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9 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**
10 **STATE OF CALIFORNIA**

11
12 In the Matter of:

13 REVERGE ANSELMO,

14 Respondents.
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FPPC Case No. 2022-00402

STIPULATION, DECISION, AND ORDER

Date Submitted to Commission: June 2025

16 **INTRODUCTION**

17 Respondent, Reverage Anselmo (“Anselmo”), is an individual who qualified as a major donor
18 committee and engaged in campaign activities in 2020, 2021, and 2022. The Political Reform Act (“the
19 Act”) ¹ requires major donor committees to timely file certain campaign statements and reports to
20 disclose their campaign activities. Anselmo violated the Act by failing to timely file semi-annual
21 campaign statements and 24-Hour Contribution Reports.

22 **SUMMARY OF THE LAW**

23 The Act and its regulations are amended from time to time. The violations in this case occurred
24 in 2020, 2021, and 2022. For this reason, all legal references and discussions of law pertain to the Act’s
25 provisions as they existed at that time.

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28 ¹ The Political Reform Act is contained in Government Code §§ 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practice Commission are contained in §§ 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

1 **Need for Liberal Construction and Vigorous Enforcement of the Act**

2 When enacting the Act, the people of California found and declared that previous laws regulating
3 political practices suffered from inadequate enforcement by state and local authorities.² Thus, it was
4 decreed that the Act “should be liberally construed to accomplish its purposes.”³

5 One purpose of the Act is to promote transparency by ensuring that receipts and expenditures in
6 election campaigns are fully and truthfully disclosed so that voters are fully informed and improper
7 practices are inhibited.⁴ Another purpose of the Act is to provide adequate enforcement mechanisms so
8 that the Act will be “vigorously enforced.”⁵

9 **Major Donor Committee**

10 Under the Act, “committee” means any person or combination of persons who directly or
11 indirectly makes contributions totaling \$10,000 or more in a calendar year to or at the behest of
12 candidates or committees.⁶ This type of committee is known as a major donor committee.

13 **Duty to File Semi-annual Campaign Statements**

14 All major donor and independent expenditure committees shall file semi-annual campaign
15 statements each year no later than July 31 for the period ending June 30, and no later than January 31 for
16 the period ending December 31, if they have made contributions or independent expenditures during the
17 six-month period before the closing date of the statements.⁷

18 **Duty to File 24-Hour Contribution Reports**

19 Under the Act, a “late contribution” includes a contribution that totals in the aggregate \$1,000 or
20 more and is made to or received by a candidate, a controlled committee, or a committee formed or
21 existing primarily to support or oppose a candidate or measure during the 90-day period preceding the
22 date of the election, or on the date of the election, at which the candidate or measure is to be voted on.⁸

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26 ² Section 81001, subd. (h).

27 ³ Section 81003.

⁴ Section 81002, subd. (a).

⁵ Section 81002, subd. (f).

28 ⁶ Section 82013, subd. (c).

⁷ Section 84200, subd. (b).

⁸ Section 82036, subd. (a).

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.⁹

Filing Due Dates

Whenever the Act requires that a statement or report be filed prior to or not later than a specified date, and the deadline falls on a Saturday, Sunday, or official state holiday, the filing deadline for such a statement or report shall be extended to the next regular business day.¹⁰

Disclosure of Campaign Activity

Each campaign statement must disclose the total amount of contributions made during the period covered by the campaign statement.¹¹

SUMMARY OF THE FACTS

Background

According to Anselmo's filed campaign statements, Anselmo qualified as a major donor committee individually for three separate calendar years in 2020, 2021, and 2022. Activity in 2020 related to both the March 3, 2020, Primary Election and November 3, 2020, General Election. Activity in 2021 and part of 2022 was related to the February 1, 2022, Recall Election in Shasta County. Activity in 2022 was related to the November 8, 2022, General Election. Anselmo first qualified as a major donor committee on February 24, 2020, upon making a \$100,000 contribution. In 2021, Anselmo qualified as a major donor committee on August 3, 2021, upon making a \$50,000 contribution. Finally, Anselmo qualified as a major donor committee in 2022 on February 21, 2022, upon making a \$180,000 contribution.

