



EXECUTIVE STAFF REPORTS

May 19, 2022 Commission Hearing

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I. ENFORCEMENT DIVISION

STAFF: ANGELA BRERETON, CHIEF

A. Overview

During the period of April 1, 2022 through April 30, 2022 the Enforcement Division received 97 complaints, opened 12 for investigation, and rejected 21. The Enforcement Division received 56 referrals during this time. The Enforcement Division closed a total of 61 cases including:

- 36 warning letters – advertisement violations (2), campaign violations (11), conflict of interest code violations (6), lobbying violations (1), statement of economic interests violations (16);
- 13 no action closure letters alleging – advertisement violation (1), campaign violations (5), conflict of interest (1) conflict of interest code violation (1), and statement of economic interests violations (5);
- 12 approved stipulations from the February, March, and April Commission meetings;

The Division had 1,479 cases in various stages of resolution at the time of the April Monthly Report and currently has approximately 1,477 cases in various stages of resolution, including the 16 cases before the Commission as listed in the May Agenda.

B. 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 2021, in which the Enforcement Division had a 16% increase in Streamline Penalties compared to 2020 after the Commission updated the Streamline Program regulations with the goal of making the Streamline Program more inclusive. 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.

	Year	2017	2018	2019	2020	2021
1	Complaints Received	564	1,352	744	1,390	606
2	Referrals Received	1,616	1,529	1,950	1,518	1,751
3	Total Complaint and Referrals Received	2,180	2,881	2,694	2,908	2,357
4	Cases opened	1,480	1,561	1,820	1,155	1,185
5	Cases closed ³	1,477	1,243	1,465	1,526	1,058
6	Cases with penalties ¹	340	235	343	278	269
	a Streamline cases	262	173	263	194	234
	b Mainline cases	66	56	73	77	32
	c Default cases	12	6	7	7	3
7	Total fines imposed	\$1,126,933	\$499,606	\$797,384	\$1,940,107	\$472,248
8	Warning letters issued	505	554	584	777	475
9	Administrative terminations	297	177	104	62	59
10	Cases closed with violations found ²	1,142	966	1,031	1,117	803
1	Advisory letters issued	17	20	9	7	16
12	No action closure letters	318	252	423	402	237

¹ Total for lines 6a, 6b, and 6c.

² Total for lines 6, 8, and 9.

³ Total cases closed includes Commission approved cases from the previous year and Commission approved administrative judgements. It does not include Commission approved cases not yet closed.

C. Prior Year's Workload – 2022 Quarterly Summary

Jan-22		Apr-22	
Year Opened	Existing Case Workload	Year Opened	Existing Case Workload
2015	1	2015	0
2016	12	2016	10
2017	28	2017	19
2018	195	2018	174
2019	287	2019	268
2020	381	2020	361
2021	561	2021	476

D. 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 the Chief's discretion per Regulation 18360.2.

Since the last Monthly Report, the Enforcement Chief has not used discretion to increase the penalties for Tier Two advertising violations resulting in public confusion, under Regulation 18360.3(d)(7)(B)(i)(b), or to increase the penalties for Tier Two violations involving the same candidate, committee, or principal officer who has paid a Tier One penalty to the Commission or received a Warning Letter from the Commission for the same type of violation occurring within the last five years, based on the resulting public harm.

The Enforcement Chief used discretion under Regulation 18360.2 to exclude violations in the following streamline cases presented with this report: In the Matter of Michael Dalla; FPPC No. 20/1022 [the committee raised and spent less than \$10,000].

Advertisements

[In the Matter of Michael Dalla; FPPC No. 20/1022.](#) Staff: Alex Rose, Commission Counsel. Michael Dalla is an independent expenditure committee. The independent expenditure committee failed to timely file a 24-Hour Report, in violation of Government Code Section 84204 (1 count), and failed to include the proper advertising disclosures on a mailer distributed prior to the November 3, 2020 General Election, in violation of Government Code Section 84506.5 (1 count). **Total Penalty: \$917 (Tier Two).**

[In the Matter of Sunita Verma for Saratoga Union School District Board 2020, and Sunita Verma; FPPC Case No. 21/354.](#) Staff: Jenna C. Rinehart, Commission Counsel, and Jay Gehres, Special Investigator. Sunita Verma was an unsuccessful candidate for Board Member of the Saratoga Union School District in the November 3, 2020 General Election. Sunita Verma for Saratoga Union School District Board 2020 was Verma's candidate-controlled committee. The

