STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811 • (916) 322-5660

EXECUTIVE STAFF REPORTS

August 20, 2026 Commission Hearing

I. ENFORCEMENT DIVISION

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

A. Overview

During the period of June 1, 2026, through July 31, 2026, the Enforcement Division received the following complaints and referrals:

	Sworn	Non-Sworn	Anonymous	Referrals
Number Received	69	33	90	247

For the months of June and July, more time to respond beyond the 14-day statutory period was needed for approximately 39 sworn complaints.

Additionally, for the months of June and July, the Enforcement Division opened 236 cases, rejected 201 complaints and referrals, and closed a total of 173 cases including:

- 85 warning letters – advertisement violations (1), behested payment violations (1), statement of economic interests violations (72) and campaign violations (11);
- 40 no action closure letters: PREP completed –advertisement violations (7), statement of economic interests violations (23), and campaign violations (10);
- 14 no action closure letters alleging – conflict of interest violations (1), advertisement violations (4), campaign violations (3), and statement of economic interests violations (6);
- 19 approved stipulations from the June Commission Meeting;
- 3 approved defaults from the March Commission Meeting;
- 1 advisory letter;
- 10 administrative terminations;
- 1 case closed as duplicates.

The Division had a total of 968 cases in various stages of resolution at the time of the June Monthly Report and currently has approximately 1,031 cases in various stages of resolution, including the 22 streamline, 6 mainline, and 1 pre-notice default cases before the Commission as listed in the August Agenda. Net case openings since the last monthly report totaled 63.

B. Annual Statistics

The following is a chart that details the annual statistics for enforcement complaints, referrals and cases over the past five years. The statistics show a marked increase in complaints during election years. 2025 stands out with an increase in complaints received and a decrease in referrals received compared to other non-election years.

	Year	2021	2022	2023	2024	2025
1	Complaints Received	606	1,379	653	1,456	910
2	Complaints Processed	820	1,050	916	1,334	902
3	Referrals Received	1,751	1,724	1,971	1,393	1,518
4	Referrals Processed	1,539	1,183	1,441	2,171	1,729
5	Total Complaints and Referrals Received	2,357	3,103	2,624	2,849	2,428
6	Cases opened	1,185	990	831	1,403	1,302
7	Cases closed[3]	1,058	1,075	1,295	1,536	1,268
8	Cases with penalties[1]	269	161	98	149	97
	a Streamlines	234	142	79	117	73
	b Mainlines	32	14	17	25	20
	c Defaults	3	5	2	7	3
9	Total fines imposed	$472,248	$617,548	$376,531	$802,238	$543,539
10	Warning letters issued	475	681	813	847	741
11	Administrative terminations	59	53	87	80	40
12	Cases closed with violations found[2]	803	895	998	1,076	878
13	Advisory letters issued	16	8	15	12	3
14	No action closure letters	237	217	296	469	383
	a PREP Completed	--	39	86	261	263

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.

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[1] Total for lines 8a, 8b, and 8c.
[2] Total for lines 8, 10, and 11.
[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.

	June 2025	September 2025	December 2025	March 2026	June 2026	Difference in Existing Caseload Overall
2018	1	1	1	1	1	**-0**
2019	8	8	6	5	4	**-4**
2020	14	11	9	5	3	**-11**
2021	42	33	30	25	17	**-25**
2022	104	91	83	79	67	**-37**
2023	154	148	133	120	113	**-41**
2024	295	270	251	242	220	**-75**
2025	--	--	--	301	265	**-36**

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.

