



EXECUTIVE STAFF REPORTS

November 20, 2025, Commission Hearing

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I. ENFORCEMENT DIVISION

STAFF: KENDALL L.D. BONEBRAKE, CHIEF OF ENFORCEMENT

A. Overview

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

	Sworn	Non-Sworn	Anonymous	Referrals
Number Received	45	17	30	56

The number of complaints received by the Enforcement Division in October decreased compared with the previous month. The number of referrals received by the Enforcement Division also decreased.

For the month of October, more time to respond beyond the 14-day statutory period was needed for approximately 22 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 October, the Enforcement Division opened 94 cases, rejected 88 complaints and referrals, and closed a total of 105 cases including:

- 71 warning letters –advertisement violations (2), behested payment violations (1), statement of economic interests violations (61) and campaign violations (7)
- 10 no action closure letters: PREP completed – advertisement violations (1), statement of economic interests violations (6) and campaign violations (3);
- 10 no action closure letters alleging – conflict of interests (1), advertisement violations (1), campaign violations (1), and statement of economic interests violations (7);
- 7 approved stipulations from the September and October Commission meetings;
- 7 administrative terminations;

The Division had a total of 908 cases in various stages of resolution at the time of the October Monthly Report and currently has approximately 897 cases in various stages of resolution, including the 8 streamline, 3 mainline, and 2 pre-notice default cases before the Commission as listed in the November Agenda. Net case closings since the last monthly report totaled 11.

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
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

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. 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.

	September 2024	December 2024	March 2025	June 2025	September 2025	Difference in Existing Caseload Overall
2018	8	5	3	1	1	-7
2019	21	12	11	8	8	-13
2020	84	40	24	14	11	-73
2021	105	68	54	42	33	-72
2022	165	131	119	104	91	-74
2023	236	194	171	154	148	-88
2024	--	--	318	295	270	-48

D. Presentations

None.

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 Bank Account

[In the Matter of Antonio Lopez and Committee to Elect Antonio Lopez for East Palo Alto City Council 2020; FPPC No. 21/266](#). Staff: Jenna C. Rinehart, Senior Commission Counsel, and Roone Petersen, Special Investigator. Antonio Lopez was a successful candidate for East Palo Alto City Council in the November 3, 2020 General Election. Committee to Elect Antonio Lopez for East Palo Alto City Council 2020 was Lopez's candidate-controlled committee. The Committee and Lopez failed to timely file two semi-annual campaign statements, in violation of

Government Code Section 84200 (2 counts), a terminating Statement of Organization, in violation of Government Code Section 84103 (1 count), and three Form 470s, in violation of Government Code Section 84206 (3 counts). Additionally, the Committee and Lopez failed to timely disclose certain expenditures on two pre-election campaign statements and one semi-annual campaign statement, in violation of Government Code Section 84211 (3 counts), made expenditures in cash of \$100 or more, in violation of Government Code Section 84300 (2 counts), failed to process \$4,500 through the campaign bank account, in violation of Government Code Section 85201 (1 count), and failed to maintain adequate campaign records, in violation of Government Code Section 84104 (1 count). **Total Penalty: \$1,263 (Tiers One & Two).**

Advertisements

In the Matter of Kevin Kugley for Beverly Hills City Council 2022 and Kevin Kugley; FPPC No. 22/484. Staff: Laura Columbel, Commission Counsel and Kaitlin Osborn, Special Investigator. Kevin Kugley was an unsuccessful candidate in the June 7, 2022 Primary Election. Kevin Kugley for Beverly Hills City Council 2022 was Kugley's candidate-controlled committee. The Committee and Kugley failed to include the proper advertisement disclosure in an email, in violation of Government Code Section 84305 (1 count). **Total Penalty: \$406 (Tier One).**

