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8
9 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION
10 STATE OF CALIFORNIA
11

12 In the Matter of:

FPPC Case No. 15/1635

13 SAN FRANCISCO BAY AREA
14 RENTERS POLITICAL ACTION
15 COMMITTEE, AND SONJA TRAUSS,

STIPULATION, DECISION AND ORDER

16 Respondents.
17

18 **INTRODUCTION**

19 San Francisco Bay Area Renters Political Action Committee (the “Committee”) was a state
20 general purpose committee, and Sonja Trauss (“Trauss”) was the Committee’s treasurer and principal
21 officer. The Committee qualified on June 19, 2015, terminated on August 16, 2016, and was active during
22 the November 3, 2015 Special Election in San Francisco. During that time, the Committee raised
23 approximately \$33,186.50 and spent approximately \$26,032.53.

24 Respondents violated the Political Reform Act¹ (the “Act”) by failing to maintain adequate records
25 for expenditures made and contributions received, failing to file full and accurate campaign statements,
26 and impermissibly commingling campaign funds with personal funds of Trauss.
27

28 ¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practice Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

1 **SUMMARY OF THE LAW**

2 The Act and its regulations are amended from time to time. For this reason, all legal references and
3 discussions of law pertain to the Act’s provisions as they existed at that time.

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

5 When enacting the Act, the people of California found and declared that previous laws regulating
6 political practices suffered from inadequate enforcement by state and local authorities.² For this reason,
7 the Act is to be construed liberally to accomplish its purposes.³

8 One purpose of the Act is to promote transparency by ensuring that receipts and expenditures in
9 election campaigns are fully and truthfully disclosed so that voters are fully informed and improper
10 practices are inhibited.⁴ Along these lines, the Act includes a comprehensive campaign reporting system.⁵
11 Another purpose of the Act is to provide adequate enforcement mechanisms so that the Act will be
12 “vigorously enforced.”⁶

13 Recipient Committee

14 In 2015, any person who received contributions totaling \$1,000 or more qualified as a recipient
15 committee.⁷ A contribution includes any payment, except to the extent full and adequate consideration is
16 received, unless it is clear from the surrounding circumstances that it is not made for a political purpose.⁸
17 Contributions include any transfer of anything of value received by a committee.⁹ A “contribution”
18 includes any goods or services received by a candidate or committee at no charge or at a discount from fair
19 market value.¹⁰ This type of contribution is commonly referred to as a “nonmonetary” or “in kind”
20 contribution.

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23 _____
24 ² Section 81001, subd. (h).

25 ³ Section 81003.

26 ⁴ Section 81002, subd. (a).

27 ⁵ Section 84200, *et seq.*

28 ⁶ Section 81002, subd. (f).

⁷ Section 82013, subd. (a).

⁸ Section 82015, subd. (a).

⁹ Section 82015, subd. (d).

¹⁰ Regulation 18215, subd. (b)(3).

1 Recordkeeping

2 It is the duty of each candidate, treasurer, principal officer, and elected officer to maintain detailed
3 accounts, records, bills, and receipts necessary to prepare campaign statements, to establish that campaign
4 statements were properly filed.¹¹ The original source documentation must consist of cancelled checks,
5 wire transfers, credit card charge slips, bills, receipts, invoices, statements, vouchers, and any other
6 documents reflecting obligations incurred by the candidate, elected officer, campaign treasurer, or
7 committee, and disbursements made from any checking or savings account, or any other campaign
8 accounts, in any bank or other financial institution.¹²

9 Commingling

10 No contribution shall be commingled with the personal funds of the recipient or any other person.¹³

11 Mandatory Filing of Campaign Statements

12 At the core of the Act's campaign reporting system is the requirement that committees file
13 campaign statements and reports for certain reporting periods and by certain deadlines.¹⁴

14 The Act requires committees to file semiannual campaign statements twice per year disclosing
15 their campaign contributions and expenditures. A recipient committee must file a semiannual statement
16 by January 31 for the period ending December 31 and by July 31 for the period ending June 30, or the
17 next business day if the deadline falls on a weekend or holiday.¹⁵

18 Contents of Campaign Statements

19 The Act requires that committees report the total amount of contributions received during the period
20 covered by the campaign statement from persons who have given a cumulative amount of \$100 or more;
21 and persons who have given a cumulative amount of less than \$100.¹⁶ Further, the Act requires that
22 committees report the name, address, occupation, and employer of each person that contributes \$100 or
23 more on its campaign statements.¹⁷

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25 ¹¹ Section 84104.

