



EXECUTIVE STAFF REPORTS

August 15, 2024, Commission Hearing

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I. ENFORCEMENT DIVISION

STAFF: JAMES M. LINDSAY, CHIEF OF ENFORCEMENT

A. Overview

During the period of June 1, 2024, through July 31, 2024, the Enforcement Division received the following complaints and referrals:

	Sworn	Non-Sworn	Anonymous	Referrals
Number Received	79	18	48	265

The number of complaints and referrals received by the Enforcement Division in June and July was similar to previous months in 2024.

For the months of June and July, more time to respond beyond the 14-day statutory period was needed for approximately 10 sworn complaints. Generally, additional time to respond was utilized in order to give respondents more time to respond to inquiries when it was requested.

Additionally, for the months of June and July, the Enforcement Division opened 159 cases, rejected 263 complaints and referrals, and closed a total of 197 cases including:

- 101 warning letters – advertisement violations (4), behested payment violations (2), campaign violations (17), conflict of interests (3), and statement of economic interests violations (75);
- 33 no action closure letters: PREP completed – statement of economic interests violations;
- 22 no action closure letters alleging – advertisement violations (1), campaign violations (9), and statement of economic interests violations (12);
- 13 approved stipulations from the May Commission meeting;
- 27 committees were administratively terminated;
- 1 case closed as a duplicate.

The Division had a total of 922 cases in various stages of resolution at the time of the June Monthly Report and currently has approximately 879 cases in various stages of resolution, including the 20 streamline cases, 2 mainline cases, and 1 default case before the Commission as listed in the August Agenda. Net case closures since the last monthly report totaled 43.

B. Annual Statistics

The following is a chart that details the annual statistics for enforcement complaints, referrals and cases over the past five years. The statistics show a marked increase in complaints during election years while referrals have generally increased gradually over time.

	Year	2019	2020	2021	2022	2023
1	Complaints Received	744	1,390	606	1,379	653
2	Referrals Received	1,950	1,518	1,751	1,724	1,971
3	Total Complaint and Referrals Received	2,694	2,908	2,357	3,103	2,624
4	Cases opened	1,820	1,155	1,185	990	831
5	Cases closed ³	1,465	1,526	1,058	1,075	1,295
6	Cases with penalties ¹	343	278	269	161	98
	a Streamline cases	263	194	234	142	55
	b Mainline cases	73	77	32	14	11
	c Default cases	7	7	3	5	1
7	Total fines imposed	\$797,384	\$1,940,107	\$472,248	\$617,548	\$376,531
8	Warning letters issued	584	777	475	681	813
9	Administrative terminations	104	62	59	53	87
10	Cases closed with violations found ²	1,031	1,117	803	895	998
11	Advisory letters issued	9	7	16	8	15
12	No action closure letters	423	402	237	217	296
	a PREP Completed	--	--	--	39	86

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. 2022-2023 Quarterly Caseload Summary

The following is a chart that compares the number of cases from given years at the end of each quarter during 2023. Enforcement has successfully focused on the resolution of older cases.

	June 2023	September 2023	December 2023	March 2024	June 2024	Difference in Existing Caseload Overall
2017	2	2	1	0	0	-2
2018	56	34	21	12	8	-48
2019	125	69	39	23	22	-103
2020	234	201	153	118	103	-131
2021	298	232	167	148	124	-174
2022	329	307	248	213	191	-138
2023	220	295	323	276	260	+40

D. Presentations

James M. Lindsay, Chief of Enforcement, gave a presentation entitled FPPC Enforcement Overview to attendees at the annual meeting of the California Political Treasurers Association. The presentation occurred virtually to an audience located in Palm Springs with approximately 40 people in attendance.

E. 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.

Behested Payments

[In the Matter of Sergio Contreras; FPPC No. 20/931.](#) Staff: Laura Columbel, Commission Counsel and George Aradi, Special Investigator. Sergio Contreras, a City Council Member for the City of Westminster, failed to timely file one behested payment report, in violation of

Government Code Section 84224 (1 count) and failed timely report a source of income on a 2017, 2018, and 2019 Annual Statements of Economic Interests, in violation of Government Code Section 87207 (3 counts). **Total Penalty: \$2,300 (Tiers One & Two).**

In the Matter of Mike Gipson; FPPC No. 24/544. Staff: James M. Lindsay, Chief of Enforcement and Vanessa Greer, Political Reform Consultant. Mike Gipson, current State Assemblymember representing District 65, failed to timely file nine behested payment reports, in violation of Government Code Section 84224 (9 counts). Chief Discretion was used in this matter. **Total Penalty: \$1,800 (Tier One).**

Cash and In-Kind Contributions and/or Expenditures

In the Matter of Sophia Rodriguez for Board of Supervisors 2020-District 1 and Sophia S. Rodriguez; FPPC No. 23/456. Staff: Bridgette Castillo, Senior Commission Counsel. This matter arose from an audit performed by the Franchise Tax Board's Political Reform Audit Program. Sophia Rodriguez was an unsuccessful candidate for San Diego County Supervisor in the March 3, 2020 Primary Election. Sophia Rodriguez for Board of Supervisors 2020-District 1 was Rodriguez's candidate-controlled committee. Rodriguez served as the Committee's treasurer. The Committee and Rodriguez accepted cash contributions of \$100 or more, in violation of Government Code Section 84300 (1 Count). Chief Discretion was used in this matter. **Total Penalty: \$502 (Tier One).**