Failure to Timely File Campaign Statements

As a major donor committee, Anselmo was required to file semi-annual campaign statements for reporting periods in 2020 through 2022. In 2020, Anselmo was required to timely file semi-annual campaign statements for the reporting periods of January 1, 2020 to June 30, 2020 and July 1, 2020 to December 31, 2020 by the respective July 31, 2020 and February 1, 2021 due dates. Anselmo filed a

⁹ Section 84203.

¹⁰ Regulation 18116, subd. (a).

¹¹ Section 84211, subd. (a)-(b).

1 semi-annual campaign statement for the reporting period ending on June 30, 2020 on July 19, 2022,
2 after Enforcement contact. Anselmo reported \$110,000 in contributions on the semi-annual campaign
3 statement and incorrectly included a \$10,000 contribution that belonged on the campaign statement
4 with reporting period ending on December 31, 2020, which was never filed.

5 In 2021, Anselmo was required to file a semi-annual campaign statement for the reporting
6 period of January 1, 2021 through December 31, 2021, by January 31, 2022. A semi-annual campaign
7 statement for the reporting period of January 1, 2021 to June 30, 2021 was not required as no
8 contributions were made during the reporting period. Anselmo filed a semi-annual campaign statement
9 with a reporting period ending on December 31, 2021 on April 6, 2022, but incorrectly reported a
10 contribution in the amount of \$450,000 as being received on May 10, 2021 (a contribution of \$50,000
11 was made on August 11, 2021 and \$400,000 was made on November 9, 2021). An amendment was
12 filed on July 19, 2022 with corrected contribution dates.

13 Anselmo was required to timely file a semi-annual campaign statement for the reporting periods
14 of January 1, 2022 to June 30, 2022 and July 1, 2022 to December 31, 2022, due by August 1, 2022 and
15 January 31, 2023 respectively. Anselmo timely filed the campaign statement with a reporting period
16 ending on June 30, 2022 on July 19, 2022 and reported \$384,900 in contributions, but incorrectly wrote
17 the reporting period as January 1, 2022 to May 31, 2022. An amendment was filed on August 30, 2022
18 with a reporting period that was still incorrect stating from January 1, 2022 to June 1, 2022. Anselmo
19 did not file a campaign statement with a reporting period ending on December 31, 2022, despite
20 contributing \$100,000 to the Water Users Committee (“Water”) on September 28, 2022.

21 The late-filed semi-annual campaign statements are summarized below:

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Statement	Reporting Period	Due Date	Date Filed	Activity
Form 461	1/1/20-6/30/20	7/31/2020	7/19/22	\$100,000
Form 461	7/1/20-12/31/20	2/1/2021	Not Filed	\$10,000 ¹²
Form 461	1/1/21-12/31/21	1/31/2022	4/6/22	\$450,000
Form 461	7/1/22-12/31/22	1/31/2023	Not Filed	\$100,000

Failure to Timely File 24-Hour Contribution Reports

According to Anselmo's filed campaign statements, Anselmo was required to file one 24-Hour Contribution Report in 2020 related to the March 3, 2020, Primary Election and candidate Patrick Jones. The 90-day period preceding the March 3, 2020, Primary Election began on December 4, 2019.

Anselmo was also required to file one 24-Hour Contribution Report related to the June 7, 2022, Primary Election and candidate Baron Browning. The 90-day period preceding the June 7, 2022 Primary Election began on March 9, 2022. Below is a summary of the late-filed 24-Hour Contribution Reports:

Statement/Type	Reporting Period	Due Date	Date Filed	Activity
Form 497	2/24/2020	2/25/2020	Not Filed	\$100,000
Form 497	3/14/2022	3/15/2022	Not Filed	\$4,900

VIOLATIONS

Count 1: Failure to Timely File a Semi-Annual Campaign Statement

Anselmo failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2020 through June 30, 2020 by the July 31, 2020 deadline, in violation of Government Code Section 84200.

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¹² This contribution was incorrectly included on the semi-annual campaign statement for the 1/1/20-6/30/20 reporting period.

1 **Count 2: Failure to Timely File a Semi-Annual Campaign Statement**

2 Anselmo failed to timely file a semi-annual campaign statement for the reporting period of July
3 1, 2020 through December 31, 2020 by the February 1, 2021 deadline, in violation of Government Code
4 Section 84200.