26 ¹² Regulation 18401.

27 ¹³ Section 84307.

28 ¹⁴ Sections 84200, *et seq.*

¹⁵ Section 84200, subd. (a); Regulation 18116, subd. (a).

¹⁶ Section 84211, subds. (a), (c), and (d).

¹⁷ Section 84211, subd. (f).

1 The Act also requires that committees report the total amount of expenditures made during the
2 period covered by the campaign statement to persons who have received \$100 or more; and persons who
3 have received less than \$100.¹⁸ For each person to whom an expenditure of \$100 or more has been made,
4 the committee must report the name and address of the recipient, the amount of the expenditure, and a
5 brief description of the consideration for which each expenditure was made.¹⁹ If the expenditure is an
6 independent expenditure, the committee must also report the date of the independent expenditure; the
7 cumulative amount of independent expenditures made relative to a candidate or measure; the full name of
8 the pertinent candidate, and the office and district for which he or she seeks nomination or election, or the
9 number or letter of the measure; and the jurisdiction in which the measure or candidate is voted upon.²⁰

10 Joint and Several Liability of Committee, Principal Officer, and Treasurer

11 Every committee must have a treasurer.²¹ It is the duty of a committee treasurer to ensure that the
12 committee complies with the campaign reporting provisions of the Act.²² It is the duty of the committee's
13 principal officer to authorize the content of communications made by the committee, authorize
14 expenditures made by the committee, and determine the committee's campaign strategy.²³ A treasurer and
15 principal officer may be held jointly and severally liable, along with the committee, for violations
16 committed by the committee.²⁴

17 **SUMMARY OF THE FACTS**

18 Trauss was the treasurer for the self-identified state general purpose committee, San Francisco Bay
19 Area Renters Political Action Committee. The Committee qualified on June 19, 2015 and terminated on
20 August 16, 2016 and was active during the November 3, 2015 Special Election in San Francisco. During
21 that time, the Committee raised approximately \$33,186.50 and spent approximately \$26,032.53. Trauss, a
22 Bay Area resident, opened the Committee as a means to make change in her community, particularly with
23 regards to housing and land-use issues. Trauss believed the Committee could achieve those goals through
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25 ¹⁸ Section 84211, subd. (b), (i), and (j).

26 ¹⁹ Section 84211, subd. (k).

27 ²⁰ Section 84211, subd. (k)(5).

28 ²¹ Section 84100.

²² Sections 81004, 84100, 84104, and 84213; Regulation 18427.

²³ Section 82047.6; Regulation 18402.1, subd. (b).

²⁴ Sections 83116.5 and 91006.

backing politicians that supported the Committee’s causes, and possibly bring lawsuits and propose legislation to promote and propel these housing and land-use issues. When the Committee was established, Trauss quit her job in order to be an activist full time. The Committee and Trauss did not maintain adequate records for expenditures made and contributions received and failed to file full and accurate campaign statements. Campaign funds were commingled with personal funds of Trauss.

Recordkeeping

It is the duty of each treasurer and principal officer to maintain detailed accounts, records, bills, and receipts necessary to prepare campaign statements, to establish that campaign statements were properly filed, and to otherwise comply with the Act.

The Committee failed to keep adequate records for the following reported expenditures:

Table 1: Expenditures Reported on Campaign Statements

#	Payee	Amount	Paid from	Purpose ²⁵
1	Nationbuilder	\$172	Trauss’ personal American Express Card	Website payments.
2	Jennifer Rabon	\$300	Trauss’ personal PayPal	Graphic design for election mailer.
3	Marcus Ismail	\$2,500	\$1,000 from Trauss’ personal bank account; \$1,500 from the Committee bank account	Graphic design work and organizing people for projects.
4	Wood Robbins	\$1,422	Committee bank account	Legal work.
5	Tim McCormick	\$2,500	Trauss’ personal bank account	Administrative work, writing and research.
6	Yes Locksmith	\$195	Committee bank account	New locks.
7	Sonja Trauss	\$14,158.97 ²⁶	\$4,500 from the Committee bank account; the rest was funds received by Tilt, Paypal, and an art show fundraiser, and deposited into Trauss’ personal bank account.	Consulting/Salary/Wages for Trauss.
	TOTAL	\$21,247.97		

The Committee failed to produce proper source documentation for a total of \$21,247.97 in expenditures made during the reporting periods of January 1, 2015-June 30, 2015, July 1, 2015- December 31, 2015, January 1, 2016-June 30, 2016, and July 1, 2016- August 16, 2016. Of this amount, \$14,158.97

²⁵ The “purpose” was identified on the campaign statements.

