



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
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# EXECUTIVE STAFF REPORTS

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*December 17, 2020 Commission Hearing*

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# I. ENFORCEMENT DIVISION

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STAFF: ANGELA BRERETON, CHIEF OF ENFORCEMENT

## I. Overview

During the period of November 1, 2020 through November 30, 2020 the Enforcement Division received 95 complaints, opened 27 for investigation, and rejected 24. The Enforcement Division received 110 referrals during this time. The Enforcement Division closed a total of 59 cases including:

- 17 warning letters – advertisement violations (7), campaign violations (7), and statement of economic interests violations (3);
- 25 no action closure letters alleging – advertisement violations (2), behested payment violations (1), campaign violations (9), conflict of interest violations (1), and statement of economic interests violations (12);
- 16 approved stipulations from the October and November Commission meetings; and
- 1 default from the January Commission meeting.

The Division had 1,365 cases in various stages of resolution at the time of the November Monthly Report and currently has approximately 1,421 cases in various stages of resolution, including the 8 cases before the Commission as listed in the December Agenda.

## II. Annual Statistics

On the next page, you will find a chart that details the annual statistics for enforcement complaints, referrals and cases. This chart includes the data from 2019, where Enforcement had a highly efficient and effective year, receiving almost 2,700 complaints and referrals and closing 1,031 cases with violations found. The information in the chart has been gathered from public reports, information from the defunct and inactive database, and data that has been converted into current form, so the numbers are close estimates in some instances.

	<b>Year</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
1	Complaints Received	1,180	564	1,352	744
2	Referrals Received	350	1,616	1,529	1,950
3	Total Complaint and Referrals Received	1,530	2,180	2,881	2,694
4	Cases opened	1,315	1,480	1,561	1,820
5	Cases closed <sup>3</sup>	1,803	1,477	1,243	1,465
6	Cases with resolutions approved by the Commission <sup>1</sup>	311	340	235	343
	a Streamline cases approved by Commission	234	262	173	263
	b Mainline cases approved by Commission	70	66	56	73
	c Default cases approved by Commission	7	12	6	7
7	Total fines imposed by the Commission	\$894,257	\$1,126,933	\$499,606	\$797,384
8	Warning letters issued	489	505	554	584
9	Administrative terminations	668	297	177	104
10	Cases closed with violations found <sup>2</sup>	1,468	1,142	966	1,031
11	Advisory letters issued	14	17	20	9
12	No action closure letters	321	318	252	423

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<sup>1</sup> Total for lines 6a, 6b, and 6c.

<sup>2</sup> Total for lines 6, 8, and 9.

<sup>3</sup> Total cases closed includes Commission approved cases from the previous year and a Commission approved administrative judgement. It does not include Commission approved cases not yet closed.

### III. Unexecuted Streamline Stipulations

Streamline penalty stipulations are approved by the Chief of Enforcement and reported to the Commission for discussion only before they are executed. The following streamline stipulations are presented for that purpose. After the close of the hearing, the Chief of Enforcement may execute all or any of the streamline penalty stipulations, at her discretion per Regulation 18360.2.

#### Recordkeeping

**[In the Matter of Marijuana Policy Project of California, Yes on 64 and Lindsay Robinson; FPPC No. 19/1583.](#)** Staff: Angela Brereton, Chief of Enforcement and Dominika Wojenska, Associate Governmental Program Analyst. This matter arose from an audit performed by the Franchise Tax Board's Political Reform Audit Program. Marijuana Policy Project of California, Yes on 64 was a state primarily formed committee. Lindsay Robinson was the Committee's treasurer. The Committee and Robinson failed to maintain adequate campaign records for contributions received, in violation of Government Code Section 84104 (1 count). **Total Proposed Penalty: \$200.**