Advertisements

In the Matter of Kansen Chu and Kansen Chu for Assembly 2022; FPPC No. 20/762. Staff: Jenna C. Rinehart, Senior Commission Counsel and Ann Flaherty, Special Investigator. Respondents were represented by Eric Lee and Tom Willis with Olson Remcho LLP. Kansen Chu was an unsuccessful candidate for State Assembly, District 24, in the June 7, 2022 Primary Election. Kansen Chu for Assembly 2022 was Chu's candidate-controlled committee. Chu served as the Committee's principal officer. The Committee and Chu failed to include the Committee's address and the "Paid for by" language on two mass mailings, in violation of Government Code Section 84305 and Regulation 18435 (2 counts). Additionally, the Committee and Chu created a Facebook and Twitter page that failed to include the required "Ad paid for by" followed by the Committee's name on each page's cover or header photo, in violation of Government Code Sections 84504.4 and 84504.3 (2 counts). The disclosure violations concerning the Facebook and Twitter pages are eligible for a Warning Letter and are included in the streamline stipulation as a \$0 penalty. **Total Penalty: \$1,342 (Tier One).**

In the Matter of No Way Greenway – Vote No on Deceptive Measure D, FORT, and Matt Ferrell; FPPC No. 21/948. Staff: Alex Rose, Senior Commission Counsel. Respondents were represented by Gary Winuk of Kaufman Legal Group. No Way Greenway – Vote No on Deceptive Measure D was a local primarily formed committee in opposition to Measure D in the Santa Cruz County June 7, 2022 Primary Election. FORT was an independent expenditure committee. Ferrell was the Treasurer for both committees. No Way Greenway and Ferrell failed to timely file a Statement of Organization and failed to include proper advertisement disclosures.

FORT and Ferrell failed to timely file a semi-annual campaign statement and to include proper advertisement disclosures, in violation of Government Code Sections 84200, 84103, 84504.2, 84504, and 84502 (5 counts). Certain violations are eligible for a Warning Letter and are included in the streamline stipulation as a \$0 penalty. **Total Penalty: \$1,054 (Tier One).**

Campaign Late Reporter

In the Matter of Supporters of Recall Pamela Price and Stacy Owens; FPPC No. 24/489.

Staff: Jenna C. Rinehart, Senior Commission Counsel. Respondents were represented by Emily Andrews of Olson Remcho LLP. Supporters of Recall Pamela Price is a primarily formed ballot measure committee, formed to support the recall of Alameda County District Attorney Pamela Price. Stacy Owens serves as the Committee's treasurer. The Committee and Owens failed to timely disclose the Committee's date of qualification, in violation of Government Code Sections 84101 and 84103 (1 count) and failed to timely and accurately disclose the recipient committee's name for which it made a non-monetary contribution, in violation of Section 84211 (1 count). Additionally, the Committee and Owens failed to timely file an amendment to the statement of organization to change the Committee's designation and name to reflect that it was primarily formed, in violation of Government Code Section 84103 and Regulation 18247.5 (1 count), failed to timely file a quarterly campaign statement, in violation of Government Code Section 84202.3 (1 count), and failed to timely file a 10-day Report, in violation of Government Code Section 84204.5 (1 count). The disclosure violations concerning the Facebook and Twitter pages are eligible for a Warning Letter and are included in the streamline stipulation as a \$0 penalty. Chief Discretion was used in this matter. **Total Penalty: \$3,700 (Tiers One & Two).**

Campaign Late Filer

In the Matter of Association of San Miguel Firefighters Local 1434, Patrick Carroll, and Damian Arruda; FPPC No. 22/772.

Staff: Jaleena Evans, Commission Counsel. Association of San Miguel Firefighters Local 1434 is a local general purpose committee. Patrick Carroll previously served as the Committee's treasurer. Damian Arruda is the Committee's current treasurer. The Committee, Carroll, and Arruda violated the Act by failing to timely file one semi-annual campaign statement, two pre-election campaign statements, and one 24-Hour Report in violation of Government Code Sections 84200, 84200.5, and 84203. Chief Discretion was used in this matter. **Total Penalty: \$941 (Tier One).**

In the Matter of Campaign to Elect Maria G. Lopez for School Board 2015 and Maria Lopez; FPPC No. 20/1135.

Staff: Jonathan Rivera, Commission Counsel and Carlie A. Haug, Staff Services Analyst. Maria Lopez was a successful candidate for the Lynwood Unified School District in the November 3, 2015 General Election. Campaign to Elect Maria G. Lopez for School Board 2015 was Lopez's candidate-controlled committee. The Committee failed to timely file four 24-Hour Reports, in violation of Government Code Section 84203 (4 counts). Chief Discretion was used in this matter. **Total Penalty: \$927 (Tier One).**

In the Matter of Brea Olinda Teachers Association PAC, Tamara O'Rourke; FPPC No. 20/1045.