²⁶ This amount is from four separate expenditures: \$400, \$12,083.90, \$1,000 and \$675.07.

1 were payments to Trauss herself. Trauss stated she paid herself for performing the following on behalf of
2 the Committee: research, education, publication, organizing social events, speaking, networking, and
3 organizing people to speak at public hearings, and she claims that all payments were directly related to a
4 political, legislative, or governmental purpose of the Committee as permitted.²⁷ However, the Committee
5 and Trauss failed to keep any documentation that Trauss was paid for performing services directly related
6 to a political, legislative, or governmental purposes.

7 As discussed below, Trauss commingled Committee funds with her personal funds. This, plus a
8 lack of recordkeeping led to \$1,787.21 in campaign funds received by Trauss that were unaccounted for
9 and not reported on any campaign statement.

10 Commingling

11 The Committee and Trauss impermissibly commingled Committee funds with Trauss' personal
12 funds. Trauss received \$17,252 in campaign funds that were not deposited into the campaign bank account
13 and were commingled with her personal funds. Trauss received initial campaign contributions through the
14 crowd funding website Tilt. During the period of June 19, 2015 until July 22, 2015, \$14,244 in
15 contributions were raised through Tilt. On July 13, 2015 and July 31, 2015 Trauss deposited \$6,255 and
16 \$7,989 (\$14,244 total) of the Tilt contributions into her personal bank account. And Trauss received \$2,250
17 in campaign contributions in her personal PayPal account. Trauss also deposited \$758 contributions raised
18 from an art show into her personal bank account.

19 Trauss also paid Committee expenditures out of her personal accounts. Although that is not a
20 violation under Section 84307, the commingling of contributions into Trauss' personal accounts, then
21 paying expenditures from those accounts, plus a lack of recordkeeping made it difficult to determine if the
22 payments were for performing services directly related to a political, legislative, or governmental purpose
23 for the Committee.

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27 ²⁷ Campaign funds shall not be used to compensate any individual or individuals with authority to approve the expenditure of
28 campaign funds for the performance of political, legislative, or governmental activities, except to pay for or reimburse the cost
of professional services and for reimbursement of out-of-pocket expenses incurred for political, legislative, or governmental
purposes. Expenditures by a committee to pay for professional services reasonably required by the committee to assist it in the
performance of its administrative functions are directly related to a political, legislative, or governmental purpose. Sections
89518, subd. (b), and 89513 subd. (b).

1 Campaign Statements

2 **Semi-Annual for January 1, 2015 – June 30, 2015**

3 The Committee timely filed a campaign statement for the reporting period of January 1, 2015-June
4 30, 2015 on July 31, 2015. The complaint alleged that the original statement was missing Swati
5 Mylavarapu’s street address and occupation, who contributed \$500. While the street address was
6 missing, “none” was written for his occupation. On October 20, 2015, the Committee filed an
7 amended campaign statement with the San Francisco Ethics Commission that reported the street
8 address of Mylavarapu and listed the occupation as unemployed. An amended campaign statement was
9 not filed with the Secretary of State's office to report this information.

10 The Committee then filed another amended statement for this period on May 17, 2017, improperly
11 removing all contributions received through the crowd funding website Tilt. Trauss stated she filed this
12 amendment based on advice from her attorney at the time. When Trauss opened the Tilt crowd fundraising
13 account, she did not yet have a committee, and she opened the account under the name, “San Francisco
14 Bay Area Renters Federation.” The Tilt campaign was created to support San Francisco Bay Area Renters
15 Federation’s media outreach and political advocacy regarding local land-use and legislative change. In the
16 narrative to the solicitation she stated: “Once \$1,000 is raised, the Sfba Renters Political Action Committee
17 will become a qualified committee.” She further informed donors that the amount they gave would
18 determine how much of their information she would need to disclose on campaign filings. Contributions
19 received through Tilt were called member dues, and those who contributed could participate in choosing
20 who the Committee would support in the November 2015 and June 2016 elections.