Campaign Late Filer/Reporter

In the Matter of Friends of Fred Docdocil for Carson City Council 2022, Fred Docdocil, and Jesus Alex Cainglet; FPPC No. 23/310. Staff: Jaleena Evans, Commission Counsel. Fred Docdocil was an unsuccessful candidate for Carson City Council in the November 8, 2022 General Election. Friends of Fred Docdocil for Carson City Council 2022 was Docdocil's candidate-controlled committee. Jesus Alex Cainglet served as the committee's treasurer. The Committee and Cainglet failed to timely file an amended Statement of Organization upon qualifying as a committee, in violation of Government Code Section 84101 (1 count), failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count), failed to timely file six 24-Hour Reports, in violation of Government Code Section 84203 (6 counts), failed to timely file three semi-annual campaign statements, in violation of Government Code Section 84200 (3 counts), and failed to timely report a contribution on a pre-election campaign statement, in violation of Government Code Section 84211 (1 count). **Total Penalty: \$3,748 (Tiers One and Two).**

Statement of Economic Interests Late Filer/Reporter

In the Matter of Charles Martin III; FPPC No. 25/388. Staff: Kristin E. Goulet, Commission Counsel. Charles Martin III, a Commissioner for the California Apprenticeship Council, failed to timely file the 2023 and 2024 Annual Statements of Economic Interests, in violation of Government Code Section 87300 (2 counts). **Total Penalty: \$400 (Tier One).**

In the Matter of Jose Aranda; FPPC No. 25/943. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Staff Services Analyst. Jose Aranda, a former Planning Commissioner and current City Council Member for the City of San Juan Bautista and a Member

of the Board of Directors for the Association of Monterey Bay Area Governments, failed to timely file a Leaving Office and two Assuming Office Statements of Economic Interests, in violation of Government Code Sections 87202 and 87204 (3 counts). **Total Penalty: \$400 (Tier One).**

In the Matter of Kevin DeHaan; FPPC No. 25/967. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Staff Services Analyst. Kevin DeHaan, an Independent Citizens Oversight Committee Member for the San Dieguito Union High School District, failed to timely file a 2024 Annual and Leaving Office Statement of Economic Interests, in violation of Government Code Section 87300 (2 counts). **Total Penalty: \$200 (Tier One).**

Gift Over-the-Limit

In the Matter of Julian Miranda; FPPC No. 25/1005. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Cole Smith, Political Reform Consultant. Julian Miranda, as City Manager of the City of Irwindale, accepted gifts from a single source in excess of the gift limit for the calendar years 2023 and 2024, in violation of Government Code Section 89503 (1 count). **Total Proposed Penalty: \$800 (Tier Two).**

In the Matter of Sonia De La Rosa; FPPC No. 25/927. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Vanessa Greer, Political Reform Consultant. Sonia De La Rosa, County Administrative Officer of the County of Monterey, accepted a gift in excess of the applicable annual gift limit, in violation of Government Code Section 89503 (1 count). **Total Penalty: \$800 (Tier Two).**

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 October 1, 2025, to October 31, 2025, the Audits and Assistance Division adopted one audit report, with findings. Currently, the team has 49 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.

Details of the audit report adopted are as follows:

- **Jim Beall for Board of Equalization 2022 (ID# 1410037)**

- **Finding 1: Form 497 Contribution Report Not Filed**

A Form 497 Contribution Report was not filed with the Secretary of State for one contribution made totaling \$10,000 to the California Democratic Party (ID# 741666). The California Democratic Party (ID# 741666) reported receiving this contribution on November 13, 2018 on their Form 460 Semi-annual Statement filed for the period ending December 31, 2018. Reports were timely filed for 12 other contributions made totaling \$89,000.

- **Finding 2: General Election Contributions Not Returned to Contributors**

Four monetary contributions received totaling \$23,012 designated for the 2022 General Election were not returned following the 2022 Primary Election, as the Candidate was not on the ballot for the 2022 General Election. The funds were to be returned prior to 90 days after the post-election reporting period following the election in which the Candidate withdrew. The Candidate withdrew from the June 7,

2022 Primary Election and the end of the post-election reporting period was June 30, 2022, therefore surplus 2022 General Election funds should have been returned by September 28, 2022. However, the Committee terminated on December 31, 2020 and the \$23,012 in General Election contributions were not returned to contributors.