Committee failed to include the Committee's full name, street address, and "Paid for by" language on a mass mailing sent prior to the election, in violation of Government Code Section 84305 (1 count). **Total Penalty: \$430 (Tier Two).**

Lobbying Reporting

In the Matter of OhmConnect, Inc.; FPPC No. 21/1031. Staff: Angela Brereton, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. Emily Andrews & Karen Getman of Olson Remcho LLP represented OhmConnect Inc. in this matter. OhmConnect, Inc., a \$5,000 filer and lobbyist employer, failed to timely file twelve \$5,000 filer quarterly reports and four lobbyist employer quarterly reports, in violation of Government Code Section 86115 (16 counts). **Total Penalty: \$14,877 (Tier Two).**

In the Matter of Staton Strategies, LLC, and Clifford A. Staton; FPPC No. 21/1032. Staff: Angela Brereton, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. Emily Andrews & Karen Getman of Olson Remcho LLP represented Staton Strategies, LLC and Clifford A. Staton in this matter. Staton Strategies, LLC, a lobbying firm, failed to timely file three lobbying firm quarterly reports, and Clifford A. Staton, a lobbyist, failed to file three quarterly lobbyist reports, in violation of Government Code Sections 86114 and 86113 (6 counts). **Total Penalty: \$3,850 (Tier Two).**

Campaign Late Filer

In the Matter of Friends of Baldwin Park Schools Yes on Measure AE, and Nancy Leon; FPPC Case No. 19/594. Staff: Jenna C. Rinehart, Commission Counsel. Friends of Baldwin Park Schools Yes on Measure AE was a local ballot measure committee primarily formed to support the approval of Measure AE, a bond issue measure on the November 6, 2018 General Election ballot. Nancy Leon served as the Committee's treasurer. The Committee failed to timely file a semi-annual campaign statement and two 24-hour contribution reports, in violation of Government Code Sections 84200 and 84203 (3 counts). **Total Penalty: \$2,140 (Tier Two).**

In the Matter of Mark D. Melville for San Mateo County Sheriff 2018, Mark Melville, Sari Ditlevsen, and Rosie McNeilly; FPPC Case No. 19/1725. Staff: Jenna C. Rinehart, Commission Counsel. Mark Melville was an unsuccessful candidate for San Mateo County Sheriff in the June 5, 2018 Primary Election. Mark D. Melville for San Mateo County Sheriff 2018 was Melville's candidate-controlled committee. Sari Ditlevsen served as the Committee's treasurer from establishment to March 7, 2018. Rosie McNeilly served as the Committee's treasurer from March 8, 2018 to termination. The Committee failed to timely report certain contributions received and expenditures made on one pre-election campaign statement and two semi-annual campaign statements, in violation of Government Code Section 84211 (3 counts). **Total Penalty: \$638 (Tier One).**

In the Matter of Alhambra Teachers Association PAC and Karen Jacobson; FPPC No. 20/1114. Staff: Angela Brereton, Chief of Enforcement and Amber Rodriguez, Political Reform Consultant. Alhambra Teachers Association PAC is a local general purpose committee. Karen

Jacobson is the Committee's treasurer. The Committee and Jacobson failed to timely file one pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count). **Total Penalty: \$578 (Tier Two).**

[In the Matter of National Women's Political Caucus San Gabriel Valley, and Joanne Wendler; FPPC No. 21/087.](#) Staff: Angela Brereton, Chief of Enforcement and Tara Stock, Intake Manager. National Women's Political Caucus San Gabriel Valley is a local general purpose committee. Joanne Wendler was the committee's Treasurer. The Committee and Wendler failed to timely file two semi-annual campaign statements, in violation of Government Code Section 84200 (2 counts). **Total Penalty: \$442 (Tier One).**

[In the Matter of Friends of Ty Humes for San Dieguito UHSD Trustee Area 5 2021, and Ty Humes; FPPC No. 21/1009.](#) Staff: Angela Brereton, Chief of Enforcement and Tara Stock, Intake Manager. Ty Humes was an unsuccessful candidate for the San Dieguito Unified High School District Board in the November 2, 2021 Special Election. Friends of Ty Humes for San Dieguito UHSD Trustee Area 5, 2021 is Humes' candidate-controlled committee. The Committee and Humes failed to timely file one pre-election campaign statement (1 count), in violation of Government Code Section 84200.5. **Total Penalty: \$261 (Tier One).**

