1 2 3 4 5 6 7 8	GALENA WEST Chief of Enforcement JENNA C. RINEHART Commission Counsel FAIR POLITICAL PRACTICES COMMISS 1102 Q Street, Suite 3000 Sacramento, CA 95811 Telephone: (916) 323-6302 Email: JRinehart@fppc.ca.gov  Attorneys for Complainant Enforcement Division of the Fair Political Practic	ces Commission
9		ICAL PRACTICES COMMISSION
10	STATE O	F CALIFORNIA
11	In the Matter of:	FPPC Case No. 18/179
12	GREG RODRIGUEZ FOR 42ND	STIPULATION, DECISION AND ORDER
13	STATE ASSEMBLY, 2016 AND GREG RODRIGUEZ,	
14	Respondents.	
15	respondents.	
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17	INTR	ODUCTION
18	Respondent, Greg Rodriguez ("Rodriguez"), was successful in his bid for State Assembly for the	
19	42nd District in the June 7, 2016, primary election, but was defeated in the November 8, 2016, general	
20	election. Respondent, Greg Rodriguez for 42nd State Assembly, 2016 (the "Committee") (ID#	
21	1375843), was Rodriguez's controlled committee.	
22	The Committee was the subject of a Franchise Tax Board ("FTB") audit. The FTB audit report	
23	covered the audit period of January 1, 2015 through December 8, 2016. During the audit period, the	
24	Committee reported receiving contributions of approximately \$222,802 and making expenditures of	
25	approximately \$222,802. The FTB audit revealed Rodriguez and the Committee committed several	
26	violations of the Political Reform Act (the "Act"). The Act requires candidates and committees to	
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28	<sup>1</sup> The Political Reform Act – sometimes simply referred to as the Act – is contained in Government Code sections 81000 through 91014. All statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to	
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maintain detailed campaign records, file 24-hour contribution reports, and to report contributor information. Rodriguez and the Committee violated the Act by failing to maintain detailed campaign records of contributions received and expenditures made, failing to file 24-hour contribution reports for late contributions received, and failing to report required contributor information on campaign statements.

#### **SUMMARY OF THE LAW**

The Act and its regulations are amended from time to time. The violations in this case occurred in 2015 and 2016. For this reason, all legal references and discussions of law pertain to the Act's provisions as they existed at that time.

#### Need for Liberal Construction and Vigorous Enforcement of the Political Reform Act

When enacting the Act, the people of California found and declared that previous laws regulating political practices suffered from inadequate enforcement by state and local authorities.<sup>2</sup> Thus, it was decreed the Act "should be liberally construed to accomplish its purposes.<sup>3</sup> A central purpose of the Act is to promote transparency by ensuring that receipts and expenditures in election campaigns are fully and truthfully disclosed so that voters are fully informed and improper practices are inhibited.<sup>4</sup> Another purpose of the Act is to provide adequate enforcement mechanisms so that the Act will be "vigorously enforced."<sup>5</sup>

#### Recordkeeping

It shall be the duty of each candidate and treasurer to maintain detailed accounts, records, bills, and receipts necessary to prepare campaign statements and to establish that campaign statements were properly filed.<sup>6</sup> A filer shall maintain the accounts, records, bills and receipts, and original source documentation for a period of four years following the date the campaign statement to which they relate is filed.<sup>7</sup>

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this source.

- <sup>2</sup> Section 81001, subdivision (h).
- <sup>3</sup> Section 81003.
- <sup>4</sup> Section 81002, subdivision (a).
- <sup>5</sup> Section 81002, subdivision (f).
- <sup>6</sup> Section 84104.
- <sup>7</sup> Regulation 18401, subdivision (b)(2).

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#### **24-Hour Contribution Report**

A "late contribution" means a contribution that totals in the aggregate \$1,000 or more and is made to or received by a candidate or a controlled committee during the 90-day period preceding the date of the election, at which the candidate is to be voted on.<sup>8</sup> Each candidate or committee that makes or receives a late contribution shall report the late contribution within 24 hours of the time it is made or received.<sup>9</sup> Each candidate or committee that receives a late in-kind or non-monetary contribution shall report the late contribution within 48 hours of the time the contribution is received.<sup>10</sup>

#### **Contents of Campaign Statements**

If the cumulative amount of contributions received from a person is \$100 or more and a contribution has been received from that person during the period covered by the campaign statement, then the campaign statement shall contain the following contributor information: full name; street address; occupation; name of employer; date and amount received; and cumulative amount of contributions. Street address means the street name and building number, and the city, state, and zip code. Code.