#### Campaign Late Filer

**[In the Matter of No on Prop 66, Californians for Fair Justice, sponsored by social justice organizations, and Lisa Le; FPPC No. 19/572.](#)** Staff: Angela Brereton, Chief of Enforcement and Dominika Wojenska, Associate Governmental Program Analyst. This matter arose from an audit performed by the Franchise Tax Board's Political Reform Audit Program. No on Prop 66, Californians for Fair Justice, sponsored by social justice organizations is a state primarily formed committee. Lisa Le is the Committee's treasurer. The Committee and Le failed to timely file four 10-Day Reports, in violation of Government Code Section 85309 (4 counts) and failed to timely file two 24-Hour Reports, in violation of Government Code Sections 85309 and 84203 (2 counts). **Total Proposed Penalty: \$4,083.**

**[In the Matter of Coastal Bluff Conservancy and Carla Echols-Hayes; FPPC No. 20/944.](#)**

Staff: Angela Brereton, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. Coastal Bluff Conservancy is a local general purpose committee that was active during the November 3, 2020 General Election. Carla Echols-Hayes is the Committee's treasurer. The Committee and Echols-Hayes failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count). **Total Proposed Penalty: \$238.**

#### Lobbying

**[In the Matter of CBRE; FPPC No. 20/432.](#)** Staff: Angela Brereton, Chief of Enforcement and Tara Stock, Intake Manager. CBRE, a lobbyist employer, failed to timely file two lobbyist employer reports, in violation of Government Code Section 86117 (2 counts). **Total Proposed Penalty: \$895.**

**Statement of Economic Interests Late Filer**

**In the Matter of Jeffrey Alderman; FPPC No. 17/478.** Staff: Jenna C. Rinehart, Commission Counsel and George Aradi, Special Investigator. Jeffrey Alderman, a member of the Board of Directors for Cottonwood Fire Protection District, failed to timely file an Assuming Office and a 2015, 2016, 2017, and 2018 Annual Statement of Economic Interest, in violation of Government Code Sections 87300 and 87302 (5 counts). **Total Proposed Penalty: \$1,000.**

**In the Matter of Ivor Van Wingerden; FPPC No. 19/1318.** Staff: Angela Brereton, Chief of Enforcement and Amber Burnside, Assistant Political Reform Consultant. Ivor Van Wingerden, an alternate member of the California Cut Flower Commission, failed to timely file a 2018 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Proposed Penalty: \$400.**

## II. LEGAL DIVISION

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### A. Pending Litigation

*California State Association of Counties and California School Boards Association v. FPPC*  
County of Los Angeles Superior Court, Central District  
Case No. BS174653

On September 11, 2018, petitioners served a first amended petition for writ of mandate and complaint for declaratory relief. Petitioners allege that Regulations 18420.1 and 18901.1 are invalid as a matter of law, that the Commission has exceeded its jurisdiction in adopting these Regulations, and that the Regulations are unenforceable.

On March 29, 2019, the Commission's Motion for Judgment on the Pleadings was granted with leave to amend. The court vacated all hearing dates and set a new trial setting conference. Plaintiffs timely filed a second amended complaint on June 27, 2019.

The Commission filed a demurrer and the hearing occurred on November 22, 2019. In its ruling, the court: (1) sustained the demurrer to the first cause of action without leave to amend; (2) sustained the demurrer with leave to amend on plaintiff CSBA's standing on all cause of action and plaintiff CSAC's standing on all causes of actions challenging Regulation 18901.1; and (3) overruled the remaining grounds for demurrer.

Plaintiffs filed a third amended complaint, and the Commission has filed an answer. The trial originally set for November 6, 2020, was rescheduled for **December 4, 2020**. The Court had not issued a decision as of the time of this report.

*Mat Wahlstrom v. California Fair Political Practices Commission and Steven J. Kaufman*  
San Diego County Superior Court, Central Division  
Case No. 37-2020-00030654-CU-WM-CTL

Petitioner filed a petition for writ of mandate on August 31, 2020. The petition seeks to set aside a streamline stipulation, decision and order against Todd Gloria adopted by the Commission in November 2019. The Attorney General is representing the Commission. The Commission filed an answer to the complaint on October 22, 2020.