21 The Committee violated the Act when it filed an amended statement that did not report \$5,376 in
22 contributions – \$4,200 in contributions of \$100 or more from 13 contributors, and \$1,176 in contributions
23 of under \$100.

24 **Semi-Annual for July 1, 2015 – December 31, 2015**

25 The Committee untimely filed a campaign statement for the reporting period of July 1, 2015-
26 December 31, 2015 on February 4, 2016, three days late. This statement failed to report a \$250 expenditure
27 to Ethan Ashley for campaign consulting, and a \$186.99 expenditure to Trauss for office expenses. The
28 Committee then filed an amended statement for this period on May 17, 2017, improperly removing all

1 contributions received through the crowd funding website Tilt. Again, Trauss stated she filed this
 2 amendment based on advice from her former attorney. A \$6,000 nonmonetary contribution for office space
 3 reported on the original campaign statement was also improperly removed on the amended campaign
 4 statement. The Committee violated the Act when it filed an amended statement that did not report \$8,533
 5 in contributions of \$100 or more from 9 contributors, and \$394 in contributions of under \$100, and a \$6,000
 6 nonmonetary contribution. The Committee further violated the Act when it inaccurately removed or
 7 reported the incorrect amount for the below listed (lines 1-9) expenditures for 9 payees on its amended
 8 semi-annual statement.

9 **Table 2: Expenditure Reporting for the July 1, 2015- December 31, 2015 Period**

	Payee	Reason for Payment	Original	Amended
10	1 Tim McCormick	Research, web and administration help.	\$2,500	N/A
11	2 Office Depot	Printer.	\$329.99	N/A
12	3 Wood Robinson	Legal Research.	\$1,422	\$2,500
13	4 Marcus Ismael	Organized people for projects at SOMA, and did website work.	\$2,500	\$1,500
14	5 Jon Schwark	Facebook Ads.	\$539.60	N/A
15	6 Muji Soma	Office Supplies.	\$142.12	N/A
16	7 Jennifer Rabon	Designing a mailer.	\$300	N/A
17	8 Nationbuilder	Website.	\$172	N/A
18	9 Sonja Trauss	Staff time for all other activities.	\$12,083.90	\$6,221.34
	10 Ethan Ashley	Consulting	N/A	\$250
	11 Sonja Trauss	Office Supplies	N/A	\$186.99

19 **VIOLATIONS**

20 **Respondents San Francisco Bay Area Renters Political Action Committee and Sonja Trauss**

21 **Count 1: Failure to Maintain Campaign Records**

22 The Committee and Trauss failed to maintain adequate records for \$21,247.97 of reported
 23 expenditures and \$1,787.21 of unreported expenditures, in violation of Section 84104 and Regulation
 24 18401.

25 **Count 2: Impermissible Commingling of Contributions with Personal Funds**

26 The Committee and Trauss commingled \$17,252 of contributions received by the Committee with
 27 the personal funds of Trauss, in violation of Section 84307.

1 Count 3: Failure to Fully Disclose Campaign Activity on Semi-Annual Campaign Statements

2 The Committee and Trauss failed to disclose \$4,200 in contributions of \$100 or more from 13
3 contributors, and \$1,176 in contributions of under \$100 for the reporting period of January 1, 2015 through
4 June 30, 2015 and failed to disclose \$8,533 in contributions of \$100 or more from 9 contributors, and \$394
5 in contributions of under \$100, and a \$6,000 nonmonetary contribution, and failed to disclose the correct
6 amount for expenditures to 9 payees for the reporting period of July 1, 2015 through December 31, 2015,
7 in violation of Section 84211, subdivisions (a), (b), (c), (d), (f), and (k).