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: Kevin Cornwall, 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 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 semiannual campaign statement, in violation of Government Code Section 84211 (3 counts), failed to process thousands of dollars in expenditures through the campaign bank account, in violation of Government Code Section 85201 (2 counts), and failed to maintain adequate campaign records, in violation of Government Code Section 84104 (1 count). **Total Penalty: $2,021 (Tiers One and Two).**

Failure to Properly Recuse

In the Matter of Doria Robinson, FPPC No. 25/236. Staff: Theresa Gilbertson, Attorney Supervisor and Paul Rasey, Special Investigator. Doria Robinson is a city councilmember for the City of Richmond. On October 3, 2023, Robinson improperly recused from a governmental decision in which Robinson had a conflict of interest. Robinson left the room during the governmental decision but failed to identify, on the record, the financial interest that gave rise to the conflict of interest, in violation of Government Code section 87105 (1 count). **Total Penalty: $400 (Tier One).**

Recordkeeping

In the Matter of Re-Elect Hudson 4 San Ramon Mayor 2022, David Hudson, and Barbara Hudson; FPPC No. 25/955. Staff: Jaleena Evans, Commission Counsel. This matter arose from an audit performed by the Franchise Tax Board's Political Reform Audit Program. David Hudson was an unsuccessful candidate for Mayor in the November 8, 2022 General Election. Re-Elect Hudson 4 San Ramon Mayor 2022 was Hudson's candidate-controlled committee. Barbara Hudson served as the Committee's treasurer. The Committee and Hudson failed to timely report employer and/or occupation information for contributors on four campaign statements, in violation of Government Code Section 84211 (4 counts), and failed to maintain records for calendar years 2021 and 2022 (2 counts). **Total Penalty: $1,600 (Tier Two).**

In the Matter of The Committee for Better Government, Ted Davis, and Jack Murphy; FPPC No. 20/1003. Staff: Laura Columbel, Senior Commission Counsel and Alethea Perez, Special Investigator. The Committee for Better Government was a county general purpose committee. Jack Murphy served as the Committee's treasurer and Ted Davis served as the Committee's principal officer. The Committee, Davis, and Murphy failed to maintain adequate records for contributions and independent expenditures for the calendar years 2021, 2022, and 2023, in violation of Government Code Section 84104 (3 counts). The Committee and Murphy failed to timely file two pre-election statements, seven semiannual statements, and four 24-Hour Reports for independent expenditures, in violation of Government Code Sections 84200, 84200.5, and 84204 (13 counts). **Total Penalty: $1,356 (Tier One).**

Advertisements

In the Matter of Peterson School Board Trustee Area 4 2023, Aaron Peterson, Rick Reyes, and Julio Lara; FPPC No. 23/755. Staff: Kendall L.D Bonebrake, Chief of Enforcement and Shaina Elkin, Intake Manager. Aaron Peterson was an unsuccessful candidate for the Claremont Unified School District in the July 25, 2023 Special Election. Peterson School Board Trustee Area 4 2023 was Peterson's candidate-controlled committee. Rick Reyes served as treasurer, and Julio Lara served as principal officer. The Committee, Peterson, and Reyes failed to timely file two 24-Hour Reports, in violation of Government Code Section 84203 (2 counts). The Committee, Peterson, and Lara failed to include the proper advertisement disclosures on social media cover pages, in violation of Government Code Sections 84504.3 and 84502 (2 counts). **Total Penalty: $480. (Tier One).**

Campaign Late Filer/Reporter

In the Matter of Patty Padilla-Salsberg for SUHSD Board of Trustees 2020, Patricia "Patty" Padilla-Salsberg, and Aaron Salsberg; FPPC No. 21/246. Staff: Vanessa Jimmy, Commission Counsel and Jay Gehres, Special Investigator. Patricia "Patty" Padilla-Salsberg was a successful candidate for the Salinas Union High School Board of Trustees in the November 3, 2020 General Election. Patty Padilla-Salsberg for SUHSD Board of Trustees 2020 was Padilla-Salsberg's candidate-controlled committee. Aaron Salsberg served as the Committee's treasurer. The Committee and Salsberg failed to timely file a statement of organization to report its date of qualification, in violation of Government Code Section 84101 (1 count), failed to timely file two pre-election campaign statements, in violation of Government Code Sections 84200.5 and 84200.8 (2 counts), failed to timely file two 24-Hour Reports, in violation of Government Code Section 84203 (2 counts), failed to timely file two semiannual campaign statements, in violation of Government Code Section 84200 (2 counts), and impermissibly accepted cash contributions over $100, in violation of Government Code Section 84300 (3 counts). **Total Penalty: $6,236 (Tiers One and Two).**