### B. Outreach and Training

#### *Webinars*

- On November 17<sup>th</sup>, the FPPC hosted a Statement of Economic Interests Filing Officer webinar. Political Reform Consultant, Adam Ramirez, and Staff Services Manager, Alana Jeydel, were the presenters. 65 people attended.

- On November 18<sup>th</sup>, Senior Commission Counsel, Erika Boyd and Political Reform Consultant, Katie Trumbly, hosted a Conflict of Interest, Section 1090, and Statement of Economic Interest Filers Training via webinar for the Department of Toxic Substance Control. 161 officials attended the webinar.
- On November 19<sup>th</sup>, the FPPC hosted a Statement of Economic Interest Filers webinar. Political Reform Consultants, Katie Trumbly and Stephen Hernandez presented. 25 people attended.

#### *Scheduled Webinars*

- December 8<sup>th</sup>, the FPPC is hosting a Statement of Economic Interest Filers webinar.
- December 10<sup>th</sup>, the FPPC is hosting a Statement of Economic Interests Filing Officer webinar.
- December 16<sup>th</sup> or 17<sup>th</sup>, the FPPC is conducting a Candidate/Treasurer webinar for the League of Cities Inland Empire Chapter.
- December 18<sup>th</sup>, Staff Services Manager, Alana Jeydel, will be presenting on new laws and regulations at the City Clerks Annual Conference.
- January 6<sup>th</sup>, the FPPC is hosting a Candidate/Treasurer webinar.
- Jan 12<sup>th</sup>, the FPPC is hosting a Statement of Economic Interest Filers webinar.
- Jan 14<sup>th</sup>, the FPPC is hosting a Statement of Economic Interests Filing Officer webinar.
- January 26<sup>th</sup>, the FPPC is conducting an SEI Filer webinar for the Port of San Diego

#### *Video Tutorials*

- Commission video tutorials were accessed a total of 247 times in November. Form 700 videos were accessed 154 times, the Candidate/Treasurer video was accessed 48 times, and the filing officer videos were accessed 45 times.

### **C. Advice**

The November 2020, Advice Letter Report is available at <http://fppc.ca.gov/content/dam/fppc/NS-Documents/LegalDiv/advice-letter-reports/2020/Advice%20Letter%20Report%20November%202020.pdf>

In November, the Legal Division responded to the following requests for advice:

- **Education Program:** The Education Program responded to 348 requests for technical assistance via phone.
- **Requests for Advice:** The Email Advice and Conflict of Interest Code Program and Legal Division attorneys collectively responded to more than 557 e-mail and telephone requests for advice, 75 of which were not responded to within 24 hours.
- **Advice Letters:** The Legal Division received 11 advice letter requests under the Political Reform Act and completed nine.
- **Section 1090 Letters:** The Legal Division received six advice letter request concerning Section 1090 and completed six. This year to date, we have received 41 advice requests regarding Section 1090.

#### **D. Miscellaneous Decisions**

None to report.

#### **E. Potential Upcoming Regulations**

*January 21<sup>st</sup>, 2021*

- **Cal-Access Replacement System (CARS).** (Regulations 18402.1, 18406, 18410, 18422.5, 18465, 18465.1, 18601, 18611, 18616, and 18616.4.) The Secretary of State's new electronic campaign and lobbyist reporting system, CARS, is scheduled to begin operating in February 2021. Numerous minor updates to existing regulations will be required as a result of CARS and its implementing legislation. (Prenotice Discussion.)
- **Streamline and Warning Letter Programs.** (Regulations 18360.1, 18360.2, and 18360.3.) Proposed expansion and adjustment to the Commission's Streamline Settlement and Warning Letter Programs in response to the Commission's request to review the programs after initial implementation over a year ago. (Adoption.)