[In the Matter of Inki Welch for Rincon Water Board 2020, and Inki Welch; FPPC No. 20/1054.](#) Staff: Angela Brereton, Chief of Enforcement and Amber Rodriguez, Political Reform Consultant. Inki Welch was a successful candidate for the Rincon Del Diablo Municipal Water District Board of Directors in the November 3, 2020 General Election. Inki Welch for Rincon Water Board 2020 was Welch's candidate-controlled committee. The Committee and Welch failed to timely file one pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count). **Total Penalty: \$224 (Tier One).**

[In the Matter of Greer Stone; FPPC No. 20/920.](#) Staff: Angela Brereton, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. Greer Stone, candidate for Palo Alto City Council in the November 3, 2020 General Election, failed to timely file a Candidate Intention Statement prior to receiving contributions or making expenditures in relation to their candidacy, in violation of Government Code Section 85200 (1 count). **Total Penalty: \$200 (Tier One).**

[In the Matter of Lydia Kou; FPPC No. 20/856.](#) Staff: Angela Brereton, Chief of Enforcement and Ginny Lambing, Political Reform Consultant. Lydia Kou, candidate for Palo Alto City Council in the November 3, 2020 General Election, failed to timely file a Candidate Intention Statement prior to receiving contributions or making expenditures in relation to their candidacy, in violation of Government Code Section 85200 (1 count). **Total Penalty: \$200 (Tier One).**

Statement of Economic Interests Late Filer

[In the Matter of Brandon Fawaz; FPPC No. 21/1159.](#) Staff: Angela Brereton, Chief of Enforcement and Tara Stock, Intake Manager. Brandon Fawaz, Councilmember for the City of Etna, failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87202 (1 count). **Total Penalty: \$200 (Tier One).**

In the Matter of Theodore Irving; FPPC No. 21/555. Staff: Angela Brereton, Chief of Enforcement and Shaina Elkin, Associate Governmental Program Analyst. Theodore Irving, an Associate Zoning Administrator for the Los Angeles Planning Department, failed to timely file a 2019 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Penalty: \$200 (Tier One).**

II. AUDITS AND ASSISTANCE DIVISION

STAFF: SHRDHA SHAH, CHIEF

A. Overview

The audit reports prepared by the FPPC summarize findings with respect to the filer's conformity with the disclosure and recordkeeping requirements of the Political Reform Act. Copies of audit reports are always sent to the auditees and those included in the audit report (such as the prior treasurer, current treasurer and/or their representatives). These reports are public documents.

B. Current Period Updates

During the period of April 1, 2022 through April 30, 2022, the Audits and Assistance Division adopted 2 audit reports, both with findings. The reports have been transferred to the Enforcement Division pursuant to our standard practice. Currently the team has 33 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.

III. LEGAL DIVISION

STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

Mat Wahlstrom v. FPPC, Steven J. Kaufman and Kaufman Legal Group, APC
San Diego County Superior Court, Central Division
Case No. 37-2020-00030654-CU-WMCTL

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 timely filed an answer to the complaint. Petitioner filed an amended petition on May 12, 2021. The Commission filed a demurrer to the amended petition, the parties submitted briefs and at a hearing on December 13, 2021.

On March 17, 2022, the court issued a tentative ruling sustaining the Commission's demurrer without leave to amend the petition. Petitioner did not request a hearing to contest the tentative ruling, thus the tentative will become the court's final ruling. On April 4, 2022, the court entered a judgment.

B. Outreach and Training

Webinars

- April 14, the FPPC hosted an AB 571 webinar. Education and External Affairs Manager Chloe Hackert, and Political Reform Consultant Katie Trumbly, presented. 4 people attended.
- April 19, the FPPC hosted a Campaign Filing Officer webinar. Political Reform Consultants, Alex Castillo and Adam Ramirez, presented. 7 people attended.
- April 26, the FPPC hosted a Candidate/Treasurer webinar. Political Reform Consultants, Stephen Hernandez and Adam Ramirez, presented. 18 people attended.