In the Matter of Stand Up Santa Barbara PAC and Elrawd MacLearn; FPPC No. 22/485. Staff: Theresa Gilbertson, Attorney Supervisor and Kaitlin Osborn, Special Investigator. Stand Up Santa Barbara PAC was a general purpose committee. Elrawd MacLearn was the treasurer. The Committee failed to timely file campaign statements and reports, including a semiannual campaign statement, a pre-election campaign statement, and four 24-Hour Reports, in violation of Government Code sections 84200, 84200.5, and 84203. (6 counts). Further, the Committee and MacLearn failed to maintain all required source documentation for contributions and expenditures for the calendar years 2021 and 2022, in violation of Government Code section 84104. (2 counts). The Committee and MacLearn accepted a prohibited cash contribution of $300 in 2021, in violation of 85300 (1 count). **Total Penalty: $3,547 (Tiers One and Two).**

In the Matter of Dr. Allen for Insurance Commissioner 2022, Vinson Eugene Allen, and David L. Gould; FPPC No. 23/607. Staff: Chance Felkins, Commission Counsel. This matter arose from an audit carried out by the Franchise Tax Board's Political Reform Audit Division. Dr. Allen for Insurance Commissioner is a state candidate-controlled committee. The Committee's treasurer is David L. Gould, and the candidate is Vinson Eugene Allen. The Committee failed to maintain receipts, invoices, credit card statements with supporting statements for 39 expenditures made totaling $195,339; and sub vendor payment totaling $125,959, in violation of Government Code Section 84104 (1 count). Additionally, the Committee failed to timely file a 10-day contribution report after the Committee received a loan for $90,00 from the candidate, by the applicable deadline, in violation of Government Code Section 85309(c) (1 count). **Total Penalty $3,400 (Tier Two).**

In the Matter of Humboldt Cannabis Reform Initiative, Yes on A; Aubrey Thurmond; Mark Thurmond; and Elizabeth Watson; FPPC No. 24/089. Staff: Chance Felkins, Commission Counsel. Respondents represented by Gary Winuk of Kaufman Legal Group. This matter arose from a sworn complaint. Humboldt Cannabis Reform Initiative, Yes on A is a primarily formed ballot measure Committee. Aubrey Thurmond, Mark Thurmond and Elizabeth Watson serve as principal officers of the Committee. Elizabeth Watson also serves as the Committee's treasurer. The Committee failed to timely file a statement of organization, in violation of Government Code Section 84101 (1 count), failed to timely file an odd year quarterly campaign statement, in violation of Government Code Section 84200 (1 count); failed to timely file two 24-Hour Reports, in violation of Government Code Section 84203 (2 counts); and failed to timely disclose specific contribution amounts on three semiannual campaign statements, in violation of Government Code Section 84211(f)(5) (3 counts). **Total Penalty: $2,869. (Tier Two).**

In the Matter of Yazmin Llamas for Contra Costa Board of Education 2024 and Yazmin Llamas; FPPC No. 24/1282. Staff: Jonathan Rivera, Commission Counsel. Yazmin Llamas is represented by Gary Winuk of Kaufman Legal Group. Llamas was a successful candidate for the Contra Costa Board of Education in 2024. Yazmin Llamas for Contra Costa Board of Education 2024 was the candidate's candidate-controlled committee. The Committee and Llamas failed to timely file one 24-Hour Report, in violation of Government Code Section 84203 (1 count). **Total Penalty: $2,200 (Tier Two).**