*February 18<sup>th</sup>, 2021*

- **Local Contribution Limits.** (Amending Regulations 18404.1, 18421.4, 18421.8, 18521, 18521.5, 18523.1, 18530.2, 18530.8, 18531.2, 18531.5, 18531.61, 18535, 18536, 18537.1, 18545, and 18951; and adopting new regulations.) Update existing regulations and adopt new regulations in response to Assembly Bill 571 (2019), which imposes campaign contribution limits on county and city elected offices if a jurisdiction has not adopted its own limit. The legislation also authorizes the Commission to enforce local contribution limits imposed by state law. (Prenotice Discussion.)



March 18<sup>th</sup>, 2021

- Permissible campaign Expenditures. (New regulation.) Provide guidance on whether an expenditure of campaign funds has a sufficient political, legislative, or governmental purpose under Article 4 of the Act. Provisions may include specific items previously addressed through the advice or opinion process, and/or generally applicable guidelines. (Prenotice Discussion.)
- Cal-Access Replacement System (CARS). (Regulations 18402.1, 18406, 18410, 18422.5, 18465, 18465.1, 18601, 18611, 18616, and 18616.4.) The Secretary of State's new electronic campaign and lobbyist reporting system, CARS, is scheduled to begin operating in February 2021. Numerous minor updates to existing regulations will be required as a result of CARS and its implementing legislation. (Adoption.)

## F. Conflict of Interest Codes

### Adoptions and Amendments

#### *State Agency Conflict of Interest Codes*

- California Earthquake Authority
- Department of Managed Healthcare
- Workforce Development Board

#### *Multi-County Agency Conflict of Interest Codes*

- Calleguas-Las Virgenes Public Financing Authority
- Fenner Valley Water Authority
- Los Angeles San Diego San Luis Obispo Rail Corridor Agency
- Methods Schools

### Exemptions

- None to report.

### Extensions

- None to report.

## G. Probable Cause Hearings

*Please note, a finding of probable cause does not constitute a finding that a violation has occurred. The respondents are presumed to be innocent of any violation of the Act unless a violation is proven in a subsequent proceeding.*

*The following matters were decided based solely on the papers. The respondents did not request a probable cause hearing.*

1. ***In the Matter of Kayla Jones for Seaside City Council 2016, Kayla Jones, and Ryan Gibson, Case No. 18/1090.*** On November 17, 2020, probable cause was found to believe Respondents committed the following violations of the Act:

- Count 1: The Committee, Jones, and Gibson failed to timely file the semi-annual campaign statement for the reporting period of July 1, 2017 through December 31, 2017, due on January 31, 2018, in violation of Government Code Section 84200.
- Count 2: The Committee, Jones, and Gibson failed to timely file the pre-election campaign statement for the reporting period of July 1, 2018 through September 22, 2018, due on September 27, 2018, in violation of Government Code Sections 84200.5, subdivision (a), and 84200.8, subdivision (a).
- Count 3: The Committee, Jones, and Gibson failed to timely file the pre-election campaign statement for the reporting period of September 23, 2018 through October 20, 2018, due on October 25, 2018, in violation of Government Code Sections 84200.5, subdivision (a), and 84200.8, subdivision (b).
- Count 4: The Committee, Jones, and Gibson failed to timely file the semi-annual campaign statement for the reporting period of October 21, 2018 through December 31, 2018, due on January 31, 2019, in violation of Government Code Section 84200.
- Count 5: The Committee, Jones, and Gibson failed to timely file the semi-annual campaign statement for the reporting period of January 1, 2019 through June 30, 2019, due on July 31, 2019, in violation of Government Code Section 84200.
- Count 6: The Committee, Jones, and Gibson failed to timely file the semi-annual campaign statement for the reporting period of July 1, 2019 through December 31, 2019, due on January 31, 2020, in violation of Government Code Section 84200.
- Count 7: The Committee, Jones, and Gibson failed to report eight contributions received from January 17, 2017 through September 14, 2018, totaling \$2,800, and reported nine contributions received from July 22, 2018 through October 18, 2018, totaling \$4,071.00, that were not deposited into the Committee's campaign bank account, in violation of Government Code Section 84211, subdivision (f).
- Count 8: The Committee, Jones, and Gibson failed to report a \$175 expenditure made on October 17, 2018 and reported four expenditures made from September 23, 2018 through October 20, 2018, totaling \$4,798.69, that were not made from the Committee's campaign bank account, in violation of Government Code Section 84211, subdivision (k).