5 **Count 3: Failure to Timely File a Semi-Annual Campaign Statement**

6 Anselmo failed to timely file a semi-annual campaign statement for the reporting period of
7 January 1, 2021 through December 31, 2021 by the January 31, 2022 deadline, in violation of
8 Government Code Section 84200.

9 **Count 4: Failure to Timely File a Semi-Annual Campaign statement**

10 Anselmo failed to timely file a semi-annual campaign statement for the reporting period of July
11 1, 2022 through December 31, 2022 by the January 31, 2023 deadline, in violation of Government Code
12 Section 84200.

13 **Count 5: Failure to Timely File a 24-Hour Contribution Report**

14 Anselmo failed to timely file one 24-Hour Contribution Report to disclose a contribution made
15 totaling \$100,000 by the February 25, 2020 due date, in violation of Government Code Section 84203.

16 **Count 6: Failure to Timely File a 24-Hour Contribution Report**

17 Anselmo failed to timely file one 24-Hour Contribution Report to disclose a contribution made
18 totaling \$4,900 by the March 15, 2022 due date, in violation of Government Code Section 84203.

19 **PROPOSED PENALTY**

20 This matter consists of six counts. The maximum penalty that may be imposed is \$5,000 per
21 count. Thus, the maximum penalty that may be imposed here is \$30,000.¹³

22 This matter does not qualify for the Streamline Program.¹⁴ While the late-filing of campaign
23 statements and late reporting of campaign activity can be included in the Streamline Program, activity
24 totaling over \$50,000 on a late-filed campaign statement or report and activity totaling over \$50,000 that
25 is unreported on a campaign statement or report makes these violations ineligible for the Streamline
26 Program. In addition, because the late-filing and late-reporting of campaign statements and reports with
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28 ¹³ Section 83116, subd. (c).

¹⁴ Regulations 18360.1, subd. (a) and 18360.2, subd. (a).

over \$50,000 in activity are excluded, the late-filing of campaign statements and reports for activity under \$50,000 in this matter is also excluded from the Streamline Program.

In determining the appropriate penalty for a particular violation of the Act, the Enforcement Division considers the typical treatment of a violation in the overall statutory scheme of the Act, with an emphasis on serving the purposes and intent of the Act. Additionally, the Enforcement Divisions considers the facts and circumstances of the violation in the context of the following factors set forth in Regulation 18361.5 subdivision (e)(1) through (8): (1) The extent and the gravity of the public harm caused by the specific violations; (2) The level of experience of the violator with the requirements of the Political reform Act; (3) Penalties previously imposed by the Commission in comparable cases; (4) The presence or absence of any intention to conceal, deceive, or mislead; (5) Whether the violation was deliberate, negligent, or inadvertent; (6) Whether the violator demonstrated good faith by consulting the Commission, staff or any other governmental agency in a manner not constituting complete defense under Government Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern or whether the violator has a prior record of violations of the Political Reform Act or similar law; (8) Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide full disclosure.¹⁵

The public harm inherent in campaign late-filing and late-reporting violations is that the public is deprived of important, time-sensitive information regarding campaign activity. Here, Anselmo engaged in over one million dollars in political activity over a three-year period and failed to timely file numerous campaign statements and reports, including failing to file two 24-Hour Contribution Reports before the relevant elections.

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

- *In the Matter of Kieu Hoang; FPPC No. 2020-0203.* Respondent was a major donor and independent expenditure committee. As a major donor committee, among other violations, Hoang failed to timely file two semi-annual campaign statements and three 24-Hour Contribution Reports. On April 25, 2024, the Commission approved a penalty of

¹⁵ Regulation 18361.5, subd. (e).

\$16,000 for four counts of failing to timely file semi-annual campaign statements (ranging from \$2,500-\$4,500 per count) and \$11,500 for three counts for failing to timely file 24-Hour Contribution Reports (ranging from \$2,500-\$4,500 per count).