In the Matter of Royal Business Bank, FPPC No. 23/773. Staff: Neal Bucknell, Senior Commission Counsel and Roone Petersen, Special Investigator. Respondent Royal Business Bank is represented by Michael L. Wong of Willkie Farr & Gallagher, LLP. In this matter, Royal Business Bank qualified as a major donor, but failed to file required semiannual campaign statements, in violation of Government Code Section 84200, subdivision (b) (2 counts)—and failed to file a required 24-Hour report, in violation of Government Code Section 84203 (1 count). **Total Penalty: $600 (Tier One).**

Statement of Economic Interests Late Filer/Reporter

In the Matter of Kevin Riley; FPPC No. 26/160. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Kevin Riley, a Planning Commissioner for the City of Antioch, failed to timely file a 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Penalty: $800 (Tier Two).**

In the Matter of Mike Kozlowski; FPPC No. 25/662. Staff: Alex Rose, Senior Commission Counsel. Mike Kozlowski, as a Folsom City Council Member and Alternate Member and Member of the Board of Directors, Elk Grove-Rancho Cordova-EL Dorado, failed to timely file a 2022, 2024, and 2025 Annual Statements of Economic Interests, in violation of Government Code Sections 87203 and 87300 (3 counts). **Total Penalty: $600 (Tier One).**

In the Matter of Rod Houser; FPPC No. 24/1393. Staff: Jack Blattner, Commission Counsel. Rod Houser, Consultant for the City of Santa Rosa's Water Department, failed to timely file a 2021 Annual Statement of Economic Interests and a Leaving Office Statement of Economic Interest, in violation of Government Code Section 87300 (2 counts). **Total Penalty: $600 (Tier One).**

In the Matter of Luhua Cheng; FPPC No. 23/711. Staff: Theresa Gilbertson, Attorney Supervisor and Joselyne Soto, Associate Governmental Program Analyst. Luhua Cheng, as a Primary Care Physician for the County of Santa Clara, failed to timely file the 2021 and 2023

Annual Statements of Economic Interests, in violation of Government Code Section 87300 (2 counts). **Total Penalty: $400 (Tier One).**

In the Matter of Masaru Oshita; FPPC No. 26/382. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Masaru Oshita, a Commission Member for the Emergency Medical Services Authority Commission, failed to timely file a 2024 Annual and 2025 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (2 counts). **Total Penalty: $400 (Tier One).**

In the Matter of Samuel Burton; FPPC No. 26/128. Staff: Alex Rose, Senior Commission Counsel. Samuel Burton, as a Blythe City Council Member, failed to timely file a 2024 and 2025 Annual Statements of Economic Interests, in violation of Government Code Section 87203 (2 counts). **Total Penalty: $400 (Tier One).**

In the Matter of Timothy Banuelos; FPPC No. 25/634. Staff: Theresa Gilbertson, Attorney Supervisor and Joselyne Soto, Associate Governmental Program Analyst. Timothy Banuelos, as Planning Commissioner for the City of Pinole, failed to timely file the 2023 Annual and Leaving Office Statements of Economic Interests, in violation of Government Code Section 87203 and 87204 (2 counts). **Total Penalty: $400 (Tier One).**

In the Matter of Dale Beatty; FPPC No. 26/607. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Dale Beatty, an Alternate Committee Member for the Emergency Medical Care Committee, failed to timely file a 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Penalty: $200 (Tier One).**

In the Matter of Joanna Rees; FPPC No. 26/419. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Joanna Rees, a Board Member for the Workforce Development Board, failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Penalty: $200 (Tier One).**

Lobbying Reporting

In the Matter of Mountain Recreation and Conservation Authority and Rorie Skei; FPPC No. 26/074. Staff: Chance Felkins, Commission Counsel. Mountain Recreation and Conservation Authority ("MRCA") is a lobbyist employer. Rorie Skei is the organization's Chief Deputy Executive Officer. MRCA failed to timely file ten lobbyist employer quarterly reports, in violation of Government Code Section 86117 (10 counts). **Total Penalty: $16,980 (Tier Two).**

