



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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EXECUTIVE STAFF REPORTS

June 19, 2025, Commission Hearing

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I. ENFORCEMENT DIVISION

STAFF: ANGELA J. BRERETON & CHRISTOPHER B. BURTON, ASSISTANT CHIEFS OF ENFORCEMENT

A. Overview

During the period of May 1, 2025, through May 31, 2025, the Enforcement Division received the following complaints and referrals:

| | Sworn | Non-Sworn | Anonymous | Referrals |
|-----------------|-------|-----------|-----------|-----------|
| Number Received | 28 | 5 | 26 | 61 |

The number of complaints and referrals received by the Enforcement Division decreased considerably compared with the previous month.

For the month of May, more time to respond beyond the 14-day statutory period was needed for approximately 13 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 month of May, the Enforcement Division opened 131 cases, rejected 91 complaints and referrals, and closed a total of 99 cases including:

- 66 warning letters –statement of economic interests violations (60), campaign violations (4), conflict of interest violations (1), and gift-over-the-limit violations (1);
- 11 no action closure letters: PREP completed – statement of economic interests violations (10) and campaign violations (1);
- 10 no action closure letters alleging – advertisement violations (1), conflict of interests violations (1), and statement of economic interests violations (8);
- 9 approved stipulations from the May Commission meeting;
- 3 administrative terminations.

The Division had a total of 886 cases in various stages of resolution at the time of the May Monthly Report and currently has approximately 918 cases in various stages of resolution, including the 4 streamline, 4 mainline, and 2 pre-notice default cases before the Commission as listed in the June Agenda. Net case openings since the last monthly report totaled 32.

B. Annual Statistics

The following is a chart that details the annual statistics for enforcement complaints, referrals and cases over the past six years. The statistics show a marked increase in complaints during election years while referrals were reduced in 2024.

| | Year | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 |
|----|---|-----------|-------------|-----------|-----------|-----------|-----------|
| 1 | Complaints Received | 744 | 1,390 | 606 | 1,379 | 653 | 1,456 |
| 2 | Referrals Received | 1,950 | 1,518 | 1,751 | 1,724 | 1,971 | 1,393 |
| 3 | Total Complaint and Referrals Received | 2,694 | 2,908 | 2,357 | 3,103 | 2,624 | 2,849 |
| 4 | Cases opened | 1,820 | 1,155 | 1,185 | 990 | 831 | 1,403 |
| 5 | Cases closed ³ | 1,465 | 1,526 | 1,058 | 1,075 | 1,295 | 1,536 |
| 6 | Cases with penalties ¹ | 343 | 278 | 269 | 161 | 98 | 149 |
| | a Streamline cases | 263 | 194 | 234 | 142 | 79 | 117 |
| | b Mainline cases | 73 | 77 | 32 | 14 | 17 | 25 |
| | c Default cases | 7 | 7 | 3 | 5 | 2 | 7 |
| 7 | Total fines imposed | \$797,384 | \$1,940,107 | \$472,248 | \$617,548 | \$376,531 | \$802,238 |
| 8 | Warning letters issued | 584 | 777 | 475 | 681 | 813 | 847 |
| 9 | Administrative terminations | 104 | 62 | 59 | 53 | 87 | 80 |
| 10 | Cases closed with violations found ² | 1,031 | 1,117 | 803 | 895 | 998 | 1,076 |

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.

| | | | | | | | |
|----|---------------------------|-----|-----|-----|-----|-----|-----|
| 11 | Advisory letters issued | 9 | 7 | 16 | 8 | 15 | 12 |
| 12 | No action closure letters | 423 | 402 | 237 | 217 | 296 | 469 |
| | a PREP Completed | -- | -- | -- | 39 | 86 | 261 |

C. 2024-2025 Quarterly Caseload Summary

The following is a chart that compares the number of cases from given years at the end of each quarter during 2024 and 2025. Enforcement has successfully focused on the resolution of older cases.

| | March 2024 | June 2024 | September 2024 | December 2024 | March 2025 | Difference in Existing Caseload Overall |
|------|------------|-----------|----------------|---------------|------------|---|
| 2018 | 12 | 8 | 8 | 5 | 3 | -9 |
| 2019 | 23 | 22 | 21 | 12 | 11 | -12 |
| 2020 | 118 | 103 | 84 | 40 | 24 | -94 |
| 2021 | 148 | 124 | 105 | 68 | 54 | -94 |
| 2022 | 213 | 191 | 165 | 131 | 119 | -94 |
| 2023 | 276 | 260 | 236 | 194 | 171 | -105 |
| 2024 | -- | -- | -- | -- | 318 | -- |

D. Presentations

On May 19, 2025, Supervising Special Investigator Lance Hachigian and Commission Counsel Simon Russell participated in a presentation on conflicts of interest to the California District Attorneys Association in San Diego.