8 **PROPOSED PENALTY**

9 This matter consists of three counts. The maximum penalty that may be imposed is \$5,000 per
10 count. Thus, the maximum penalty that may be imposed is \$15,000.²⁸

11 In determining the appropriate penalty for a particular violation of the Act, the Commission
12 considers the facts of the case, the public harm involved, and the purposes of the Act. Also, the Commission
13 considers factors such as: (a) the seriousness of the violation; (b) the presence or absence of any intention
14 to conceal, deceive or mislead; (c) whether the violation was deliberate, negligent or inadvertent; (d)
15 whether the violation was isolated or part of a pattern; (e) whether corrective amendments voluntarily were
16 filed to provide full disclosure; and (f) whether the violator has a prior record of violations.²⁹

17 In this case, the Enforcement Division found no evidence that Respondents intended to conceal,
18 deceive, or mislead the public. This was Trauss' first committee, and Respondents do not have a prior
19 history of violations. However, the public harm in this matter is high. The lack of recordkeeping,
20 commingling of funds, and filing inaccurate statements disrupted the transparency the Act strives to
21 promote. The lack of transparency here violated the trust of the contributors giving to the Committee.

22 The Commission also considers penalties in prior cases involving similar violations. Recent similar
23 cases involving respondents' failure to maintain campaign records include the following:

- 24 • *In the Matter of Jose Esteves, Esteves for Mayor 2012, and Arsenio Illoreta*; FPPC No. 15/147.
25 Respondents failed to keep records for 24 payments made by the Committee to Esteves and his
26 wife between September 2012 and December 2014, totaling approx. \$19,750. According to
27

28 ²⁸ Section 83116, subd. (c).

²⁹ Regulation 18361.5, subd. (d).

1 Esteves, the payments were reimbursements for campaign expenses. The payments by the
2 Committee to Esteves were reported on the Committee's campaign statements so there was no
3 evidence of intent to conceal. Also, there was no evidence proving personal use resulted from these
4 expenditures. In March 2017, the Commission approved a fine of \$2,500 on one count.

5 As to Count 1, Respondents are deserving of a penalty higher than *Esteves*. Like in *Esteves*, the
6 Committee paid Trauss and others for alleged services provided to the Committee, but the lack of records
7 left the Enforcement Division unable to confirm the purpose of those payments. Also like in *Esteves*, the
8 payments by the Committee to Esteves were reported on the Committee's campaign statements so there
9 was no evidence of intent to conceal. This violation here is more harmful than *Esteves*, because here the
10 lack of recordkeeping left the Enforcement Division unable to reconcile the \$1,787.21 of funds received
11 by Trauss that went unreported. Further, the commingling of contributions and expenditures with the
12 personal funds of Trauss further prevented Enforcement from determining whether Trauss used campaign
13 funds for personal purposes which were unrelated to a political, legislative, or governmental purpose.

14 Recent similar cases involving respondents' impermissible commingling of contributions include
15 the following:

- 16 • *In the Matter of Joe Canciamilla for Contra Costa County Clerk/Recorder 2014/2018, Friends of*
17 *Joe Canciamilla for Judge 2012/2014, and Joseph Canciamilla*; FPPC No. 17/146. Respondent,
18 Joseph Canciamilla is the former Contra Costa County Clerk-Recorder and Registrar of Voters, as
19 well as a former candidate for Contra Costa County Superior Court Judge. Joe Canciamilla for
20 Contra Costa County Clerk/Recorder 2014/2018 and Joe Canciamilla for Judge 2012/2014 were
21 his candidate-controlled committees. In 2011, 2014, and 2015, Canciamilla used campaign funds
22 for personal purposes which were unrelated to a political, legislative, or governmental purpose, in
23 violation of Sections 89510, subdivision (b), 89512, and 89513, subdivision (a) (15 counts). From
24 2011 through 2019, this activity was concealed on campaign statements by other violations
25 including non-reporting, commingling, and the over-statement of available cash on hand, in
26 violation of Sections 84211 and 84307 (15 counts). In November 2019 the Commission approved
27 fines of: \$150,000 - \$75,000 to Canciamilla personally, and \$75,000 for Canciamilla and his
28 committees, with the commingling count carrying a penalty of \$5,000.

1 For Count 2, Respondents are deserving of a penalty lower than the penalty in *Canciamilla*. The
2 amount of contributions commingled by the Committee and Trauss is much lower than the amount at issue
3 in *Canciamilla*. Further, there was evidence of the aggregating factor of concealment in the *Canciamilla*
4 case, but not in this matter. While commingling is a serious violation because it obscures the public's
5 ability to learn the true source of a committee's support, a penalty lower than *Canciamilla* is recommended
6 due to the lower amount commingled, and the lack of intent to conceal.