In the Matter of International Interior Design Association, Northern California Chapter Inc. and Veronica Vaskinn; FPPC No. 25/1203. Staff: Chance Felkins, Commission Counsel. Respondents are represented by KC Jenkins of Bell, McAndrews & Hiltachk, LLP. International Interior Design Association, Northern California Chapter Inc. ("IIDA") is a lobbyist employer. Veronica Vaskin is the organization's Chapter Administrator. IIDA failed to timely file ten

lobbyist employer quarterly reports, in violation of Government Code Section 86117 (10 counts).
Total Penalty: $10,800 (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 June 1, 2026, to July 31, 2026, the Audits and Assistance Division adopted six audit report, three with findings and three with no findings. Currently, the team has 43 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.

Details of the audit reports adopted are as follows:

1. **Richard Fuentes for CalPERS Board 2022 (ID# 1441141)**
    - **Finding 1: Form 501 Candidate Intention Statement Not Filed with CalPERS** and **Filed Late with the SOS.**

      A Form 501 Candidate Intention Statement was not filed with CalPERS prior to the receipt of contributions on August 31, 2021. The Form 501 Candidate Intention Statement was filed with the Secretary of State (SOS) on September 7, 2021, 7 days after the first contribution was received.

    - **Finding 2: Copies of the Form 410 Statement of Organization (Form 410) Not Filed with CalPERS, and Filed Late with the SOS**

      Copies of six Form 410s were not filed with CalPERS, including an amended Form 410. Three Form 410s were filed between 161 and 163 days late with the SOS.

    - **Finding 3: Copies of Form 460 Campaign Disclosure Statements Not Filed with CalPERS, Five Not Filed in Paper with SOS, and Three Filed Late with the SOS**

Copies of eleven Form 460 Campaign Disclosure Statements were not filed with CalPERS, including amended statements. Five Form 460 Campaign Disclosure Statements were not filed in paper with SOS, and three were filed between 4 and 13 days late with the SOS.

- **Finding 4: Copies of Form 497 Late Contribution Reports Not Filed with CalPERS and Filed Late with the SOS**

  Copies of six Form 497 Late Contribution Reports were not filed with CalPERS, including an amended Form 497 Late Contribution Report. One was not filed with SOS, and three were filed between 1 and 81 days late with SOS.

- **Finding 5: Subvendor Information Not Disclosed**

  For expenditures examined, subvendor information was not disclosed for a payment totaling $28,500. The subvendor, StackAdapt, provided advertising services from April 1, 2022 to May 16, 2022.

2. Margaret Brown for CalPERS Board 2021 (ID# 1421630)

- **Finding 1: Amendment to Form 410 Statement of Organization Not Filed Timely with the Secretary of State or CalPERS**

  An amendment to the Form 410 Statement of Organization was not filed with the Secretary of State or CalPERS within 10 days of qualifying as a committee. The amendment to the Form 410 Statement of Organization, due on February 21, 2020, was not filed until February 18, 2021 with the Secretary of State, 363 days late. The amendment to the Form 410 Statement of Organization, due on February 21, 2020, was not filed until November 18, 2021 with CalPERS, 636 days late.

- **Finding 2: Form 460 Semi-annual Statement Not Filed with CalPERS**

  A Form 460 Semi-annual Statement for the period ending June 30, 2020, was not filed with CalPERS. Receipts and expenditures for the period totaled $4,700 and $1,153, respectively. The statement was timely filed in paper and electronically with the Secretary of State.

- **Finding 3: Form 497 Late Contribution Reports Filed Late with the Secretary of State**

  Form 497 Contribution Reports were filed with the Secretary of State between 6 and 7 days late for 2 contributions received totaling $6,075. Of this amount, $4,000 was received on the election day but reported after the election. Reports were timely filed for 4 contributions received totaling $28,300.