Staff: Chance Felkins, Commission Counsel. Brea Olinda Teachers Association PAC"

is a general purpose committee. Tamara O'Rourke serves as the Committee's treasurer. The Committee and O'Rourke failed to timely file one pre-election campaign statement and one 24-Hour Report, in violation of Government Code Sections 84200.5 and 84204 (2 counts). Chief Discretion was used in this matter. **Total Penalty: \$449 (Tier One).**

Statement of Economic Interests Late Filer

In the Matter of Vignesh Swaminathan; FPPC No. 24/077. Staff: Alex Rose, Senior Commission Counsel. Vignesh Swaminathan, a Member of 2000 Measure A Citizens Watchdog Committee for the City of Cupertino and Santa Clara Valley Transportation Authority/Sustainability Commissioner, failed to timely file 2019, 2020, 2021, and 2022 Annual Statements of Economic Interests, in violation of Government Code Section 87300 (4 counts). **Total Penalty: \$800 (Tier One).**

In the Matter of Gloria Molleda; FPPC No. 23/819. Staff: Marissa Corona, Commission Counsel and Special Investigator Kaitlin Angeloni. Gloria Molleda served as City Manager for the City of Rosemead. Molleda failed to timely file the 2018, 2019 and 2020 Annual Statements of Economic Interests, in violation of Government Code Section 87302 (3 counts); and failed to timely disclose a loan on the 2019 Annual Statement of Economic Interests, in violation of Government Code Section 87207 (1 count). Chief Discretion was used in this matter. **Total Penalty: \$800 (Tier One).**

In the Matter of Cindy Rodas; FPPC No. 24/174. Staff: Alex Rose, Senior Commission Counsel. Cindy Rodas, Finance Director and Alternate Board Member of Pooled Liability Assurance Network Joint Powers Authority failed to timely file a 2020, 2022, and 2023 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (3 counts). Certain violations are eligible for a Warning Letter and are included in the streamline stipulation as a \$0 penalty. **Total Penalty: \$800 (Tier Two).**

In the Matter of Arturo Ramirez; FPPC No. 24/250. Staff: Alex Rose, Senior Commission Counsel. Arturo Ramirez, Planning Commissioner of the City of Lynwood, failed to timely file 2021, 2022, and 2023 Annual Statements of Economic Interests, in violation of Government Code Section 87203 (3 counts). **Total Penalty: \$600 (Tier One).**

In the Matter of Marisa Llamas; FPPC No. 19/254. Staff: Laura Columbel, Commission Counsel and Alethea Perez, Special Investigator. The respondent was represented by Michael Schulte of Farley Law Firm. Marisa Llamas, a Planning Commissioner for the City of Farmersville, failed to timely file 2017 and 2019 Annual Statements of Economic Interest, in violation of Government Code Section 87203 (2 counts). **Total Penalty: \$600 (Tier One).**

In the Matter of Fabian Wesson; FPPC No. 24/87. Staff: Alex Rose, Senior Commission Counsel. Fabian Wesson, Board Member of the Science Center, failed to timely file 2022 and 2023 Annual and Leaving Office Statement of Economic Interests, in violation of Government Code Section 87300 (3 counts). **Total Penalty: \$600 (Tier One).**

In the Matter of Michelle Weed; FPPC No. 24/361. Staff: James M. Lindsay, Chief of Enforcement and Amber Rodriguez, Staff Services Analyst. Michelle Weed, a Board Member for the Northeastern Joint Powers Authority, failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87202 (1 count). **Total Penalty: \$400 (Tier One).**

In the Matter of Rick Whisman; FPPC No. 24/027. Staff: Alex Rose, Senior Commission Counsel. Rick Whisman, Planning Commissioner for the City of Petaluma, failed to timely file a 2022 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Penalty: \$200 (Tier One).**

In the Matter of Richard Hernandez; FPPC No. 24/033. Staff: Alex Rose, Senior Commission Counsel. Richard Hernandez, Planning Commissioner for the City of Carson, failed to timely file a 2022 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Penalty: \$200 (Tier One).**

In the Matter of Katherine Turner; FPPC No. 24/386. Staff: James M. Lindsay, Chief of Enforcement and Amber Rodriguez, Staff Services Analyst. Katherine Turner is represented by Ralph Cordova Jr. of Cordova Law and Consulting. Katherine Turner, a City Attorney for the City of Imperial, failed to timely file a 2022 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Penalty: \$200 (Tier One).**

In the Matter of Andrea Cardenas; FPPC No. 23/305. Staff: Alex Rose, Senior Commission Counsel; Paul Rasey, Special Investigator. The respondent was represented by Richard Rios of Olson Remcho, LLP. Andrea Cardenas, as a Chula Vista City Councilmember, failed to timely report Grassroots Resources as a source of income on her 2022 Annual Statement of Economic Interests, in violation of Government Code Section 87207 (1 count). **Total Penalty: \$100 (Tier One).**

II. AUDIT DIVISION

STAFF: SHRDHA SHAH, CHIEF OF AUDITS

Audits are conducted per Government Code sections 90000 - 90008 of the Political Reform Act (the Act). The Act requires full disclosure of receipts and expenditures of candidates and committees and disclosure of the finances of lobbyists. The purpose of the audits is to determine the level of compliance of the auditees with the Act. The opinions expressed in the audit report reflect the level of compliance with the Act. The FPPC is not responsible for the contents of the candidate's documents. Audit reports are then submitted to the Enforcement Division for further review.