Counts 1-4:

A slightly lower penalty than in the *Hoang* case is recommended for most of the counts related to late-filing of campaign statements. Here, Anselmo failed to timely file four semi-annual campaign statements disclosing contributions made during 2020 to 2022 totaling \$10,000-\$450,000 in activity per campaign statement, a significantly lower amount than at issue in *Hoang*. However, like *Hoang*, these statements were generally either filed extremely late and after the relevant election or never filed at all. In Count 2, a lower penalty amount (similar to *Hoang*'s Count 4) is recommended as the activity is significantly lower (\$10,000) and the contribution was later reported on a campaign statement for the wrong reporting period. A similar penalty amount to *Hoang* is recommended for Count 3 as the amount at issue is considerable (\$450,000).

Counts 5-6:

Here, a similar penalty amount to *Hoang*'s Count 7 is recommended for Count 5. In Count 5, Anselmo failed to timely file a 24-Hour Contribution Report for a contribution of \$100,000. Like *Hoang*, this report was never filed and the semi-annual campaign statement recording this contribution was filed much later after the election. Anselmo also failed to file a 24-Hour Contribution Report for a contribution in the amount of \$4,900 prior to the election (Count 6). In mitigation for Count 6, a semi-annual campaign statement reporting this contribution was timely filed and this amount is significantly lower than the amounts in *Hoang*. Therefore, a significantly lower penalty is recommended for Count 6.

In aggravation of all counts, Anselmo is experienced as a major donor and has a prior history for the same violation. On August 22, 2013, a Streamline stipulation was approved by the Commission for failing to timely file two major donor semi-annual campaign statements (2 Counts).¹⁶

In mitigation of all counts, Anselmo cooperated with the investigation and there is no confirmation that Anselmo received a major donor notification from any of the recipient committees

¹⁶ FPPC Case No. 2013-0238, Seven Hills Land and Cattle Company, LLC and Reverse Anselmo.

they donated to in 2020 to 2022. Additionally, Anselmo's failure to timely file 24-Hour Contribution Reports is mitigated because all of Anselmo's campaign activity was disclosed by the recipient committees prior to the relevant elections on pre-election campaign statements and/or 24-Hour Contribution Reports.

Based on the factors outlined above, the Enforcement Division is seeking a penalty of \$21,500.

Based on the foregoing, the following penalties are recommended:

Count #	Violation	Penalty Amount
1	Failure to Timely File Semi-Annual Campaign Statements	\$4,000
2	Failure to Timely File Semi-Annual Campaign Statements	\$2,500
3	Failure to Timely File Semi-Annual Campaign Statements	\$4,500
4	Failure to Timely File Semi-Annual Campaign Statements	\$4,000
5	Failure to Timely File 24-Hour Report	\$4,500
6	Failure to Timely File 24-Hour Report	\$2,000
	Total:	\$21,500

CONCLUSION

Complainant, the Enforcement Division of the Fair Political Practices Commission, and Respondent, Reverage Anselmo, hereby agree as follows:

1. Respondent 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. Respondent understands and hereby knowingly and voluntarily waives, 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 the Respondents' own expense, to confront and cross-examine all witnesses testifying at the hearing, to subpoena witnesses to testify at the hearing, to

1 have an impartial administrative law judge preside over the hearing as a hearing officer, and to have the
2 matter judicially reviewed.

3 5. The Respondent agrees to the issuance of the decision and order set forth below. Also,
4 the Respondent agrees to the Commission imposing against it an administrative penalty in the amount of
5 \$21,500. One or more cashier's checks or money orders totaling said amount—to be paid to the General
6 Fund of the State of California—is/are submitted with this stipulation as full payment of the
7 administrative penalty described above, and same shall be held by the State of California until the
8 Commission issues its decision and order regarding the matter.

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

15 7. The parties to this agreement may execute their respective signature pages separately. A
16 copy of any party's executed signature page including a hard copy of a signature page transmitted via
17 fax or as a PDF email attachment is as effective and binding as the original.

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19 Dated: _____
20 Angela J. Brereton, Assistant Chief of Enforcement
21 Fair Political Practices Commission

22 Dated: _____
23 Reverage Anselmo, individually

1 The foregoing stipulation of the parties “In the Matter of Reverage Anselmo” FPPC Case No.
2 2024-00402, is hereby accepted as the final decision and order of the Fair Political Practices
3 Commission, effective upon execution below by the Chair.

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5 IT IS SO ORDERED.

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7 Dated: _____

_____ Adam E. Silver, Chair
Fair Political Practices Commission