#### Joint and Several Liability of Committee and Treasurer

It is the duty of a committee treasurer to ensure the committee complies with the Act. <sup>13</sup> A treasurer may be held jointly and severally liable, along with the committee and candidate, for violations committed by the committee. <sup>14</sup>

#### **Liability for Violations**

Any person who violates any provision of the Act, who purposely or negligently causes any other person to violate any provision of the Act, or who aids and abets any other person in the violation of any provision of the Act, is liable for administrative penalties up to \$5,000 per violation.<sup>15</sup>

<sup>&</sup>lt;sup>8</sup> Section 82036, subdivision (a).

<sup>&</sup>lt;sup>9</sup> Section 84203, subdivisions (a)-(b).

<sup>&</sup>lt;sup>10</sup> Section 84203.3.

<sup>&</sup>lt;sup>11</sup> Section 84211, subdivision (f).

<sup>&</sup>lt;sup>12</sup> Regulation 18421.2.

<sup>&</sup>lt;sup>13</sup> Sections 81004, 84100, and Regulation 18427.

<sup>&</sup>lt;sup>14</sup> Sections 83116. 5 and 91006.

<sup>&</sup>lt;sup>15</sup> Sections 83116 and 83116. 5.

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#### **SUMMARY OF THE FACTS**

The FTB audit found that the filers, in their opinion, did not substantially comply with the disclosure and/or recordkeeping provisions of the Act and related rules and regulations of the Fair Political Practices Commission. The FTB audit period was January 1, 2015 through December 8, 2016. The financial activity for the FTB audit period was \$222,802 received in contributions and spent on expenditures.

#### Failure to Maintain Detailed Campaign Records

The Committee received approximately \$222,802 in contributions during the FTB audit period. The Committee was required to itemize \$212,025 worth of contributions of \$100 or more. Copies of contributors' checks or credit card authorization forms, a daily record showing lump sum amounts, and duplicate deposit slips were not maintained for contributions received totaling \$212,025. Although, Rodriguez retained the Committee's campaign bank statements.

Rodriguez stated in an email to the FTB auditor that he had maintained campaign records, but when he lost the election, he closed the campaign and shredded the records. Rodriguez stated he tried to obtain copies of checks from the bank, but all of the check deposits were done through the cash machine which does not make copies of electronically deposited checks. Rodriguez stated all credit cards were processed online, and he did not have actual credit card slips.

Additionally, the Committee received contributions from an anonymous source(s) as follows:

DATE RECEIVED	AMOUNT
08/12/2016	\$20
09/02/2016	\$51
10/16/2016	\$50
10/31/2016	\$148
11/04/2016	\$330.69
TOTAL:	\$599.69

Rodriguez claims the anonymous contributors donated small cash amounts and did not fill out envelopes to report their names and information. Due to the lack of recordkeeping, we are unable to determine if each of the cash deposits were from a single source and required contributor information to be reported on the Committee's campaign statements.

The Committee spent approximately \$222,802 on expenditures during the FTB audit period. The Committee was required to itemize \$206,921 worth of expenditures of \$100 or more. Of the \$206,921, receipts and/or invoices were not maintained for expenditures made totaling \$206,169, approximately 99.64% (\$206,169 / \$206,921 = 0.99636). Copies of processed checks, bank statements, and a check register were maintained to verify the names of the payees and the amounts paid. Rodriguez claims he maintained receipts and/or invoices for each expenditure but shredded them after he lost the election.

#### Failure to File Three 24-Hour Contribution Reports

The 90-day period preceding the June 7, 2016, primary election, began on March 9, 2016 and ended on June 7, 2016. The 90-day period preceding the November 8, 2016, general election, began on August 10, 2016 and ended on November 8, 2016. The Committee was required to file 24-hour contribution reports with the Secretary of State within 24 hours of receiving a late contribution. The Committee timely filed 24-hour contribution reports for 36 late contributions received totaling \$64,370.