- **Finding 4: Unallowable Monetary Contributions Received**

  A contribution totaling $4,773 was received on July 3, 2021 from Margaret Brown Legal Defense Fund ID# 1426091 prior to the September 27, 2021 CalPERS Board of Administration Member-at-Large Election; this is not a permissible use of remaining legal defense funds. Refunds were made to three contributors totaling $2,088 and disclosed as "Refund of Contribution" on the Form 460 Termination Statements for the period ending December 9, 2021.

3. Christian Shaughnessy for San Bernardino City Council 2022 (ID# 1440239)

- **Finding 1: Forms 410 Statement of Organization Not Filed Timely with the San Bernardino City Clerk and SOS**

  Two Forms 410 Statement of Organization were filed late with the San Bernardino City Clerk and one Form 410 Statement of Organization was filed late with the SOS. The first Form 410 Statement of Organization, due on September 13, 2021, was not filed until February 23, 2022 with the San Bernardino City Clerk, 163 days late, but was filed on time with the SOS on August 9, 2021. The second Form 410 Statement of Organization, due on September 13, 2021, was not filed until October 7, 2021 with the San Bernardino City Clerk, 24 days late. The second Form 410 Statement of Organization, due on September 13, 2021, was not filed until October 21, 2021 with the SOS, 38 days late.

- **Finding 2: Form 410 Statement of Organization Information Not Disclosed Timely**

  The financial institution where the campaign bank account is located was not included on the initial Form 410 Statement of Organization filed before the committee qualified or the amended Form 410 Statement of Organization filed after the committee qualified. The committee provided information on the financial institution where the campaign bank account is located on the termination Form 410 Statement of Organization filed with the San Bernardino City Clerk on October 27, 2022 and with the SOS on November 30, 2022.

- **Finding 3: Forms 460 Semi-annual Campaign Statement Filed with Incorrect Periods**

  The Form 460 Semi-annual Statement for the period ending December 31, 2021, due at the San Bernardino City Clerk on January 31, 2022, was filed on January 24, 2022. The Form 460 Preelection Statement for the period ending December 31, 2021 was incorrectly filed as the Form 460 Preelection Statement covering the period from July 1, 2021 to December 31, 2021, not January 1, 2021 to December 31, 2021.

An amendment to the Form 460 Semi-annual Statement for the period ending December 31, 2021, due at the San Bernardino City Clerk on January 31, 2022, was filed after the election on August 9, 2022. The Form 460 Preelection Statement for the period ending December 31, 2021 was incorrectly filed as the Form 460 Preelection Statement covering the period from September 2, 2021 to December 31, 2021, not January 1, 2021 to December 31, 2021.

Another amendment to the Form 460 Semi-annual Statement for the period ending December 31, 2021, due at the San Bernardino City Clerk on January 31, 2022, was filed after the election on July 17, 2023. The Form 460 Preelection Statement for the period ending December 31, 2021 was incorrectly filed as the Form 460 Preelection Statement covering the period from September 2, 2021 to December 31, 2021, not January 1, 2021 to December 31, 2021.

- **Finding 4: Forms 460 Preelection and Semi-annual Campaign Statements Not Filed Timely with the San Bernardino City Clerk**

  The Form 460 Preelection Statement for the period ending April 23, 2022, due at the San Bernardino City Clerk on April 28, 2022, was filed on July 17, 2023, after the election. A Form 460 Semi-annual Statement was filed on August 9, 2022 for the period from January 1, 2022 through July 31, 2022 with the campaign activity from January 1, 2022 through April 23, 2022 included. Receipts and expenditures during this period totaled $8,338 and $3,517, respectively.

  The Form 460 Preelection Statement for the period ending May 21, 2022, due at the San Bernardino City Clerk on May 26, 2022, was filed on July 17, 2023, after the election. A Form 460 Semi-annual Statement was filed on August 9, 2022 for the period from January 1, 2022 through July 31, 2022 with the campaign activity from April 24, 2022 through May 21, 2022 included. Receipts and expenditures during this period totaled $5 and $136, respectively.

