office SEIs.

On Schedule A-1-Investments – Stocks, Bonds and Other Interests, you reported an investment held through Republic Bank and attached brokerage statements. Section 87206 of the Act requires the itemization of each reportable investment held through a brokerage firm/IRA in which you have a $2,000 or more interest. Generally, statements prepared by financial advisors do not contain all the information required under the Act to be disclosed in a format that is comprehensible to members of the public, and they contain extraneous information such as account numbers. Since the SEIs are public documents available for review by the public, account numbers or other types of confidential information should not be included with your SEI. Furthermore, many financial statements do not cover the correct period for reporting on the SEI. The FPPC adopted Schedule A-1 of the SEI as a means to clearly and concisely report investments in which the filer's ownership interest is less than 10 percent. However, you may compile the information required by Schedule A-1 into a format that is substantially similar in lieu of using the schedule.

[1] The Political Reform Act is contained is Government Code sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

Your actions violated the Act because you failed to file the required information as required by the Act. (Gov. Code §87206.) However, since you have left office, and you do not have a history of violating the Act, we are closing this matter with a warning letter. You must immediately file the amendments to your 2009 Annual and Leaving Office SEIs with the FPPC's Technical Assistance Division. The information in this matter will be retained and may be considered should an enforcement action become necessary based on future conduct or newly discovered information. Failure to comply with the provisions of the Act in the future will result in monetary penalties of up to $5,000 for each violation.

A warning letter is an FPPC case resolution without administrative prosecution or fine. However, the warning letter resolution does not provide you with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Fair Political Practices Commission. If you wish to avail yourself of these proceedings by requesting that your case proceed with prosecution rather than a warning, please notify us within ten (10) days from the date of this letter. Upon this notification, the FPPC will rescind this warning letter and proceed with administrative prosecution of this case. If we do not receive such notification, this warning letter will be posted on the FPPC's website ten (10) days from the date of this letter.

The FPPC publishes forms and manuals to facilitate compliance with the provisions of the Act. If you need forms or a manual, or guidance regarding your obligations, please call the FPPC's Technical Assistance Division at 1-866-275-3772. Please also visit our website at www.fppc.ca.gov.

Please feel free to contact Terri Rindahl at (916) 327-2018 with any questions you may have regarding this letter.

Sincerely,

REDACTED

Gary S. Winuk
Chief, Enforcement Division

GSW/tr
cc: Trish Mayer, FPPC's Technical Assistance Division