On May 27, 2016, one day late, the Committee filed a 24-hour contribution report and disclosed receiving a \$1,000 late contribution from Jerry Keller. On August 31, 2016, one day late, the Committee filed a 24-hour contribution report and disclosed receiving a \$2,000 late contribution from Democratic State Central Committee of California-SCC (ID# 741666). For purposes of settlement, these violations will not be charged.

On its campaign statements, during the 90-day period preceding the November 8, 2016, general election, the Committee reported receiving from Mary Davey Schambach five contributions as follows:

DATE RECEIVED	AMOUNT
08/23/2016	\$250
09/20/2016	\$250
10/09/2016	\$250
10/22/2016	\$100
10/27/2016	\$250
TOTAL:	\$1,100

The Committee was required to file a 24-hour contribution report by October 28, 2016 for the late contributions received from Mary Davey Schambach that totaled, in the aggregate, \$1,100. The Committee did not file a 24-hour contribution report for these late contributions.

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Also, on its campaign statements, during the 90-day period preceding the November 8, 2016, general election, the Committee reported receiving from Desert Stonewall Democrats (ID# 1220539) five contributions as follows:

DATE RECEIVED	AMOUNT
09/23/2016	\$158 (Non-Monetary)
09/25/2016	\$150
10/16/2016	\$500
10/16/2016	\$65 (Non-Monetary)
11/02/2016	\$500
TOTAL:	\$1,373

The Committee was required to file a 24-hour contribution report by November 3, 2016 for the late contributions received from Desert Stonewall Democrats that totaled, in the aggregate, \$1,373. The Committee did not file a 24-hour contribution report for these late contributions. However, Desert Stonewall Democrats timely filed a 24-hour contribution report on November 1, 2016, reporting the \$500 contribution to the Committee received on November 2, 2016.

On October 22, 2016, the Committee reported receiving a \$1,000 contribution from Art Copleston on its pre-election campaign statement. The Committee did not file a 24-hour contribution report for this late contribution.

In summary, Rodriguez and the Committee failed to file three 24-hour contribution reports. Although, approximately 78% of the late contributions were reported prior to the election on other campaign statements filed by the Committee as follows:

DATE	CONTRIBUTOR	AMOUNT	REPORTED PRIOR
RECEIVED	CONTRIBUTOR	AMOUNT	TO ELECTION?
08/23/2016	Mary Davey Schambach	\$250	YES
09/20/2016	Mary Davey Schambach	\$250	YES
10/09/2016	Mary Davey Schambach	\$250	YES
10/22/2016	Mary Davey Schambach	\$100	YES
10/27/2016	Mary Davey Schambach	\$250	NO
09/23/2016	Desert Stonewall Democrats	\$158 (Non-Monetary)	YES
09/25/2016	Desert Stonewall Democrats	\$150	YES
10/16/2016	Desert Stonewall Democrats	\$500	YES
10/16/2016	Desert Stonewall Democrats	\$65 (Non-Monetary)	YES
11/02/2016	Desert Stonewall Democrats	\$500	NO
10/22/2016	Art Copleston	\$1,000	YES
	TOTAL:	\$3,473	

#### Failure to Report Required Contributor Information

On each campaign statement, the Committee reported the full name of the contributors who gave \$100 or more, each contributor's city, state and zip code, as well as the occupation and employer information for applicable contributors. Also, the Committee reported the date and amount received from each contributor for each contribution made and the cumulative amount for the calendar year.

On the campaign statement, for the reporting period of March 1, 2015 through June 30, 2015, the Committee reported receiving a total of \$49,420 in itemized contributions. The Committee failed to report the street name and building number for approximately 147 contributions received totaling \$38,874. This amounts to approximately 79% of the total itemized contributions received for this reporting period (\$38,874 / 49,420 = 0.786).

On the campaign statement, for the reporting period of July 1, 2015 through December 31, 2015, the Committee reported receiving a total of \$28,578 in itemized contributions. The Committee failed to report the street name and building number for approximately 166 contributions received totaling \$22,876. This amounts to approximately 80% of the total itemized contributions received for this reporting period (\$22,876 / 28,578 = 0.800).