  The Form 460 Semi-annual Statement for the period ending June 30, 2022, due at the San Bernardino City Clerk on August 1, 2022, was filed on July 17, 2023, after the election. A Form 460 Semi-annual Statement was filed on August 9, 2022 for the period from January 1, 2022 through July 31, 2022 with the campaign activity from May 22, 2022 through June 30, 2022 included. Receipts and expenditures during this period totaled $0 and $10,570, respectively.

- **Finding 5: Monetary Contributions Not Disclosed Timely**

  Monetary contributions received totaling $8,100 were not disclosed on the Form 460 Campaign Disclosure Statements filed with the San Bernardino City Clerk for the period January 1, 2022 through April 23, 2022 until amendments were filed on July 17, 2023, after the pertinent election.

- **Finding 6: Expenditures Not Disclosed Timely**

  Expenditures were understated by $1,635 on the Form 460 Campaign Disclosure Statement filed for the period January 1, 2021 through December 31, 2021. An amendment was filed after the election on August 9, 2022, and expenditures were understated by $21 on that statement. Another amendment was filed after the election on July 17, 2023, and expenditures were overstated by $35 on that statement.

  Expenditures totaling $3,674 were not disclosed on the Form 460 Campaign Disclosure Statements filed. Amendments were filed on July 17, 2023, after the election, to disclose the total payments made. An amendment to Form 460 was filed after the election for the period January 1, 2022 through April 23, 2022, and expenditures were understated by $36 on the statement. An amendment to Form 460 was filed after the election for the period April 24, 2022 through May 21, 2022, and unitemized expenditures were understated by $20 on the statement.

- **Finding 7: Accrued Expenses Not Disclosed Timely**

  Accrued expenses totaling $1,067 were not reported when incurred and were not disclosed until after the election. Of this amount, $1,054 was required to be disclosed on the Form 460 Semi-Annual Statement for the period ending December 31, 2021.

4. Hertzberg for State Controller 2022 (ID# 1413987)

- **No findings noted.**

5. Vazquez for State Board of Equalization 2022 (ID# 1417133)

- **No findings noted.**

6. Malia Cohen for State Board of Equalization 2022 (ID# 1414911)

- **No findings noted.**

III. LEGAL DIVISION

STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

City of Norco v. FPPC, Superior Court, County of Sacramento, Case No. 25WM000226. Petitioner City of Norco (City) filed a petition for writ of mandate on December 18, 2025 challenging the Commission's decision finding that the City violated the Act by failing to disclose campaign expenditures for a City ballot measure. The City seeks to set aside the Commission's decision, including the administrative penalty of $20,000. The Attorney General is representing the Commission. The FPPC filed an answer on March 26, 2026. The court has not set a hearing date.

B. Outreach and Training

Webinars & Workshops

- June 4, the FPPC presented a Behested Payments (Form 803) webinar. Senior Commission Counsel Karen Harrison and Education & External Affairs Unit Manager Chloe Hackert presented. 21 people attended.
- June 9, the FPPC presented a Candidate/Treasurer webinar. Political Reform Consultants Christian Durham and Alexandra Miner presented. 32 people attended.
- June 10, the FPPC presented a Statement of Economic Interests Filing Officer webinar. Political Reform Consultants Alexandra Miner and Kathryn Ito presented. 45 people attended.
- June 17, the FPPC presented a Campaign Filing Officer webinar. Political Reform Consultants Kathryn Ito and Stephen Hernandez presented. 29 people attended.
- June 22, the FPPC presented a Candidate/Treasurer – Getting Started workshop requested by the County of Contra Costa. Political Reform Consultants Alexandra Miner and Stephen Hernandez presented. 10 people attended.
- June 23, the FPPC presented a Candidate/Treasurer – Getting Started webinar requested by the County of Contra Costa. Political Reform Consultant Christian Durham presented. 6 people attended.
- June 24, the FPPC presented a Candidate/Treasurer – Getting Started webinar requested by the County of Contra Costa. Political Reform Consultant Christian Durham presented. 6 people attended.
- June 26, the FPPC presented at the California Political Treasurers Association (CPTA) annual conference. Senior Commission Counsel Karen Harrison, Senior Commission Counsel Zachary Norton, Senior Commission Erika Boyd, and Education & External Affairs Unit Manager Chloe Hackert presented. Approximately 100 people attended.
- June 30, the FPPC presented a Completing Campaign Forms 460/497 webinar. Political Reform Consultants Stephen Hernandez and Christian Durham presented. 54 people attended.