Scheduled Webinars

- May 12, the FPPC is hosting an AB 571 webinar.
- May 19, the FPPC is hosting a Candidate/Treasurer webinar.
- May 24, the FPPC is hosting a Campaign Filing Officer webinar.

Video Tutorials

Commission video tutorials were accessed a total of 539 times in April. Form 700 videos were accessed 322 times, the Candidate/Treasurer video was accessed 157 times, and the filing officer videos were accessed 60 times.

C. New and Updated Educational Resources

- Updated Overview of Conflicts of Interest guide: <https://fppc.ca.gov/content/dam/fppc/NS-Documents/TAD/Campaign%20Documents/Conflicts%20Guide%202022.pdf>
- Local contribution limits web page: <https://fppc.ca.gov/learn/Contribution-Limits-City-and-County-Candidates.html>
- Comprehensive fact sheets page: <https://fppc.ca.gov/media/factsheets.html>

D. Advice

The April Advice Letter Report is available on the FPPC website at <https://fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2022-advice-letter-reports/FPPC-advice-letter-report-apr-2022.html>.

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

- **Education:** The Education unit responded to 574 requests for technical assistance via telephone.
- **Requests for Advice:** The Email Advice and Conflict of Interest Code Program and Legal Division attorneys collectively responded to 769 email requests for advice, 117 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 5.
- **Section 1090 Letters:** The Legal Division received 3 advice letter request concerning Section 1090 and completed 2. This year to date, we have received 10 advice requests regarding Section 1090.

E. Miscellaneous Decisions

None

F. Potential Upcoming Regulation Projects

June

- Complaints against Commissioners – Require referral of any complaint or filing officer referral alleging a Commissioner violated the Act to the Office of the Attorney General (adoption).
- Direct Personal Benefit definition – Update the regulatory definition of “direct personal benefit” to reflect amendments made to Section 89521 by AB 1367, as well as other minor clean-up of existing regulations (pre-notice).

July

- Filing Officer Referrals - Provide specific criteria and requirements for filing officials submitting referrals to the Enforcement Division for campaign finance, SEI, behested payment, and lobbying reporting violations (adoption).
- Press Policy – Provide specific rules governing the level of detail provided to the press and public regarding the status of pending Enforcement cases (adoption).
- Cryptocurrency - Consider revising prohibition on making and receiving campaign contributions via cryptocurrency (adoption).
- Bank account signor disclosure - Require disclosure of authorized signors for campaign bank accounts on a statement of organization (pre-notice).

For more information on these and other regulation projects planned for 2022, go to

<https://www.fppc.ca.gov/the-law/fppc-regulations.html>.

G. Conflict of Interest Codes

Adoptions and Amendments

Multi-County:

- Bay Area Water Supply and Conservation Agency and San Francisco Bay Area Regional Water System Financing Authority
- Yuba Community College District
- Desert Sands Public Charter, Inc.
- Alta Vista Public Charter, Inc.

Exemptions

None

Extensions

None

H. Probable Cause Hearings

Probable cause proceedings are conducted per Government Code section 83115.5. A finding of probable cause does not constitute a finding a violation occurred. Respondents are presumed 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 or failed to appear at a probable cause hearing.

- 1. *In the Matter of Dylan Logas for Rio Hondo Community College Board of Trustees 2018 and Duylan Logas, Case No. 2019-00994.*** On April 6, 2022, probable cause was found that Respondents committed the following violations of the Act:

Count 1: On or around October 9, 2018, Logas failed to timely file a candidate intention statement in connection with Logas's candidacy in the November 6, 2018 General Election prior to receiving contributions, in violation of Section 85200.

Count 2: The Committee and Logas failed to timely file an amendment to the Committee's statement of organization with the Secretary of State within 10 days of qualifying as a committee, in violation of Sections 84101, subdivision (a), and 84103.

Count 3: The Committee and Logas failed to timely file a pre-election campaign statement for the reporting period of October 21, 2018 to December 31, 2018, in violation of Section 84200.5, subdivision (a), and 84200.8, subdivision (b).

Count 4: The Committee and Logas failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2019 to June 30, 2019 in violation of Section 84200, subdivision (a).

Count 5: The Committee and Logas failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2019 to December 31, 2019, in violation of Section 84200, subdivision (a).

Count 6: The Committee and Logas failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2020 to June 30, 2020 in violation of Section 84200, subdivision (a).