On the campaign statement, for the reporting period of January 1, 2016 through April 23, 2016, the Committee reported receiving a total of \$27,811 in itemized contributions. The Committee failed to report the street name and building number for approximately 124 contributions received totaling \$16,260. This amounts to approximately 58% of the total itemized contributions received for this reporting period (\$16,260 / 27,811 = 0.584).

On the campaign statement, for the reporting period of April 24, 2016 through May 21, 2016, the Committee reported receiving a total of \$14,725 in itemized contributions. The Committee failed to report the street name and building number for approximately 41 contributions received totaling \$6,255. This amounts to approximately 42% of the total itemized contributions received for this reporting period (\$6,255 / 14,725 = 0.424).

On the campaign statement, for the reporting period of May 22, 2016 through June 30, 2016, the Committee reported receiving a total of \$15,102 in itemized contributions. The Committee failed to report the street name and building number for approximately 76 contributions received totaling

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\$10,692. This amounts to approximately 71% of the total itemized contributions received for this reporting period (\$10,692 / 15,102 = 0.707).

On the campaign statement, for the reporting period of July 1, 2016 through September 24, 2016, the Committee reported receiving a total of \$37,648 in itemized contributions. The Committee failed to report the street name and building number for approximately 160 contributions received totaling \$25,219. This amounts to approximately 67% of the total itemized contributions received for this reporting period (\$25,219 / 37,648 = 0.669).

On the campaign statement, for the reporting period of September 25, 2016 through October 22, 2016, the Committee reported receiving a total of \$28,545 in itemized contributions. The Committee failed to report the street name and building number for approximately 96 contributions received totaling \$12,530. This amounts to approximately 44% of the total itemized contributions received for this reporting period (\$12,530 / 28,545 = 0.438).

On the campaign statement, for the reporting period of October 23, 2016 through December 8, 2016, the Committee reported receiving a total of \$10,196 in itemized contributions. The Committee failed to report the street name and building number for approximately 37 contributions received totaling \$4,445. This amounts to approximately 44% of the total itemized contributions received for this reporting period (\$4,445 / 10,196 = 0.435).

Overall, Rodriguez and the Committee reported receiving a total of \$212,025 in itemized contributions between January 1, 2015 through December 8, 2016. Rodriguez and the Committee failed to report the street name and building number for approximately 847 contributions received totaling \$137,151. This amounts to approximately 65% of the total itemized contributions received by the Committee (\$137,151 / \$212,025 = 0.647).

#### VIOLATIONS

#### Count 1: Failure to Maintain Detailed Campaign Records

Rodriguez and the Committee failed to maintain detailed campaign records for contributions received and expenditures made between January 1, 2015 through December 8, 2016 totaling \$212,025 and \$206,169 respectively, in violation of Government Code Section 84104.

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#### **Count 2: Failure to File Three 24-Hour Contribution Reports**

Prior to the November 8, 2016, general election, Rodriguez and the Committee failed to file three 24-hour contribution reports for contributions received totaling \$3,473, in violation of Government Code Section 84203.

#### Count 3: Failure to Report Required Contributor Information

Rodriguez and the Committee failed to report required contributor information for approximately 847 contributions received between January 1, 2015 through December 8, 2016 totaling \$137,151, in violation of Government Code Section 84211.

#### PROPOSED PENALTY

This matter consists of three counts. The maximum penalty that may be imposed is \$5,000 per count. Thus, the maximum penalty that may be imposed here is \$15,000.<sup>16</sup>

In determining the appropriate penalty for a particular violation of the Act, the Commission considers the facts of the case, the public harm involved, and the purposes of the Act. Further, the Commission considers factors such as: (a) the seriousness of the violation; (b) the presence or absence of any intention to conceal, deceive or mislead; (c) whether the violation was deliberate, negligent or inadvertent; (d) whether the violation was isolated or part of a pattern; (e) whether corrective amendments voluntarily were filed to provide full disclosure; and (f) whether the violator has a prior record of violations.<sup>17</sup>

One of the essential purposes of the recordkeeping provision is to establish that campaign statements were properly filed, and contributions and expenditures were properly reported. This violation is considered more serious when the failure to maintain campaign records inhibits audit efforts. The seriousness of the recordkeeping violation committed here is increased due to the lack of campaign records for 100% of the contributions received of \$100 or more and for approximately 99.64% of the expenditures made of \$100 or more.