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 18360.3.

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 18360.1(e)(6)(C)(ii), 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.

Campaign Late Filer/Reporter

In the Matter of Christine Nagaye for Sheriff 2022, Christine Nagaye, & Gregory Nagaye; FPPC No. 22/790. Staff: Laura Columbel, Commission Counsel and Kristin Hamilton, Special Investigator. Christine Nagaye was an unsuccessful candidate for Santa Clara Sheriff in the June 7, 2022 Primary Election. Christine Nagaye for Sheriff 2022 was Nagaye's candidate-controlled committee. Gregory Nagaye served as the Committee's treasurer. The Committee, Christine Nagaye, and Gregory Nagaye failed to timely file an Amended Statement of Organization, in violation of Government Code Section 84101 (1 count); two pre-election campaign statements, in violation of Government Code Section 84200.5 (2 counts); six semi-annual campaign statements, in violation of Government Code Section 84200 (6 counts); and one 24-Hour Report, in violation of Government Code Section 84203 (1 count). The Committee, Christine Nagaye, and Gregory Nagaye also failed to timely report expenditures and loan repayments on one semi-annual campaign statement, in violation of Government Code Section 84211 (1 count). **Total Penalty: \$2,058 (Tiers One & Two).**

In the Matter of California Association of Highway Patrolmen PAC and J. Richard Eichman; FPPC No. 23/727. Staff: Bridgette Castillo, Senior Commission Counsel. This matter arose from an audit performed by the Franchise Tax Board's Political Reform Audit Program. California Association of Highway Patrolmen PAC was a state general purpose committee. At all relevant times, J. Richard Eichman was the Committee's treasurer. The Committee and Eichman failed to timely disclose a contribution in the amount of \$68,943 received on a semi-annual campaign statement, in violation of Government Code Section 84211 (1 count). **Total Penalty: \$1,979 (Tier Two).**

Statement of Economic Interests Late Filer/Reporter

In the Matter of Tom Pier; FPPC No. 25/438. Staff: Christopher B. Burton, Assistant Chief of Enforcement and Amber Rodriguez, Staff Services Analyst. Tom Pier, a Boating and Waterways Commission Member for the Parks and Recreation Department, failed to timely file the 2023 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Penalty: \$200 (Tier One).**

In the Matter of Michele Sherer; FPPC No. 25/498. Staff: Christopher B. Burton, Assistant Chief of Enforcement and Fela Williams, Staff Services Analyst. Michele Sherer, a Program Manager of Special Education for the Milpitas Unified School District, failed to timely file the 2023 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Penalty: \$200 (Tier One).**

II. AUDITS & ASSISTANCE DIVISION

STAFF: SHRDHA SHAH, CHIEF OF AUDITS & ASSISTANCE

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 May 1, 2025, to May 31, 2025, the Audits and Assistance Division adopted one audit report, with no findings. Currently, the team has 51 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.

Details of the audit adopted are as follows:

- **Committee to Elect Theodore Sanchez City Council 2022 (ID# 1391532)**

No findings noted.

III. LEGAL DIVISION

STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

None.

B. Outreach and Training

Webinars & Workshops

- May 6, the FPPC presented a Statement of Economic Interests Filers workshop requested by the California State Sheriffs' Association. Political Reform Consultant, Stephen Hernandez, and Telephone Advice & Education Outreach Manager, Vanessa Manriquez, presented. Eight people attended.
- May 13, the FPPC presented a Campaign/Treasurer Getting Started webinar. Political Reform Consultants Katie Ito and Alex Castillo, presented. 44 people attended.
- May 21, the FPPC presented a Form 460/497 webinar. Political Reform Consultants Alex Castillo and Stephen Hernandez, presented. 27 people attended.
- May 29, the FPPC presented a Campaign/Treasurer After Election webinar. Political Reform Consultants Stephen Hernandez and Katie Ito, presented. 24 people attended.