Count 9: The Committee, Jones, and Gibson made a cash expenditure of \$175 on October 17, 2017, in violation of Government Code Section 84300, subdivision (b).

Count 10: The Committee, Jones, and Gibson failed to open a separate controlled committee and separate campaign bank account in connection with Jones's 2018 campaign for Mayor of Seaside, on or by March 26, 2018, in violation of Government Code Sections 84101 and 85201 and Regulation 18521.

Count 11: The Committee, Jones, and Gibson failed to timely file a 24-hour contribution report for a \$1,000 contribution received on September 4, 2018 by September 5, 2018, in violation of Government Code Section 84203.

Count 12: The Committee, Jones, and Gibson failed to promptly pay the \$2,000 anonymous contribution they received on September 10, 2018 to SOS, in violation of Government Code Section 84304.

Count 13: The Committee, Jones, and Gibson failed to maintain adequate campaign records since January 1, 2017, in violation of Government Code Section 84104 and Regulation 18401.

Count 14: The Committee, Jones, and Gibson failed to pay the 2018 annual fee to SOS by January 15, 2018, and failed to pay the resulting \$150 late penalty, in violation of Section 84101.5, subdivisions (c) and (d).

Count 15: The Committee, Jones, and Gibson failed to pay the 2019 annual fee to SOS by January 15, 2019, and failed to pay the resulting \$150 late penalty, in violation of Section 84101.5, subdivisions (c) and (d).

Count 16: The Committee, Jones, and Gibson failed to pay the 2020 annual fee to SOS by January 15, 2020, and failed to pay the resulting \$150 late penalty, in violation of Section 84101.5, subdivisions (c) and (d).

2. ***In the Matter of Taxpayers for Good Government Pac (Sponsored by Taxpayers for Good Government 501c4) and Robert Johnson, Case No. 16/473.*** On November 18, 2020, probable cause was found to believe Respondents committed the following violations of the Act:

Count 1: On or about May 16, 2016, the Committee and Johnson failed to timely file an amended statement of organization to report the Committee's date of qualification, in violation of Government Code Section and 84103.

Count 2: The Committee and Johnson failed to timely file the second pre-election campaign statement for the reporting period of January 1, 2016 to May 21, 2016, by the May 26, 2016 due date, in violation of Government Code Sections 84200.5 and 84200.8.

- Count 3: The Committee and Johnson failed to timely file a semi-annual campaign statement for the reporting period of May 22, 2016 to June 30, 2016, by the August 1, 2016 due date, in violation of Government Code Section 84200.
- Count 4: The Committee and Johnson failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2016 to December 31, 2016, by the January 31, 2017 due date, in violation of Government Code Section 84200.
- Count 5: The Committee and Johnson failed to timely file a 24-hour independent expenditure report for a late independent expenditure to support Michael Tubbs, totaling \$2,353.12, by the May 17, 2016 due date, in violation of Government Code Section 84204.
- Count 6: The Committee and Johnson failed to timely file a 24-hour independent expenditure report for a late independent expenditure to support Dan Wright, totaling \$2,353.12, by the May 17, 2016 due date, in violation of Government Code Section 84204.
- Count 7: The Committee and Johnson failed to timely file a 24-hour independent expenditure report for a late independent expenditure to support Susan Lenz, totaling \$2,353.12, by the May 17, 2016 due date, in violation of Government Code Section 84204.
- Count 8: The Committee and Johnson failed to timely file a 24-hour independent expenditure report for a late independent expenditure to support Jesus Andrade, totaling \$2,353.12, by the May 17, 2016 due date, in violation of Government Code Section 84204.
- Count 9: The Committee and Johnson failed to timely file a 24-hour independent expenditure report for a late independent expenditure to support Elbert Holman, totaling \$2,353.12, by the May 17, 2016 due date, in violation of Government Code Section 84204.
- Count 10: The Committee and Johnson failed to timely file a 24-hour independent expenditure report for a late independent expenditure to support Gustavo Medina, totaling \$2,353.12, by the May 17, 2016 due date, in violation of Government Code Section 84204.
- Count 11: The Committee and Johnson failed to timely file a 24-hour independent expenditure report for a late independent expenditure to support Michael Tubbs, totaling \$2,511, by the October 28, 2016 due date, in violation of Government Code Section 84204.
- Count 12: The Committee and Johnson failed to timely file a 24-hour independent expenditure report for a late independent expenditure to support Dan Wright, totaling \$2,511, by the October 28, 2016 due date, in violation of Government Code Section 84204.
- Count 13: The Committee and Johnson failed to timely file a 24-hour independent expenditure report for a late independent expenditure to support Susan Lenz, totaling \$2,511, by the October 28, 2016 due date, in violation of Government Code Section 84204.

