

4. In the Matter of Ryan Ogulnick; AC 2525 Main, LLC; RHW Holdings, LLC; Beverly Grossman Palmer; and the PAC known as “Californians for Ethical Patient Care, Yes on Tinajero for Mayor and Sarmiento and Reyna for City Council; No on Bacerra for City Council, Santa Ana 2018, Sponsored by 19th Green OC, LLC,”; FPPC No. 18/1194.

Staff: Neal Bucknell, Senior Commission Counsel and George Aradi, Special Investigator. Palmer and the PAC are represented by Amber Maltbie of Nossaman LLP. Ogulnick and the LLC respondents are represented by Gary Winuk of Kaufman Legal Group. Ryan Ogulnick is an Orange County developer and part-owner of the LLC respondents, which are both development companies. Beverly Grossman Palmer is a campaign attorney and partner with the law firm of Strumwasser & Woocher, LLP. Palmer served as the PAC’s treasurer. In this matter, at the request/direction of Ogulnick, the LLC respondents made three contributions to the PAC (totaling \$320,000) in the name of another company—in violation of Government Code Section 84301 (3 counts). Also, Ogulnick, the LLC respondents, and the PAC caused misleading and inaccurate reporting on a 24-Hour Report regarding the true sources of contributions to the PAC (totaling \$170,000), in violation of Government Code Section 84203 (1 count). With respect to a semi-annual statement that was filed for the period ending December 31, 2018, Ogulnick, Palmer, the PAC, and both LLC respondents failed to comply with various campaign reporting requirements, in violation of Government Code Sections 84211, subdivisions (f), (k); and 84303 (1 count). Palmer and the PAC failed to file required 24-Hour Reports with respect to the PAC’s advertisements—in violation of Government Code Section 84204 (3 counts). Additionally, Ogulnick, the PAC, and the LLC respondents provided misleading and inaccurate top contributor disclosures for PAC advertisements (during the last week leading up to the election), in violation of Government Code Sections 84503, 84504.1 and 84504.3 (1 count). **Total Proposed Penalty \$87,000.**

Ogulnick – Stip

Comment Letter, Dave Helvig

2. **Maddoxcebj1984** says:

February 27, 2025 at 3:39 pm

Well I wasn't notify about the people staying are so I stand stay taking the financial up on the offer that are mean fully financial mean that my money is paying for the transaction. so you are talking to someone who you want to do business with I take Because if In under the wrong impression please stop financial r the money that that you n receive for the people who take them for,m Me You are not robing me so please stop telling people that you are robbing me It would in to insure and they will investigate the situation and it some that the chance of word can avoid and the ten can go by so the real money can be made so please let the be wonderful transaction and Both

party can walk away with a good sign in faith for this can you please contact me at 323-371-9486 it's been a great time talking to you please have a wonderful day

I want that shot for the 3rd year please

1. **Robert Smart** says:

February 13, 2025 at 10:05 am

As a resident of the neighborhood where Ryan Ogulnick was attempting to buy the city council's vote to approve his development project, Ryan should be forced to pay the maximum penalty allowed. His illegal actions caused the neighborhood undue waste of time and money to opposed the development, when all along he had some the city council members allready in his pocket. His development was approved, and it wasn't until the neighborhood filed a referrendum that the development was finally denied.