The public harm inherent in campaign reporting violations is that the public is deprived of important, time-sensitive information regarding campaign activity. Generally, these types of violations

<sup>&</sup>lt;sup>16</sup> Section 83116, subdivision (c).

<sup>&</sup>lt;sup>17</sup> Regulation 18361. 5, subdivision (d).

are considered more serious when the public is deprived of information that was required to be disclosed prior to an election because this has the potential to affect how votes are cast. Another factor that influences the seriousness of the violation is whether the public harm was mitigated because some of the reportable activity was disclosed, prior to the election. The seriousness of failing to file 24-hour contribution reports here is mitigated because approximately 78% of these late contributions were reported on the Committee's timely filed pre-election campaign statements.

In this case, there was no evidence to support an intent to conceal, deceive or mislead the public as to the Committee's receipts and expenditures. However, the recordkeeping violation appears to be deliberate because Rodriguez admits he shredded the documents after he lost the election. Also, Rodriguez is sophisticated with the Act as he admits to have spent over 30 years working on political campaigns. The violations committed here were isolated as Rodriguez and the Committee have not had prior enforcement history.

The Commission considers penalties in prior cases with the same or similar violations and comparable facts.

#### Count 1: Failure to Maintain Detailed Campaign Records

In the Matter of Fred Garcia, Fred Garcia for Sheriff 2014, and Jeff Davis; FPPC Case No. 14/299. Respondents, an unsuccessful candidate for Monterey County Sheriff and his controlled committee, failed to maintain detailed campaign records of contributions and loans received and expenditures made. The total size of the Committee was approximately \$51,167 in contributions received and \$48,408 in expenditures made. Garcia had previously been issued a warning letter from the FPPC for failure to maintain campaign records during his 2010 campaign (FPPC Case No. 12/426). On July 21, 2016, the Commission approved a penalty of \$2,000 for this count.

A similar penalty than that approved in the *Garcia* case is recommended. Like *Garcia*, Rodriguez and the Committee failed to maintain detailed campaign records of contributions received and expenditures made. Although, Rodriguez and the Committee raised and spent over four times the amounts raised and spent in *Garcia*. In mitigation, Rodriguez claims all records were maintained until he was defeated in the November 8, 2016, general election. Further, Rodriguez and the Committee do

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not have prior enforcement history and Garcia had been previously warned of the requirement to maintain all campaign records. Therefore, a penalty of \$2,000 is recommended.

#### **Count 2: Failure to File Three 24-Hour Contribution Reports**

In the Matter of Hector Chacon and Re-Elect Chacon for School Board 2013; FPPC Case No. 17/227. Respondents, a successful candidate for the Board of Directors for Montebello Unified School District and his controlled committee, failed to file two 24-hour contribution reports totaling \$2,718. Additionally, Respondents failed to report the contributions, prior to the election, on its pre-election campaign statement. The size of the committee in 2013 was approximately \$64,805 received in contributions and \$65,406 made in expenditures. On February 21, 2019, the Commission approved a penalty of \$2,500 for this count.

A lesser penalty than that approved in the *Chacon* case is recommended. Like *Chacon*, Rodriguez and the Committee failed to file three 24-hour contribution reports for late contributions received totaling \$3,473. Unlike *Chacon*, the size of the Committee here was much larger, receiving and spending approximately three times more than the committee in *Chacon*. In mitigation, approximately 78% of the late contributions received were reported on timely filed pre-election campaign statements. Also, in mitigation, two of the three required 24-hour contribution reports were from aggregated contributions that are more challenging to calculate. Therefore, a penalty of \$2,000 is recommended.

#### Count 3: Failure to Report Required Contributor Information

*In the Matter of Tom Wheeler for Supervisor District 5 – 2018, Tom Wheeler, and Nancy D.* Beavers; FPPC Case No. 18/381. Respondents, a candidate for County Supervisor in District 5 of Madera County, his controlled committee and treasurer, failed to report employer and occupation information of contributors. In the first half of 2018, the committee reported raising \$42,811 in contributions and spending \$75,405 in expenditures. Wheeler was sophisticated with the Act as Wheeler campaigned for his first election in 2006 and again in 2010, 2014, and 2018. Wheeler, the committee and Beavers failed to report the employer and occupation of 24 individual contributors totaling \$10,927, or 25% of the total contributions received. On September 20, 2018, the Commission approved a penalty of \$1,500 for this count.