Scheduled Webinars

- June 6, the FPPC is presenting a Campaign/Treasurer webinar.
- June 17, the FPPC is presenting a Campaign Filing Officer webinar.
- June 26, the FPPC is presenting a Form 460/497 webinar.

Video Tutorials: Commission video tutorials were accessed a total of 328 times in May. Form 700 videos were accessed 184 times, the Candidate/Treasurer video was accessed 71 times, and the filing officer videos were accessed 73 times.

C. New and Updated Educational Resources

None.

D. Political Reform Education Program (PREP):

| Course | Referrals Received | Completions | Failures to Complete | Current Enrollments |
|--|--------------------|-------------|----------------------|---------------------|
| Statement of Economic Interests Course | 19 | 11 | 0 | 24 |
| Campaign Course for Local Candidates and Candidate-Controlled Committees | 4 | 1 | 0 | 5 |
| Campaign Course for State Candidates and Candidate-Controlled Committees | 0 | 0 | 0 | 0 |
| Advertisement Course for Candidates and Candidate-Controlled Committees | 1 | 0 | 0 | 1 |

E. Advice

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

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

- **Telephone:** The Education unit responded to 266 requests for technical assistance via telephone.
- **Email Advice:** Political Reform Consultants and Legal Division attorneys collectively responded to 430 email requests for advice, 322 of which were responded to within 24 hours, and 351 of those were responded to within 48 hours.
- **PRA Advice Letters:** The Legal Division received 18 advice letter requests under the Political Reform Act and completed 16.
- **Section 1090 Letters:** The Legal Division received 3 advice letter requests concerning Section 1090 and completed 8.

F. Miscellaneous Decisions

None.

G. Upcoming Regulation Projects

August

Committee Termination and Reopening Procedures – Amend Regulations 18404 and 18404.1 to clarify committee termination procedures and adopt new Regulation 18404.3 to clarify committee reopening procedures as well as to address the termination/reopening procedures related to the return or reimbursement of a security system or item paid for with campaign funds required by AB 2041. (Pre-notice)

Limitations on Prepaid Cards and Recordkeeping Requirements for Contract Vendors – New Regulation 18430.1 adding prohibitions and limitations on contributions and expenditures using prepaid cards, amendments to Regulation 18421.3 prohibiting candidates or committees from contracting with payment processors that do not utilize more stringent verification measures, and amendments to Regulation 18401 adding recordkeeping requirements relating to contributions received through payment processors. (Adoption)

Notice of Attribution of Contributions – New provision requiring a candidate-controlled committee that transfers funds to another committee subject to attribution requirements to provide notice to the contributor to whom a contribution was attributed. (Pre-notice)

September

Probable Cause Proceedings – Amend the existing PC regulation to make the process more efficient and lessen unnecessary delays in conducting probable cause proceedings. (Pre-notice)

October

Behested Payment Reporting – Adopt new regulations and/or amend existing regulations to codify existing advice, define statutory terms, and establish when general requests for payments trigger reporting requirements. (Pre-notice)

Notice of Attribution of Contributions – New provision requiring a candidate-controlled committee that transfers funds to another committee subject to attribution requirements to provide notice to the contributor to whom a contribution was attributed. (Adoption)

Committee Termination and Reopening Procedures – Amend Regulations 18404 and 18404.1 to clarify committee termination procedures and adopt new Regulation 18404.3 to clarify committee reopening procedures as well as to address the termination/reopening procedures related to the return or reimbursement of a security system or item paid for with campaign funds required by AB 2041. (Adoption)

H. Conflict of Interest Codes

Adoptions and Amendments

State Agencies

- Board of Pilot Commissioners for the Bays of San Francisco, San Pablo, and Suisun

Multi-County Agencies

- Local Agency Workers' Compensation Excess Joint Powers Authority
- Eel-Russian Project Authority
- CA Joint Powers Insurance Authority
- Mayers Memorial Hospital District
- South Tahoe Public Utility District
- Employer's Training Resource
- Grassland Basin Authority
- San Bernardino Community College District
- Southern California Public Power Authority
- Pajaro Valley Health Care District
- Lassen Community College District
- Allan Hancock Community College District

Exemptions

None

Extensions

None

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 Michael Pettibone, Case No. 2024-01136. On May 7, 2025, probable cause was found, on the papers submitted, to believe that Respondent committed the following violations of the Act:

Count 1: Pettibone failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of Government Code Section 87300.

