



NOTICE AND AGENDA Commission Meeting¹

California Fair Political Practices Commission
1102 Q Street, Suite 3050
Sacramento, CA 95811

Thursday, August 21, 2025
10:00 A.M.

Under Government Code section 11123(a), all meetings of a state body are open and public, and all persons are permitted to attend any meeting of a state body, except as otherwise provided in that article. The section further states that the portion of the teleconferenced meeting that is required to be open to the public must be audible to the public at the location specified in the notice of the meeting. Members of the public may listen to the meeting by phone by calling (669) 444-9171; meeting ID 9856036268; or watch the meeting via Webinar at [YouTube](#). To participate in real time, visit <http://mediasite.fppc.ca.gov/> or call (669) 444-9171; meeting ID 9856036268.

To view the new procedure to participate by telephone, visit our [public comment page](#).

Persons who, due to a disability, need assistance in order to participate in this meeting should, prior to the meeting, contact the Commission Assistant at (916) 322-5745 (voice), CommAsst@fppc.ca.gov (e-mail) and ADACoordinator@fppc.ca.gov. TTY/TDD and Speech-to-Speech users may dial 7-1-1 for the California Relay Service to submit comments on an agenda item or to request special accommodations for persons with disabilities.

The Commission may take action on any item listed on this agenda.

Welcome

Adam E. Silver, Chair

¹You can obtain further information about the meeting by contacting the Commission Assistant, 1102 Q Street, Suite 3050, Sacramento, CA, 95811, Tel. (916) 322-5745. Written comments on agenda items should be submitted to the Commission no later than 12:00 p.m. the day before the meeting in order to afford the Commissioners adequate time to fully consider the comments. Email comment letters directly to CommAsst@fppc.ca.gov. To participate in real time, visit <http://mediasite.fppc.ca.gov/>.

The agenda and related documents are posted on the FPPC website at www.fppc.ca.gov. Materials submitted by the public regarding each agenda item will be made available on the website.

Public Comment

1. **Public Comment for Items not on Agenda.** During this comment period, any person is invited to speak on any topic that is not listed on this agenda. Action may not be taken on any matter raised during this public comment period until the matter is specifically listed on a future agenda. Those who wish to comment on an item that has been listed on this agenda may comment when that item has been opened for consideration by the Commission and before any action is taken.

Approval of Commission Minutes

2. **Approval of June 2025 Commission Meeting Minutes**

Consent Calendar 3-4

Items on the consent calendar will be taken up and voted on as a group. A Commissioner may request that an item be removed from consent, in which case it will be discussed separately in the meeting.

Campaign Contribution Limits

3. **In the Matter of Kimberly Ho for City Council 2020 and Kimberly Ho; FPPC No. 21/1068.** Staff: Laura Columbel, Commission Counsel and Ann Flaherty, Special Investigator. Kimberly Ho was a successful candidate for Westminster City Council in the November 3, 2020, General Election and Kimberly Ho for City Council 2020 was Ho's candidate-controlled committee. The Committee and Ho accepted campaign contributions that exceeded contribution limits, in violation of Government Code Section 85301, subdivision (a) and Regulation 18545 (1 count); and failed to timely report certain nonmonetary contributions on one semi-annual campaign statement, in violation of Government Code Section 84211 (1 count). Total Proposed Penalty: \$5,500.

Ho, Stipulation

Default Proceedings Requesting Commission Action

4. **In the Matter of Brown for Bassett School Board Member 2024 and Samuel Brown, FPPC No. 24/1046.** Staff: Theresa Gilbertson, Senior Commission Counsel. Brown was an unsuccessful candidate for the Bassett Unified School District Governing Board in the November 5, 2024 General Election. Brown for Bassett School Board Member 2024 was Brown's candidate-controlled committee. Brown and the Committee failed to timely file two pre-election campaign statements, in violation of Government Code Sections 84200.5, 84200.8, and 84206 (2 counts). **Total Proposed Penalty: \$5,000.**

Brown, Default & Exhibits

General Items 5-10

5. **In re: Winuk Opinion.** Staff: Kevin Cornwall, Senior Commission Counsel. Legal Division staff present for adoption a Commission Opinion concluding that, for purposes of the Political Reform Act's conflict of interest provisions, Palo Alto City Manager Edward Shikada has an economic

interest in Stanford University, a non-profit university, based on its relationship with his spouse's employer, Stanford Health Care, a non-profit organization.