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 June 1, 2024 to July 31, 2024, the Audits and Assistance Division adopted 3 audit reports, all with no findings. Currently, the team has 35 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.

Details of the audit report adopted during the period are as follows:

- **Baca for Supervisor 2020 (ID# 1419063)**
 - No findings noted
- **Nadia Renner for Board of Supervisors 2020 (ID# 1422891)**
 - No findings noted
- **James Ramos for San Bernardino County 3rd District Supervisor 2020 (ID# 1388634)**
 - No findings noted

III. LEGAL DIVISION

STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

None

B. Outreach and Training

Webinars & Workshops

June

- June 4, the FPPC presented a Candidate/Treasurer webinar for the California Special Districts Association (CSDA). Political Reform Consultants, Adam Ramirez and Stephen Hernandez, presented. 22 people attended.
- June 11, the FPPC presented a Campaign Filing Officer webinar. Political Reform Consultants, Alexandra Castillo and Stephen Hernandez, presented. 64 people attended.
- June 11, Assistant Chief Counsel Sukhi Brar and Communications Director Jay Wierenga gave a presentation about the FPPC and its functions to 25 visitors taking part in the U.S. Department of State International Visitor Leadership Program. The visitors were from countries in South America, Africa, Asia and Europe.
- June 20, the FPPC presented a Statement of Economic Interests Filers webinar requested by the County of Santa Clara. Political Reform Consultants, Adam Ramirez and Katie Trumbly, presented. 25 people attended.
- June 20, the FPPC presented a Candidate/Treasurer webinar requested by the County of Santa Clara. Political Reform Consultants, Katie Trumbly and Adam Ramirez, presented. 33 people attended.
- June 21, Education and External Affairs Unit Manager, Chloe Hackert, presented an FPPC education and outreach update at the 22nd Annual Political Treasurers Association (CPTA) conference. Approximately 25 people attended.
- June 26, the FPPC presented a Candidate/Treasurer workshop requested by the County of Tulare. Political Reform Consultant, Stephen Hernandez, presented. 26 people attended.
- June 26, the FPPC presented a Candidate/Treasurer Getting Started webinar requested by the County of Contra Costa. Political Reform Consultant, Alexandra Castillo, presented. 20 people attended.

July

- July 11, the FPPC presented a How to Complete Form 460 webinar. Political Reform Consultants, Alexandra Castillo and Stephen Hernandez, presented. 50 people attended.

- July 12, the FPPC presented a Candidate/Treasurer webinar requested by the City of Santa Clara. Political Reform Consultant, Stephen Hernandez, presented. 27 people attended.
- July 15, the FPPC presented a Section 84308 (Levine Act) webinar requested by the Association of Community Human Service Agencies (ACHSA). Senior Commission Counsel, Kevin Cornwall, and Education & External Affairs Unit Manager, Chloe Hackert, presented. 45 people attended.
- July 23, the FPPC presented a Statement of Economic Interests Filers webinar requested by Public Risk Innovation Solutions and Management (PRISM). Political Reform Consultant, Katie Trumbly, presented. 5 people attended.
- July 25, the FPPC presented a Candidate/Treasurer webinar requested by the City of Anaheim. Political Reform Consultants, Alexandra Castillo and Stephen Hernandez, presented. 36 people attended.

Scheduled Webinars

- August 13, the FPPC is presenting a Candidate/Treasurer webinar.
- August 22, the FPPC is presenting a General Purpose Committee webinar.
- August 29, the FPPC is presenting a How to Complete Forms 460 & 497 webinar.

Video Tutorials:

June: Commission video tutorials were accessed a total of 522 times. Form 700 videos were accessed 265 times, the Candidate/Treasurer video was accessed 179 times, and the filing officer videos were accessed 78 times.

July: Commission video tutorials were accessed a total of 892 times. Form 700 videos were accessed 533 times, the Candidate/Treasurer video was accessed 282 times, and the filing officer videos were accessed 77 times.

C. New and Updated Educational Resources

- Updated [Cryptocurrency Contributions Fact Sheet](#)

D. Political Reform Education Program (PREP):

- In June, PREP received 21 referrals for the Statement of Economic Interests course. During this time, 18 learners completed PREP, 3 failed to complete PREP, and 32 learners are enrolled but have not yet completed the course.
- In July, PREP received 30 referrals for the Statement of Economic Interests course. During this time, 18 learners completed PREP, and 44 learners are enrolled but have not yet completed the course. PREP also received 1 referral for the Campaign Course for Local Candidates and Candidate-Controlled Committees. 1 learner is enrolled but has not yet completed the course.