7 Recent similar cases involving respondents' failure to fully disclose campaign activity on semi-
8 annual campaign statements include the following:

- 9 • *In the Matter of Privacy for All Students, Karen England, and John Fugatt*; FPPC No. 14/1111.
10 The Committee failed to timely report \$23,438 in contributions on a quarterly campaign statement;
11 \$18,919 in contributions, \$55,088.50 in expenditures, and a \$55,088.50 miscellaneous increase to
12 cash on a semiannual campaign statement; and \$900 in contributions on a semiannual campaign
13 statement. In August 2018, the Commission approved a fine of \$3,000 on this count.

14 As to Count 3, Respondents are deserving of a penalty similar to *Privacy for All Students*. The
15 comparable case deals with original statements that failed to fully disclose the Committee's activity. Here,
16 the Committee filed amended statements that removed campaign contributions, and removed expenditures
17 or incorrectly changed the amount of the expenditure. And even though here the amount unreported and
18 the quantity of statements is lower than in *Privacy*, a penalty of \$3,000 is justified based on the aggravating
19 factor of the late-filed statement that is not being charged, and the two expenditures left off the original
20 statement for the reporting period of July 1, 2015 through December 31, 2015 that are not charged.

21 The Committee and Trauss' commingling of Committee contributions into Trauss' personal
22 accounts, then paying expenditures out of those personal accounts but failing to keep adequate records for
23 those expenditures, including payments to herself, and then filing inaccurate amended campaign statements
24 thwarted the transparency in campaign finance that the Act desires. Each violation charged aggravates the
25 others.

26 After considering the factors listed in Regulation 18361.5, prior similar cases, and other
27 relevant factors, a total penalty amount of \$9,500 is recommended.

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Count	Violation	Proposed Penalty
1	Failure to Maintain Campaign Records	\$3,000
2	Impermissible Commingling of Contributions with Personal Funds	\$3,500
3	Failure to Fully Disclose Campaign Activity on Semi-Annual Campaign Statements	\$3,000
TOTAL:		\$9,500

CONCLUSION

Complainant, the Enforcement Division of the Fair Political Practices Commission, and Respondents, San Francisco Bay Area Renters Political Action Committee and Sonja Trauss, 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 hearing held in this matter, to be represented by an attorney at Respondents’ own expense, to confront and cross-examine all witnesses testifying at the hearing, to subpoena witnesses to testify at the hearing, to have an impartial administrative law judge preside over the hearing as a hearing officer, and to have the matter judicially reviewed.

5. Respondents agree to the issuance of the decision and order set forth below. Also, Respondents agree to the Commission imposing against them an administrative penalty in the amount of \$9,500. One or more payments totaling this amount, to be paid to the General Fund of the State of California, is/are submitted with this stipulation as full payment of the administrative penalty described above, and they will be held by the State of California until the Commission issues its decision and order

1 regarding this matter.

2 6. If the Commission declines to approve this stipulation—then this stipulation shall become
3 null and void, and within fifteen business days after the Commission meeting at which the stipulation is
4 rejected, all payments tendered by Respondents in connection with this stipulation shall be reimbursed to
5 Respondents. If this stipulation is not approved by the Commission, and if a full evidentiary hearing
6 before the Commission becomes necessary, neither any member of the Commission, nor the Executive
7 Director, shall be disqualified because of prior consideration of this Stipulation.

8 7. The parties to this agreement may execute their respective signature pages separately. A
9 copy of any party’s executed signature page including a hardcopy of a signature page transmitted via fax
10 or as a PDF email attachment is as effective and binding as the original.

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Dated: _____
Galena West, Chief of Enforcement
Fair Political Practices Commission

Dated: _____
Sonja Trauss, individually and on behalf of
San Francisco Bay Area Renters Political Action
Committee

1 The foregoing stipulation of the parties “In the Matter of San Francisco Bay Area Renters Political Action
2 Committee, and Sonja Trauss,” FPPC Case No. 15/1635 is hereby accepted as the final decision and order
3 of the Fair Political Practices Commission, effective upon execution below by the Chair.
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5 IT IS SO ORDERED.
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7 Dated: _____
8 Richard C. Miadich, Chair
9 Fair Political Practices Commission
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