- Count 14: The Committee and Johnson failed to timely file a 24-hour independent expenditure report for a late independent expenditure to support Jesus Andrade, totaling \$2,511, by the October 28, 2016 due date, in violation of Government Code Section 84204.
- Count 15: The Committee and Johnson failed to timely file a 24-hour independent expenditure report for a late independent expenditure to oppose Anthony Silva, totaling \$4,065.33, by the October 28, 2016 due date, in violation of Government Code Section 84204.
- Count 16: The Committee and Johnson failed to timely file a 24-hour independent expenditure report for a late independent expenditure to oppose Sam Fant, totaling \$4,065.33, by the October 28, 2016 due date, in violation of Government Code Section 84204.
- Count 17: The Committee and Johnson failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2017 to June 30, 2017, by the July 31, 2017 due date, in violation of Government Code Section 84200.
- Count 18: The Committee and Johnson failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2017 to December 31, 2017, by the January 31, 2018 due date, in violation of Government Code Section 84200.
- Count 19: The Committee and Johnson failed to timely file the second pre-election campaign statement for the reporting period of January 1, 2018 to May 19, 2018, by the May 24, 2018 due date, in violation of Government Code Sections 84200.5 and 84200.8.
- Count 20: The Committee and Johnson failed to timely file a semi-annual campaign statement for the reporting period of May 20, 2018 to June 30, 2018, by the July 31, 2018 due date, in violation of Government Code Section 84200.
- Count 21: The Committee and Johnson failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2018 to December 31, 2018, by the January 31, 2019 due date, in violation of Government Code Section 84200.
- Count 22: The Committee and Johnson failed to timely file a 24-hour independent expenditure report for a late independent expenditure to oppose Andrea Macon, totaling \$1,934.74, by the May 23, 2018 due date, in violation of Government Code Section 84204.
- Count 23: The Committee and Johnson failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2019 to June 30, 2019, by the July 31, 2019 due date, in violation of Government Code Section 84200.
- Count 24: The Committee and Johnson failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2019 to December 31, 2019, by the January 31, 2020 due date, in violation of Government Code Section 84200.