A higher penalty than that approved in the *Wheeler* case is recommended. Like *Wheeler*, the Committee and Rodriguez failed to report certain contributor information on its campaign statements. Unlike *Wheeler*, the Committee and Rodriguez failed to report the street name and building number for approximately 847 contributions received for a total of \$137,151. This amounts to approximately 65% of the total contributions received by the Committee of \$100 or more. Further, the Committee received multiple contributions from an anonymous source totaling approximately \$600. Therefore, a penalty of \$2,000 is recommended.

Under these circumstances, it is respectfully submitted that imposition of an agreed upon penalty in the amount of \$6,000 is justified, as reflected in the chart below:

Count	Violation	Penalty
1	Failure to Maintain Detailed Campaign Records	\$2,000
2	Failure to File Three 24-Hour Contribution Reports	\$2,000
3	3 Failure to Report Required Contributor Information	
	TOTAL:	\$6,000

#### **CONCLUSION**

Complainant, the Enforcement Division of the Fair Political Practices Commission, and Respondents, Greg Rodriguez for 42nd State Assembly, 2016 and Greg Rodriguez hereby agree as follows:

- 1. Respondents violated the Act as described in the foregoing pages, which are a true and accurate summary of the facts in this matter.
- 2. This stipulation will be submitted for consideration by the Fair Political Practices Commission at its next regularly scheduled meeting or as soon thereafter as the matter may be heard.
- 3. This stipulation resolves all factual and legal issues raised in this matter for the purpose of reaching a final disposition without the necessity of holding an administrative hearing to determine the liability of Respondents pursuant to Section 83116.
- 4. Respondents understand, and hereby knowingly and voluntarily waive, any and all procedural rights set forth in Sections 83115.5, 11503, 11523, and Regulations 18361.1 through 18361.9. This includes, but is not limited to the right to appear personally at any administrative

1	hearing held in this matter, to be represented by an attorney at Respondents' own expense, to	
2	confront and cross-examine all witnesses testifying at the hearing, to subpoena witnesses to	
3	testify at the hearing, to have an impartial administrative law judge preside over the hearing as a	
4	hearing officer, and to have the matter judicially reviewed.	
5	5. Respondents agree to the issuance of the decision and orders set forth below. Also,	
6	Respondents agree to the Commission imposing against them an administrative penalty in the	
7	amount of \$6,000. One or more cashier's checks or money orders totaling said amount – to be	
8	paid to the General Fund of the State of California – is/are submitted with this stipulation as full	
9	payment of the administrative penalty described above, and same shall be held by the State of	
10	California until the Commission issues its decision and order regarding this matter.	
11	6. If the Commission refuses to approve this stipulation – then this stipulation shall become	
12	null and void, and within fifteen business days after the Commission meeting at which the	
13	stipulation is rejected, all payments tendered by Respondents in connection with this stipulation	
14	shall be reimbursed to Respondents. If this stipulation is not approved by the Commission, and if	
15	a full evidentiary hearing before the Commission becomes necessary, neither any member of the	
16	Commission, nor the Executive Director, shall be disqualified because of prior consideration of	
17	this stipulation.	
18	7. The parties to this agreement may execute their respective signature pages separately. A	
19	copy of any party's executed signature page, including a hardcopy of a signature page	
20	transmitted via fax or as a PDF email attachment, is as effective and binding as the original.	
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22	Dated:	
23	Galena West, Chief of Enforcement Fair Political Practices Commission	
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25	Dated:	
26	Greg Rodriguez, individually and on behalf of Greg Rodriguez for 42nd State Assembly, 2016,	
27	Respondents	
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1	The foregoing stipulation of the parties "In the Matter of Greg Rodriguez for 42nd State
2	Assembly, 2016 and Greg Rodriguez," FPPC Case No. 18/179, is hereby accepted as the final decision
3	and order of the Fair Political Practices Commission, effective upon execution by the Chair.
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5	IT IS SO ORDERED.
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7	Dated:
8	Richard C. Miadich, Chair Fair Political Practices Commission
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