Count 7: The Committee and Logas failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2020 to December 31, 2020 in violation of Section 84200, subdivision (a).

Count 8: The Committee and Logas failed to timely file a semi-annual campaign

statement for the reporting period of January 1, 2021 to June 30, 2021, in violation of Section 84200, subdivision (a).

Count 9: The Committee and Logas failed to timely file a 24-hour contribution report for a contribution in the amount of \$2,000 received on October 26, 2018, in violation of Section 84203.

2. ***In the Matter of Committee on Yes on Measure N, Johua DeGroat and Katherine Redmon, Case No. 16/19936.*** On April 26, 2022, probable cause was found that Respondents committed the following violations of the Act:

Count 1: Respondents Committee on Yes on Measure N (the Committee), Joshua DeGroat (DeGroat), and Katherine Redmon (Redmon) were required to file a semi-annual campaign statement for the reporting period January 1, 2016, through June 30, 2016, by the August 1, 2016 due date. On or about September 20, 2016, the Committee and Redmon filed a semi-annual campaign statement for the reporting period April 1, 2016, through June 30, 2016. This campaign statement was signed only by Redmon, included the period the Committee had financial activity, but was filed 50 days late. As a result, the Committee, DeGroat and Redmon failed to timely and properly file the semi-annual campaign statement for the period January 1, 2016, through June 30, 2016, by the August 1, 2016 due date, in violation of Government Code section 84200, subdivision (a).

Count 2: The Committee, DeGroat and Redmon were required to file a pre-election campaign statement for the reporting period July 1, 2016, through September 24, 2016, by the September 29, 2016 due date. On or about November 1, 2016, the Committee, DeGroat and Redmon filed a pre-election campaign statement for the reporting period July 1, 2016, through September 30, 2016. This campaign statement was signed by both DeGroat and Redmon and was filed 33 days late. As a result, the Committee, DeGroat and Redmon failed to timely and properly file the pre-election campaign statement for the period July 1, 2016, through September 24, 2016, by the September 29, 2016 due date, in violation of Government Code sections 84200.5, subdivision (a) and 84200.8, subdivision (a).

Count 3: The Committee, DeGroat and Redmon were required to file a pre-election campaign statement for the reporting period September 25, 2016, through October 22, 2016, by the October 27, 2016, due date. On or about June 20, 2017, the Committee, DeGroat and Redmon filed a pre-election campaign statement for the reporting period October 1, 2016,

through November 15, 2016. This campaign statement was signed by both DeGroat and Redmon and was filed 140 days late. As a result, the Committee, DeGroat and Redmon failed to timely and properly file the pre-election campaign statement for the period September 25, 2016, though October 22, 2016, by the October 27, 2016 due date, in violation of Government Code sections 84200.5, subdivision (a) and 84200.8, subdivision (b).

Count 4: The Committee, DeGroat and Redmon were required to disclose contributions received of \$100 or more and expenditures made of \$100 or more on each campaign statement. Review of the campaign statements with the bank records identified underreporting of contributions received by approximately \$50,610 from July 1, 2016, through November 15, 2016. Further, for the same period from July 1, 2016, through November 15, 2016, the campaign statements underreported approximately \$50,008 in expenditures made. The charts below identify the inconsistencies between the Committee bank records and the campaign statements.

Form 460 Period	Bank Records	Form 460	Difference
7/1 – 9/30/2016	\$120,320.00	\$86,300.00	\$34,020.00
10/1 – 11/15/2016	\$29,090.24	\$12,500.00	\$16,590
Total unreported contributions			\$50,610
Form 460 Period	Bank Records	Form 460	Difference
7/1 – 9/30/2016	\$150,139.84	\$116,396.88	\$33,742
10/1 – 11/15/2016	\$30,289.42	\$14,023.12	\$16,266
Total unreported expenditures			\$50,008

As a result, the Committee, DeGroat and Redmon failed to report approximately \$50,610 in contributions received and approximately \$50,008 in expenditures made, in violation of Government Code section 84211, subdivisions (f) and (k).