E. Advice

The [June Advice Letter Report](https://fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2023-advice-letter-reports.html) is available on the FPPC website at <https://fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2023-advice-letter-reports.html>.

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

- **Education:** The Education unit responded to 394 requests for technical assistance via telephone.
- **Requests for Advice:** Political Reform Consultants and Legal Division attorneys collectively responded to 469 email requests for advice, 128 of which were not responded to within 24 hours and 73 of those were not responded to within 48 hours.
- **Advice Letters:** The Legal Division received 9 advice letter requests under the Political Reform Act and completed 11.
- **Section 1090 Letters:** The Legal Division received 1 advice letter request concerning Section 1090 and completed 3.

The [July Advice Letter Report](https://fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2023-advice-letter-reports.html) is available on the FPPC website at <https://fppc.ca.gov/advice/advice-opinion-search/advice-letter-reports/2023-advice-letter-reports.html>.

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

- **Education:** The Education unit responded to 923 requests for technical assistance via telephone.
- **Requests for Advice:** Political Reform Consultants and Legal Division attorneys collectively responded to 881 email requests for advice, 355 of which were not responded to within 24 hours and 228 of those were not responded to within 48 hours.
- **Advice Letters:** The Legal Division received 9 advice letter requests under the Political Reform Act and completed 8.
- **Section 1090 Letters:** The Legal Division received 3 advice letter requests concerning Section 1090 and completed 3. In 2024 we have received 30 advice requests regarding Section 1090.

F. Miscellaneous Decisions

None

G. Upcoming Regulation Projects

September

Conflict of Interest – public generally exception – Amend current regulation to add a specific public generally exception for members of districts primarily responsible for the management of airport, harbor, or similar publicly available infrastructure, if the member has a permit or lease for use of the facilities and the decision will affect all existing permit or lease holders in a similar manner without a unique effect on the board member. (Pre-notice)

Levine Act updates – Various updates to Levine Act (84308) regulations adopted in 2023. (Pre-notice)

October

Transfers to interest-bearing accounts – Amend existing regulation concerning committee bank accounts to explicitly permit general purpose committees and political party committees to transfer “all purpose” funds to an interest-bearing account so long as the funds are transferred back to the “all purpose” account before the committee spends the funds. (Adoption)

November

COLA - Amend various regulations to reflect biennial cost of living adjustments required by statute. (Adoption)

Conflict of Interest – public generally exception – Amend current regulation to add a specific public generally exception for members of districts primarily responsible for the management of airport, harbor, or similar publicly available infrastructure, if the member has a permit or lease for use of the facilities and the decision will affect all existing permit or lease holders in a similar manner without a unique effect on the board member. (Adoption)

Levine Act updates – Various updates to Levine Act (84308) regulations adopted in 2023. (Adoption)

For more information on these and other regulation projects planned for 2024, go to <https://www.fppc.ca.gov/the-law/fppc-regulations.html>.

H. Conflict of Interest Codes

Adoptions and Amendments

State Agencies

None

Multi-County Agencies

- Santa Cruz-Monterey-Merced-San Benito-Mariposa Managed Medical Care Commission
- Altus Schools Southern California
- Great Redwood Trail Agency

- California Risk Management Authority
- Black Gold Cooperative Library System
- East Bay Regional Park District
- Employment Risk Management Authority

Exemptions

- Advisory Council on Improving Interactions between People with Intellectual and Development Disabilities and Law Enforcement

Extensions

- Independent Review Group
- California Actuarial Advisory Panel

I. Probable Cause Proceedings

Probable cause proceedings are conducted per Government Code section 83115.5. A finding of probable cause exists when the evidence supports a reasonable belief or strong suspicion that a violation occurred but does not constitute a finding a violation occurred. Respondents are presumed innocent of any violation of the Act until a violation is proven in a subsequent proceeding.

In the Matter of Adrian Greer for Azusa School Board 2018 and Adrian Greer, Case No. 2021-00089. On June 5, 2024, probable cause was found, after hearing, that Respondent committed the following violations of the Act:

- Count 11: Greer failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2022 to June 30, 2022 in violation of Section 84200, subdivision (a).
- Count 12: Greer failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2022 to December 31, 2022 in violation of Section 84200, subdivision (a).
- Count 13: Greer failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2023 to June 30, 2023 in violation of Section 84200, subdivision (a).
- Count 14: Greer failed to timely file a semi-annual campaign statement for the reporting period of July 1

In the Matter of Sandy Genis for Costa Mesa City Council 2016 (“2016 Committee”), Sandy Genis for Costa Mesa Mayor 2018 (“2018 Committee”), Sandy Genis for Costa Mesa Mayor 2020 (“2020 Committee”), Sandy Genis (“Genis”), and Michael Harmanos (“Harmanos”), Case No. 18-1359. On June 10, 2024, probable cause was found, on the papers, that respondent committed the following violations of the Act:

- Count 1: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2019 through December 31, 2019 by the January 31, 2020 deadline, in violation of Government Code Section 84200.
- Count 2: The 2016 Committee, Genis, and Harmanos failed to timely file a pre-election campaign statement for the reporting period of July 1, 2020 through September 19, 2020 by the September 24, 2020 deadline, in violation of Government Code Sections 84200.5 and 84200.8
- Count 3: The 2016 Committee, Genis, and Harmanos failed to timely file a pre-election campaign statement for the reporting period of September 20, 2020 through October 17, 2020 by the October 22, 2020 deadline, in violation of Government Code Sections 84200.5 and 84200.8.
- Count 4: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign statement for the reporting period of October 18, 2020 through December 31, 2020 by the February 1, 2021 deadline, in violation of Government Code Section 84200.
- Count 5: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021 deadline, in violation of Government Code Section 84200.
- Count 6: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022 deadline, in violation of Government Code Section 84200.
- Count 7: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022 deadline, in violation of Government Code Section 84200.
- Count 8: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023 deadline, in violation of Government Code Section 84200.

- Count 9: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 deadline, in violation of Government Code Section 84200.
- Count 10: The 2016 Committee, Genis, and Harmanos failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2023 through December 31, 2023 by the January 31, 2024 deadline, in violation of Government Code Section 84200.
- Count 11: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2019 through June 30, 2019 by the July 31, 2019 deadline, in violation of Government Code Section 84200.
- Count 12: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2019 through December 31, 2019 by the January 31, 2020 deadline, in violation of Government Code Section 84200.
- Count 13: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2020 through June 30, 2020 by the July 31, 2020 deadline, in violation of Government Code Section 84200.
- Count 14: The 2018 Committee and Genis failed to timely file a pre-election campaign statement for the reporting period of July 1, 2020 through September 19, 2020 by the September 24, 2020 deadline, in violation of Government Code Sections 84200.5 and 84200.8.
- Count 15: The 2018 Committee and Genis failed to timely file a pre-election campaign statement for the reporting period of September 20, 2020 through October 17, 2020 by the October 22, 2020 deadline, in violation of Government Code Sections 84200.5 and 84200.8.
- Count 16: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of October 18, 2020 through December 31, 2020 by the February 1, 2020 deadline, in violation of Government Code Section 84200.
- Count 17: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021 deadline, in violation of Government Code Section 84200.
- Count 18: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022 deadline, in violation of Government Code Section 84200.

- Count 19: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022 deadline, in violation of Government Code Section 84200.
- Count 20: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023 deadline, in violation of Government Code Section 84200.
- Count 21: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 deadline, in violation of Government Code Section 84200.
- Count 22: The 2018 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2023 through December 31, 2023 by the January 31, 2024 deadline, in violation of Government Code Section 84200.
- Count 23: The 2020 Committee and Genis failed to timely amend its statement of organization with the SOS and Costa Mesa City Clerk, due within 10 days of qualifying as a recipient committee, in violation of Government Code Section 84101.
- Count 24: The 2020 Committee and Genis failed to timely file a pre-election campaign statement for the reporting period of July 1, 2020 through September 19, 2020 by the September 24, 2020 deadline, in violation of Government Code Sections 84200.5 and 84200.8.
- Count 25: The 2020 Committee and Gensis failed to timely report all contributor information for loans totaling \$3,815.99 on the pre-election statement covering the period of July 1, 2020 through September 19, 2020, in violation of Government Code Section 84211.
- Count 26: The 2020 Committee and Genis failed to timely file a pre-election campaign statement for the reporting period of September 20, 2020 through October 17, 2020 by the October 22, 2020 deadline, in violation of Sections Government Code 84200.5 and 84200.8.
- Count 27: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of October 18, 2020 though December 31, 2020 by the February 1, 2020 deadline, in violation of Government Code Section 84200.
- Count 28: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021 deadline, in violation of Government Code Section 84200.

- Count 29: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022 deadline, in violation of Government Code Section 84200.
- Count 30: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022 deadline, in violation of Government Code Section 84200.
- Count 31: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023 deadline, in violation of Government Code Section 84200.
- Count 32: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 deadline, in violation of Government Code Section 84200.
- Count 33: The 2020 Committee and Genis failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2023 through December 31, 2023 by the January 31, 2024 deadline, in violation of Government Code Section 84200.

In the Matter of Barbara “Bobbi” Chadwick, Case No. 2018-017. On June 13, 2024, probable cause was found, on the papers, that Respondent committed the following violations of the Act:

- Count 1: Chadwick failed to timely file the 2020 Annual/Leaving Office SEI by the February 3, 2021 due date, in violation of Government Code Section 87204.
- Count 2: Chadwick failed to timely disclose Family Trees LLC as a source of income to Professional Building Consultants, a business in which Chadwick had an ownership interest, on the 2018 Annual SEI, by the April 1, 2019 due date, in violation of Government Code Section 87207, subdivision (b).
- Count 3: Chadwick failed to timely disclose Family Trees LLC as a source of income to Professional Building Consultants, a business in which Chadwick had an ownership interest, on the 2019 Annual SEI, by the June 1, 2020 due date, in violation of Government Code Section 87207, subdivision (b).
- Count 4: Chadwick failed to timely disclose Family Trees LLC as a source of income to Professional Building Consultants, a business in which Chadwick had an ownership interest, on the 2020 Annual/Leaving Office SEI, by the February 3, 2021 due date, in violation of Government Code Section 87207, subdivision (b).
- Count 5: Chadwick failed to timely disclose Family Trees LLC as a source of income for the sale of real property on the 2019 Annual SEI, by the June 1, 2020 due date, in violation of Government Code Section 87207, subdivision (a).