C. Public Draw

A public draw will be held in December 2025 to select General Purpose Committees. The date of the public draw will be announced on our Draw webpage at

<https://www.fppc.ca.gov/transparency/audit-program/drawing-schedule---results/public-draw.html>.

III. LEGAL DIVISION

STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

None.

B. Outreach and Training

Webinars & Workshops

- October 8, the FPPC presented a Statement of Economic Interests Filers webinar. Political Reform Consultants Kathryn Ito and Alexandra Miner, presented. 52 people attended.
- October 14, the FPPC presented a Completing Campaign Forms 460/497 webinar. Political Reform Consultants Alexandra Miner and Stephen Hernandez, presented. 48 people attended.
- October 22, the FPPC presented a Candidate/Treasurer – After the Election webinar. Political Reform Consultants Stephen Hernandez and Kathryn Ito, presented. 20 people attended.
- October 29, the FPPC presented a Statement of Economic Interest Filers and Conflict of Interest webinar requested by the City of San Bernardino. Commission Counsel, Toren Lewis, and Political Reform Consultants, Alexandra Miner and Kathryn Ito, presented. 9 people attended.

Scheduled Webinars

- November 18, the FPPC is presenting a Statement of Economic Interests Filers webinar.
- November 19, the FPPC is presenting a Campaign Filing Officer – After the Election webinar.

Video Tutorials: Commission video tutorials were accessed a total of 292 times in October. Form 700 videos were accessed 181 times, the Candidate/Treasurer video was accessed 71 times, and the filing officer videos were accessed 40 times.

C. New and Updated Educational Resources

- Updated [Lobbying Frequently Asked Questions FAQ Fact Sheet](#)
- Updated [Inauguration Events Frequently Asked Questions FAQ Fact Sheet](#)

D. Political Reform Education Program (PREP):

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments	Withdrawals
Statement of Economic Interests Course	20	10	3	46	1
Campaign Course for Local Candidates and Candidate-Controlled Committees	5	4	0	8	0
Campaign Course for State Candidates and Candidate-Controlled Committees	0	0	0	0	0
Advertisement Course for Candidates and Candidate-Controlled Committees	2	0	0	3	0

E. Advice

The [October 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 October, the Legal Division responded to the following requests for advice:

- **Telephone:** The Education unit responded to 271 requests for technical assistance via telephone.
- **Email Advice:** Political Reform Consultants and Legal Division attorneys collectively responded to 450 email requests for advice, 338 of which were responded to within 24 hours and 364 were responded to within 48 hours.
- **PRA Advice Letters:** The Legal Division received 8 advice letter requests under the Political Reform Act and completed 9.
- **Section 1090 Letters:** The Legal Division received 4 advice letter requests concerning Section 1090 and completed 2.

F. Miscellaneous Decisions

Regulation 18740 provides that an official or candidate is not required to disclose the name of a source of income on their Statement of Economic Interest if disclosure would violate California or Federal law. The following exemptions were approved in October:

- Shari Slate, CalPERS, is exempt from disclosing, as sources of income, the names of patients of her spouse's medical practice pursuant to the federal Health Insurance Portability and Accountability Act (HIPAA).
- Joe Stapleton, Mayor, City of Newport Beach, is exempt from disclosing, as sources of income, the names of clients of his investment and tax advising business pursuant to the federal Securities and Exchange Commission Privacy of Consumer Financial Information regulations.

G. Upcoming Regulation Projects

January

Enforcement Penalties – Amend “streamline” regulations to clarify Enforcement’s discretion to offer streamline settlements for violations that do not otherwise qualify for a reduced penalty, require the Commission to directly approve streamline fines, and consider existing inclusions and exclusion criteria. (Pre-notice)

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

H. Conflict of Interest Codes

Adoptions and Amendments

State Agencies

- Department of General Services
- California Arts Council
- Office of Data and Innovation
- State Personnel Board

Multi-County Agencies

- Westside Water Authority for signature
- Capital Area Regional Tolling Authority
- Bay Area Clean Air Foundation
- Peninsula Corridor Joint Powers Board
- Kingsburg Union High School District
- Los Gatos-Saratoga Union High School District