Counts 5-12: The Committee and DeGroat were required to file a 24-Hour Contribution Report within 24 hours of receiving a contribution aggregating \$1,000 or more that is made or received by a primarily formed committee during the 90-day period preceding an election or on the date of the election. The late contribution reporting period for the November 8, 2016 Election was from August 10, 2016, through November 8, 2016. The Committee and DeGroat failed to timely file eight 24-Hour Contribution Reports, as follows:

Count	Description	Date Due	Date Filed
5	\$7,500 from CCO/AM-PM Management	9/9/2016	Not Filed
6	\$5,000 from Anthony Garibaldi	9/16/2016	Not Filed
7	\$5,000 from Cody W. Buh	9/16/2016	Not Filed
8	\$7,500 from PM Realty Investments, Inc.	10/13/2016	Not Filed
9	\$5,000 from Lonnie Hadley	10/25/2016	Not Filed
10	\$10,400 from Macario Specialties	10/25/2016	Not Filed
11	\$5,000 from Cody W. Buh	10/25/2016	Not Filed
12	\$5,000 from East Orange Show Investors, LLC	11/1/2016	Not Filed
	Total: \$50,400		

As a result, the Committee and DeGroat failed to timely file eight 24-Hour Contribution Reports, totaling \$50,400, in violation of Government Code section 84203.

Counts 13-19: No contribution of \$100 or more may be received in cash. The Committee and DeGroat accepted approximately 24% of the contributions received in cash or cashier's checks, included in the chart below:

Count	Date Deposited	Contributor	Manner of Payment	Amount
13	6/14/2016	Philip M. Baltierra	Cashier's Check	\$10,000.00
14	7/22/2016	Steve Green	Cashier's Check	\$7,000.00
15	7/22/2016	Steve Green	Cashier's Check	\$8,000.00
16	7/26/2016	Unknown	Cash	\$4,000.00
17	7/27/2016	Phillip Womack	Cashier's Check	\$2,000.00
18	8/5/2016	Philip M. Baltierra	Cashier's Check	\$4,600.00
19	9/8/2016	CCO/AM-PM Management	Cashier's Check	\$7,500.00
Total prohibited cash and cashier's checks over \$100				

	received	\$43,100.00
	Percent of total contributions received	24%

As a result, the Committee and DeGroat accepted seven contributions in cash and cashier's checks, totaling approximately \$43,100, in violation of Government Code section 84300, subdivisions 3 (a) and (c).

Count 20: According to the invoice, on or about October 30, 2016, the Committee and DeGroat sent 14,892 direct mail cards that were 8.5" x 11" in size. The mailers included the language "Paid for by Committee for Yes on Measure N, Campaign ID #1386355," lacking a committee street address and city. As a result, the Committee and DeGroat failed to include the street address and city of the Committee on a mass mailer, in violation of Government Code section 84305, and Regulation 18435.

Count 21: According to a second invoice, on or about November 2, 2016, the Committee and DeGroat sent 7,496 direct mail cards that were 8.5" x 11" in size. The mailers included the language "Paid for by Committee for Yes on Measure N, Campaign ID #1386355," lacking a committee street address and city. As a result, the Committee and DeGroat failed to include the street address and city of the Committee on a mass mailer, in violation of Government Code section 84305, and Regulation 18435.

Count 22: The Committee and DeGroat were required to provide notice to seven Major Donors of their filing requirements and failed to do so, as detailed in the chart below:

Major Donor Name	Total 2016 Contributions	Method of Payment
Anthony Garibaldi	12,000.00	Personal check
Cody W. Buh	17,000.00	Personal check
TBR Holdings LLC	10,620.00	Business check
Phillip M. Baltierra	14,600.00	Cashier's check
Macario Specialties	10,400.00	Business check
Steve Green	15,000.00	Cashier's check
Brandon Burkhart	14,620.00	Personal check

As such, the Committee and DeGroat failed to provide required notices to seven Major Donors informing of their filing requirements, in violation of Government Code section

84105, and Regulation 18427.1.

Count 23: The Committee and DeGroat had a duty to maintain detailed accounts, records, bills and receipts necessary to prepare campaign statements and to establish that the campaign statements were properly filed for reporting periods between July 1, 2016, through December 31, 2016. As such, the Committee and DeGroat failed to maintain detailed accounts, records, bills and receipts as required, in violation of Government Code section 84104.

IV. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: LORESSA HON, CHIEF

A. New Employee Report

No New Staff to Report

B. Statement of Economic Interest (Form 700)

As of May 1, 2022, there were 2 Form 700 non-filers of the 2021/2022 Annual Form 700 filing from the 87200-filer (March 1st) group.