Count 6: Chadwick failed to timely disclose Family Trees LLC as a source of income for the sale of real property on the 2020 Annual/Leaving Office SEI, by the February 3, 2021 due date, in violation of Government Code Section 87207, subdivision (a).

In the Matter of Steve Grasha for Mission Springs Water District 2018 (“2018 Committee”), Steve Grasha for Desert Water Agency 2022 (“2022 Committee”), and Steve Grasha. Case No. 2018-01268. On June 19, 2024, probable cause was found, on the papers, that respondents committed the following violations of the Act:

Count 1: The 2018 Committee and Grasha failed to timely file a statement of organization with the Secretary of State, due within 10 days of qualifying as a recipient committee, in violation of Government Code Section 84101.

Count 2: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a \$1,395 contribution received on September 11, 2018 by the September 12, 2018 due date, in violation of Government Code Section 84203.

Count 3: The 2018 Committee and Grasha failed to timely file the first pre-election campaign statement for the reporting period of July 1, 2018 through September 22, 2018 by the September 27, 2018 due date, in violation of Government Code Sections 84200.5 and 84200.8.

Count 4: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a \$1,500 contribution received on September 23, 2018 by the September 24, 2018 due date, in violation of Government Code Section 84203.

Count 5: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a \$3,154.60 contribution received on October 17, 2018 by the October 18, 2018 due date, in violation of Government Code Section 84203.

Count 6: The 2018 Committee and Grasha failed to timely file the second pre-election campaign statement for the reporting period of September 23, 2018 through October 20, 2018 by the October 25, 2018 due date, in violation of Government Code Sections 84200.5 and 84200.8.

Count 7: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a \$3,154.60 contribution received on October 26, 2018 by the October 29, 2018 due date, in violation of Government Code Section 84203.

Count 8: The 2018 Committee and Grasha failed to timely file a 24-hour contribution report for a \$3,154.60 contribution received on October 30, 2018 by the October 31, 2018 due date, in violation of Government Code Section 84203.

- Count 9: The 2018 Committee and Grasha failed to timely file a semi-annual campaign statement for the reporting period of October 21, 2018 through December 31, 2018 by the January 31, 2019 due date, in violation of Government Code Section 84200.
- Count 10: The 2018 Committee and Grasha failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2019 through June 30, 2019 by the July 31, 2019 due date, in violation of Government Code Section 84200.
- Count 11: The 2018 Committee and Grasha failed to make all campaign expenditures, totaling approximately \$15,748.96, from a single designated campaign bank account, in violation of Government Code Section 85201.
- Count 12: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email distributed on October 5, 2018, in violation of Government Code Section 84305, subdivision (c)(1).
- Count 13: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email distributed on October 7, 2018, in violation of Government Code Section 84305, subdivision (c)(1).
- Count 14: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email distributed on October 12, 2018, in violation of Government Code Section 84305, subdivision (c)(1).
- Count 15: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email distributed on October 15, 2018, in violation of Government Code Section 84305, subdivision (c)(1).
- Count 16: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email distributed on October 26, 2018, in violation of Government Code Section 84305, subdivision (c)(1).
- Count 17: The 2018 Committee and Grasha failed to include the proper disclosure on a mass email distributed on November 4, 2018, in violation of Government Code Section 84305, subdivision (c)(1).
- Count 18: Grasha failed to timely disclose income and interests in real property on the Candidate Statement of Economic Interests, in violation of Government Code Section 87302.3.
- Count 19: The 2022 Committee and Grasha failed to timely file a statement of organization with the Secretary of State, due within 10 days of qualifying as a recipient committee, in violation of Government Code Section 84101.