Staff Memo

Draft Commission Opinion

June 2025 Commission Meeting Memorandum

6. **Prenotice Discussion of Proposed Amendments to Regulation 18404, Termination of Filing Requirements, Repeal and Adopt Regulation 18404.1, Terminating Section 82013(a) Committees, and Adopt Regulation 18404.3, Reopening a Terminated Section 82013(a) Committee.** Staff: Karen Harrison, Senior Commission Counsel. Staff proposes the amendments, revised regulation, and new regulation to address new CARS requirements, recent changes to the law regarding the use of campaign funds for security expenses, and to update the reopening procedures. The proposed regulations are presented for pre-notice discussion and feedback, with potential adoption to occur at the October Commission meeting.

Staff Memo

Proposed Amendments to Regulation 18404

Proposed Repeal of Regulation 18404.1

Proposed Adoption of Regulation 18404.1

Proposed Adoption of Regulation 18404.3

7. **Adoption of Proposed Regulation 18430.1 and Amendments to Regulation 18421.3 and 18401, Limitations on Prepaid Cards and Recordkeeping Requirements for Contract Vendors.** Staff: Zachary Norton, Senior Commission Counsel. Staff proposes adoption of Regulation 18430.1 to add prohibitions and limitations on contributions and expenditures using prepaid cards, as well as amendments to Regulation 18421.3 to prohibit candidates or committees from contracting with payment processors that do not utilize more stringent verification measures and Regulation 18401 to add additional recordkeeping requirements relating to contributions received through payment processors. Staff presented this proposal for pre-notice discussion in June and now presents it for adoption.

Staff Memo

Proposed Amendments to Regulation 18401

Proposed Amendments to Regulation 18421.3

Proposed Adoption to Regulation 18430.1

8. **2025-2026 Budget Act.** Staff: Jue Wang, Chief of Administration.

Staff Memo

9. **Legislative Update.** Staff: Lindsey Nakano, Senior FPPC Legislative Counsel. The Commission will review and discuss potential sponsored and other legislation. The Commission may provide direction to staff regarding the same.

Legislative Update

10. Executive Staff Reports.

Enforcement Division. Angela J. Brereton & Christopher B. Burton, Assistant Chiefs.
Audits and Assistance Division. Shrdha Shah, Chief.
Legal Division. Dave Bainbridge, General Counsel.
Administration and Technology Division. Jue Wang, PhD, Chief.
Executive Director Update. Galena West, Executive Director.

Executive Staff Report

Administrative Adjudication

- 11. Administrative Adjudication.** Oral Argument, In the Matter of The City of Norco and Andy Okoro, Respondents. FPPC No. 2018/00789, OAH No. 2024110448. The Commission will hear oral argument from Enforcement Division staff and Respondents. (Regulation 18361.9(b)(6).) The Commission will not hear public comment on this item. (Gov. Code § 11125.7(e) and Regulation 18361.9(b)(7).)

OAH Proposed Decision, May 6, 2025

Complainant's Opening Brief in Opposition of the Proposed Decision

Respondent City of Norco's Brief in Support of the Proposed Decision

Respondent Andy Okoro's Brief in Support of the Proposed Decision

Complainant's Reply Brief in Opposition of the Proposed Decision

Closed Session

- 12. Closed Session. Administrative Adjudication (Gov. Code §§ 11126(c)(3), 11517(c)(2).)**

Consideration of Proposed Decision of Administrative Law Judge, In the Matter of the City of Norco and Andy Okoro. FPPC Case No. 2018/00789, OAH No. 2024110448.

General Item

- 13. Commissioner Comments and Proposed Future Agenda Items.**

Note: Although any Commissioner may identify a topic of interest, the Commission may not substantially discuss or take action on any matter raised during the meeting that is not included on this agenda, except to decide to place the matter on the agenda of a future meeting. (Government Code Sections 11125 & 11125.7(a).)