In the Matter of Margaret Fernandez, Case No. 2024-00354. On May 20, 2025, probable cause was found, on the papers submitted, to believe that Respondent committed the following violations of the Act:

Count 1: Fernandez failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of Government Code Section 87203.

Count 2: Fernandez failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of Government Code Section 87203.

In the Matter of: Kristen Afansev, Case No. 2024-01019. On May 20, 2025, probable cause was found, on the papers submitted, to believe that Respondent Kristen Afansev committed the following violations of the Act:

Count 1: Afansev failed to timely file an Assuming Office SEI by the May 1, 2023, due date in violation of Government Code Section 87300.

Count 2: Afansev failed to timely file a 2023 Annual SEI by the April 2, 2024, due date in violation of Government Code Section 87300.

Count 3: Afansev failed to timely file a 2024 Annual SEI by the April 1, 2025, due date in violation of Government Code Section 87300.

In the Matter of Judy Tyler, Case No. 2024-00810. On May 21, 2025, probable cause was found, on the papers submitted, to believe Respondent committed the following violations of the Act:

Count 1: Tyler failed to timely file an Assuming Office SEI by the May 1, 2023 due date, in violation of Government Code Section 87300.

Count 2: Tyler failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of Government Code Section 87300.

Count 3: Tyler failed to timely file a 2024 Annual SEI by the April 1, 2025 due date, in violation of Government Code Section 87300.

In the Matter of Kevin Kugley for Beverly Hills City Council 2022 and Kevin Kugley, Case No. 2022-00484. On May 27, 2025, probable cause was found, on the papers submitted, to believe that Respondents committed the following violations of the Act:

Count 1: For the calendar year of 2022, the Committee and Kugley failed to maintain supporting records for expenditures made, in violation of Government Code Section 84104.

In the Matter of Committee to Elect Martha Camacho Rodriguez for Senate 2022, and Martha Camacho Rodriguez, Case No. 2022-00534. On June 2, 2025, probable cause was found, on the papers submitted, to believe that Respondents committed the following violations of the Act:

- Count 1: The Committee and Rodriguez failed to timely file an amendment to the Committee's statement of organization within 10 days of qualifying as a committee, in violation of Government Code Section 84103.
- Count 2: The Committee and Rodriguez failed to timely file a pre-election campaign statement for the reporting period of April 24, 2022, through May 21, 2022, by the May 26, 2022, deadline, in violation of Government Code Sections 84200.5 and 84200.8.
- Count 3: The Committee and Rodriguez failed to timely file the semi- annual campaign statement for the reporting period of May 22, 2022, through June 30, 2022, by the August 1, 2022, deadline, in violation of Government Code Sections 84200.
- Count 4: The Committee and Rodriguez failed to timely file the semi- annual campaign statement for the reporting period of January 1, 2023, through June 30, 2023, by the July 1, 2023, deadline, in violation of Government Code Sections 84200.
- Count 5: The Committee and Rodriguez failed to timely file the 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 Sections 84200.
- Count 6: The Committee and Rodriguez failed to timely file the semi- annual campaign statement for the reporting period of January 1, 2024, through July 31, 2024, by the July 31, 2024, deadline, in violation of Government Code Sections 84200.

IV. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: JUE WANG, PhD, CHIEF OF ADMINISTRATION

A. New Employee Report

Legal Division

Mo Roeckl-Navazio, Attorney

B. Hiring Process

Executive Division

Enforcement Division Chief

Legal Division

Attorney

Political Reform Consultant

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

April 1 (June 2) Filing Status

As of June 4, 2025, 16,465 2024 annual statements—approximately 97.35% of the total 16,931—had been received and processed. The second non-filer letters for the April 1 group were sent out on June 3, 2025, and the first non-filer letters for the June 2 group were sent out on June 4, 2025.