Repeals

None

Exemptions

- Fresno County Self Insurance Group
- Organization of Self-insured Schools Joint Power Authority

Extensions

- State of Hate Commission

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 that 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 Erik Lutz, Case No. 2024-00630. On October 1, probable cause was found, on the papers submitted, to believe that Respondent committed the following violations of the Act:

- Count 1: Lutz failed to timely file a 2021 Annual SEI by the April 1, 2022 due date for his position as City Council Member of Pico Rivera, in violation of Government Code section 87203.
- Count 2: Lutz failed to timely file a 2021 Annual SEI by the April 1, 2022 due date for his position as Alternate Commission Member of the Southeast Area Animal Control Authority, in violation of Government Code Section 87300.
- Count 3: Lutz failed to timely file a 2022 Annual SEI by the April 3, 2023 due date for his position as City Council Member of Pico Rivera, in violation of Government Code Section 87203.
- Count 4: Lutz failed to timely file a 2022 Annual SEI by the April 3, 2023 due date for his position as Alternate Commission Member of the Southeast Area Animal Control Authority, in violation of Government Code Section 87300.
- Count 5: Lutz failed to timely file a 2023 Annual SEI by the April 2, 2024 due date for his position as City Council Member of Pico Rivera, in violation of Government Code Section 87203.
- Count 6: Lutz failed to timely file a 2023 Annual SEI by the April 2, 2024 due date for his position as Alternate Commission Member of the Southeast Area Animal Control Authority, in violation of Government Code Section 87300.

Count 7: Lutz failed to timely file an Assuming Office SEI by the November 22, 2023 due date, in violation of Government Code Section 87300.

Count 8: Lutz failed to timely file a 2024 Annual SEI by the June 2, 2025 due date for his position as an Alternate Commission Member of the Southeast Area Animal Control Authority, in violation of Government Code section 87300.

IV. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: JUE WANG, PhD, CHIEF OF ADMINISTRATION

A. New Employee Report

None.

B. Hiring Process

Legal Division

Attorney
Political Reform Consultant

Enforcement Division

Special Investigator
Attorney Supervisor

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

2025 Year-to-Date E-Filing Summary

As of November 5, 2025, 25,772 annual, assuming office, leaving office, and candidate statements filed using the FPPC's E-filing system.

Entity	Annual	Assuming	Leaving	Candidate	Total
Cities A - M	3,205	746	546	15	4,512
Cities N - Z	2,418	549	418	29	3,414
Constitutional officers	59	12	14	0	85
Counties	794	174	129	5	1,102
Courts	2,297	126	98	0	2,521
Groundwater Sustainability Agency	1,525	184	93	0	1,802
Keenan	18	1	1	0	20
Legislative Staffers	1,541	383	310	0	2,234

Legislature	118	3	11	17	149
Multi-County Agencies	4,465	1098	798	0	6,361
State Agencies	2,802	459	310	1	3,572
Total	19,242	3,735	2,728	67	25,772

SEI Unit October 2025 Summary

- Referred 9 cases to the Enforcement
- Issued 49 fine letters
- Issued 137 Non-filer letters and 26 Amendment letters
- Processed 47 Form 462
- Responded 2056 emails from form700@fppc.ca.gov and 60 phones calls
- Re-certified 4 existing local e-filing systems

D. Collection/Revenue

July 2025 – October 2025 Report of Collection

Category	Check	Credit Card	FTB Offset	Total
SEI Filing Fee	\$ 11,000	-	-	\$ 11,000
SEI Fine	\$ 1,800	\$ 13,874	\$ 1,100	\$ 16,774
PREP	-	\$ 6,450	-	\$ 6,450
Enforcement Collection	\$ 500	-	\$ 235	\$ 735
Enforcement Stipulations	\$ 41,916	\$ 21,060	-	\$ 62,976
Reimbursement	\$ 212,349	-	-	\$ 212,349
Total	\$ 267,565	\$ 41,384	\$ 1,335	\$ 310,284