- Count 25: The Committee and Johnson failed to include the proper disclosure on advertisements to oppose one candidate appearing on the June 5, 2018 Primary Election ballot, distributed on or around November 10, 2016, in violation of Government Code Section 84506 and Regulation 18450.4, subdivision (b)(1).
- Count 26: The Committee and Johnson failed to include the proper disclosure on a mass mailing to support certain candidates appearing on the June 7, 2016 Primary Election ballot, distributed on or around May 16, 2016, in violation of Government Code Section 84305 and Regulation 18402, subdivision (c).
- Count 27: The Committee and Johnson failed to include the proper disclosure on a mass mailing to support certain candidates appearing on the November 8, 2016 General Election ballot, distributed on or around October 27, 2016, in violation of Government Code Section 84305 and Regulation 18402, subdivision (c).
- Count 28: The Committee and Johnson failed to include the proper disclosure on a mass mailing to oppose certain candidates appearing on the November 8, 2016 General Election ballot, distributed on or around October 27, 2016, in violation of Government Code Section 84305 and Regulation 18402, subdivision (c).
- Count 29: The Committee and Johnson failed to include the proper disclosure on a mass mailing to support certain candidates appearing on the June 5, 2018 Primary Election ballot, distributed on or around May 16, 2018, in violation of Government Code Section 84305 and Regulation 18402, subdivision (c).
- Count 30: The Committee and Johnson failed to include the proper disclosure on a mass mailing to oppose one candidate appearing on the June 5, 2018 Primary Election ballot, distributed on or around May 22, 2018, in violation of Government Code Section 84305 and Regulation 18402, subdivision (c).
- Count 31: The Committee and Johnson failed to pay the SOS 2018 annual fee by January 15, 2018, and failed to pay the resulting \$150 late penalty, in violation of Government Code Section 84101.5.
- Count 32: The Committee and Johnson failed to pay the SOS 2019 annual fee by January 15, 2019, and failed to pay the resulting \$150 late penalty, in violation of Government Code Section 84101.5.
- Count 33: The Committee and Johnson failed to pay the SOS 2020 annual fee by January 15, 2020, and failed to pay the resulting \$150 late penalty, in violation of Government Code Section 84101.5.

3. ***In the Matter of Lemeika Horton-Pope, Case No. 2019-00250.*** On November 25, 2020, probable cause was found to believe Respondent committed the following violations of the Act:

Count 1: Horton-Pope failed to timely file a 2017 Annual SEI by April 2, 2018, in violation of Government Code section 87203.

Count 2: Horton-Pope failed to timely file a Leaving Office SEI by October 9, 2018, in violation of Government Code section 87204.

4. ***In the Matter of Campaign to Elect Carissa Purnell for Salinas Valley Memorial Hospital Board 2016 District 2, and Carissa Purnell, Case No. 2018-00624.*** On December 1, 2020, probable cause was found to believe Respondents committed the following violations of the Act:

Count 1: The Committee and Purnell failed to timely file the pre-election statement for the period of January 1, 2016 through October 22, 2016 by the deadline of October 27, 2016, in violation of Government Code sections 84200.5 and 84200.8.

Count 2: The Committee and Purnell failed to timely file the semi-annual campaign statement for the reporting period of October 23, 2016 through December 31, 2016, due January 31, 2017, in violation of Government Code section 84200.

Count 3: The Committee and Purnell failed to timely file the semi-annual campaign statement for the reporting period of January 1, 2017 through June 30, 2017, due July 31, 2017, in violation of Government Code section 84200.

Count 4: The Committee and Purnell failed to timely file the semi-annual campaign statement for the reporting period of July 1, 2017 through December 31, 2017, due January 31, 2018, in violation of Government Code section 84200.

Count 5: The Committee and Purnell failed to timely file the semi-annual campaign statement for the reporting period of January 1, 2018 through June 30, 2018, due July 31, 2018, in violation of Government Code section 84200.

Count 6: The Committee and Purnell failed to timely file the semi-annual campaign statement for the reporting period of July 1, 2018 through December 31, 2018, due January 31, 2019, in violation of Government Code section 84200.

Count 7: The Committee and Purnell failed to timely file the semi-annual campaign statement for the reporting period of January 1, 2019 through June 30, 2019, due July 31, 2019, in violation of Government Code section 84200.

Count 8: The Committee and Purnell failed to timely file the semi-annual campaign statement for the reporting period of July 1, 2019 through December 31, 2019, due January 31, 2020, in violation of Government Code section 84200.

## III. ADMINISTRATION & TECHNOLOGY DIVISION

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STAFF: LORESSA HON, CHIEF OF ADMINISTRATION

### **New Employee Report**

#### **Administration Division**

Alyssa Davis, Reception (Office Technician)

### **Statement of Economic Interest (Form 700)**

As of December 4, 2020, there were 226 Form 700 non-filers. The Statement of Economic Interest Unit has made 155 non-filer referrals to the Enforcement Division.