- Count 20: The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a \$10,000 contribution received on or about August 31, 2022 by the due date of or about September 1, 2022, in violation of Government Code Section 84203.
- Count 21: The 2022 Committee and Grasha failed to timely file the first pre-election campaign statement for the reporting period of July 1, 2022 through September 24, 2022 by the September 29, 2022 due date, in violation of Government Code Sections 84200.5 and 84200.8.
- Count 22: The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a \$5,000 contribution received on October 7, 2022 by the October 10, 2022 due date, in violation of Government Code Section 84203.
- Count 23: The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a second \$5,000 contribution received on October 7, 2022 by the October 10, 2022 due date, in violation of Government Code Section 84203.
- Count 24: The 2022 Committee and Grasha failed to timely file the first pre-election campaign statement for the reporting period of September 25, 2022 through October 22, 2022 by the October 27, 2022 due date, in violation of Government Code Sections 84200.5 and 84200.8.
- Count 25: The 2022 Committee and Grasha failed to timely file a 24-hour contribution report for a \$5,000 contribution received on November 3, 2022 by the November 4, 2022 due date, in violation of Government Code Section 84203.
- Count 26: The 2022 Committee and Grasha failed to timely file a semi-annual campaign statement for the reporting period of October 23, 2022 through December 31, 2022 by the January 31, 2023 due date, in violation of Government Code Section 84200.
- Count 27: The 2022 Committee and Grasha failed to include the proper advertisement disclosure on its Facebook and Twitter landing pages, in violation of Government Code Section 84504.4, subdivision (b).
- Count 28: The 2022 Committee and Grasha failed to provide the online platform with the required information for six online platform disclosed advertisements, resulting in incorrect advertisement disclosures, between September 30, 2022 and October 8, 2022, in violation of Government Code Section 84504.6 subdivision (b).
- Count 29: The 2022 Committee and Grasha failed to provide the online platform with the required information for nine online platform disclosed advertisements, resulting in incorrect advertisement disclosures, between October 9, 2022 to October 27, 2022, in violation of Government Code Section 84504.6 subdivision (b).

- Count 30: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing distributed on or about October 6, 2022, in violation of Government Code Section 84305.
- Count 31: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing distributed on or about October 17, 2022, in violation of Government Code Section 84305.
- Count 32: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing distributed on or about October 21, 2022, in violation of Government Code Section 84305.
- Count 33: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing distributed on or about October 28, 2022, in violation of Government Code Section 84305.
- Count 34: The 2022 Committee and Grasha failed to include the proper disclosure on a mass mailing distributed on or about November 1, 2022, in violation of Government Code Section 84305.

In the Matter of Damian Morgan, Case No. 2022-00075. On June 28, 2024, probable cause was found, on the papers, that Respondent committed the following violations of the Act:

- Count 1: Morgan failed to timely file his 2019 Annual SEI by the June 1, 2020 due date, in violation of Government Code Section 87300.
- Count 2: Morgan failed to timely file his 2020 Annual SEI by the April 1, 2021 due date, in violation of Government Code Section 87300.
- Count 3: Morgan failed to timely file his 2021 Annual SEI by the April 1, 2022 due date, in violation of Government Code Section 87300.
- Count 4: Morgan failed to timely file his Leaving Office SEI by the September 12, 2022 due date, in violation of Government Code Section 87300.

IV. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: JUE WANG, CHIEF OF ADMINISTRATION

A. New Employee Report

Enforcement Division

Victoria Cichy, Special Investigator
Joselyn Soto, Associate Governmental Program Analyst
Franceska Gonzalez, Attorney/FPPC Counsel

Audit Division

Clara Rios, Office Technician

Administration Division

Angel Moreno, Personnel Specialist

B. Hiring Process

Enforcement Division

Attorney III
Management Services Technician

Legal Division

Attorney
Staff Services Analyst

Administration Division

Information Technology Associate
Staff Services Manager I
Staff Services Analyst

C. Statement of Economic Interest (SEI, Form 700)

April 2 Filing Status

As of July 31, 2024, 15,538 2023 annual statements, representing approximately 97% of the total, have been received and processed. There are 441 non-filers. The first non-filer letters were sent out on July 1, 2024, and the second ones will be sent out during the first week of August.

SEI Unit June and July Summary

- Referred 12 cases to the Enforcement
- Issued 34 fine letters
- Issued 833 Non-filer letters and 18 Amendment letters
- Processed 14 Form 462
- Responded 3894 emails from form700@fppc.ca.gov
- Re-certified 28 existing local e-filing systems

D. Collection/Revenue

2023-2024 Report of Collection				
Category	Check	Credit Card	FTB Offset	Total
SEI Filing Fee	\$ 37,000	-	-	\$ 37,000.00
SEI Fine	\$ 9,900	\$ 35,206.18	\$ 5,408.31	\$ 50,514.49
PREP	\$ 150	\$ 3,300	-	\$ 3,450.00
Enforcement Collection	\$ 14,525	\$ 6,361.48	\$ 14,826.08	\$ 35,712.56
Enforcement Stipulations	\$ 300,248	\$ 105,613	-	\$ 405,861.00
Other Reimb	\$ 6,896.96	-	\$ 356	\$ 7,252.96
Total	\$ 368,719.96	\$ 150,480.66	20,590.39	\$ 539,791.01

July Report of Collection				
Category	Check	Credit Card	FTB Offset	Total
SEI Filing Fee	\$ 6,000	-	-	\$ 6,000
SEI Fine	\$ 100	\$ 900	\$ 137	\$ 1,137
PREP	\$ 51.50	\$ 600	-	\$ 651.50
Enforcement Collections	-	-	-	-
Enforcement Stipulations	\$ 10,200	\$ 3,221	-	\$ 13,421
Other Reimb	\$ 55,200	-	-	\$ 55,200
Total	\$ 71,551.50	\$ 4,721.00	\$ 137	\$ 76,409.50