- July 8, the FPPC presented a Candidate/Treasurer – After the Election webinar. Political Reform Consultants Alexandra Miner and Kathryn Ito, presented. 14 people attended.
- July 14, the FPPC presented a Candidate/Treasurer webinar. Political Reform Consultants Alexandra Miner and Stephen Hernandez, presented. 44 people attended.
- July 16, the FPPC presented a Completing Campaign Forms 460/497 webinar. Political Reform Consultants Christian Durham and Kathryn Ito, presented. 31 people attended.
- July 21, the FPPC presented a General Purpose Committee webinar. Political Reform Consultants Kathryn Ito and Christian Durham, presented. 13 people attended.
- July 23, the FPPC presented a Campaign Filing Officer webinar. Political Reform Consultants Stephen Hernandez and Alexandra Miner, presented. 37 people attended.
- July 29, the FPPC presented a Candidate/Treasurer webinar requested by the City of Anaheim. Political Reform Consultant Stephen Hernandez and Telephone Advice & Education Outreach Manager Vanessa Manriquez, presented. 37 people attended.

Scheduled Webinars & Workshops

- August 18, the FPPC is presenting a Candidate/Treasurer – Getting Started webinar.
- August 19, the FPPC is presenting a Completing Campaign Forms 460/497 webinar.
- August 25, the FPPC is presenting a Campaign Filing Officer webinar.

Video Tutorials

Commission video tutorials were accessed a total of 495 times in June and 786 times in July. Form 700 videos were accessed 242 times in June and 321 in July, the Candidate/Treasurer video was accessed 154 times in June and 332 times in July, the filing officer videos were accessed 44 times in June and 78 times in July and the new Behested Payments (Form 803) video was accessed 55 times in June and 55 times in July.

C. New and Updated Educational Resources

- New Behested Payments (Form 803) Video Tutorial

D. Political Reform Education Program (PREP):

June

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments	Withdrawals
Statement of Economic Interests Course	9	15	1	14	0
Campaign Course for Local Candidates and	6	1	0	13	0

Candidate-Controlled Committees					
Campaign Course for State Candidates and Candidate-Controlled Committees	0	0	0	0	0
Campaign Course for Independent Expenditure and Major Donor Committees	0	0	0	0	0
Campaign Course for General Purpose and Primarily Formed Committees	0	0	0	1	0
Advertisement Course for Candidates and Candidate-Controlled Committees	5	1	0	7	0

July

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments	Withdrawals
Statement of Economic Interests Course	18	9	0	23	0
Campaign Course for Local Candidates and Candidate-Controlled Committees	8	9	1	10	1
Campaign Course for State Candidates and Candidate-Controlled Committees	0	0	0	0	0
Campaign Course for Independent Expenditure and Major Donor Committees	1	0	0	1	0
Campaign Course for General Purpose and	0	1	0	0	0

Primarily Formed Committees					
Advertisement Course for Candidates and Candidate-Controlled Committees	3	6	0	4	0

E. Advice

The June Advice Letter Report and July Advice Letter Report are available on the FPPC website at https://www.fppc.ca.gov/the-law/advice-letters-and-commission-opinions/advice-letter-reports/.

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

- ***Education***: The Education unit responded to 359 requests for technical assistance via telephone.

- ***Email Requests for Advice:*** Political Reform Consultants and Legal Division attorneys collectively responded to 476 email requests for advice, 375 of which were responded to within 24 hours, and 401 of which were responded to within 48 hours.

- ***Advice Letters:*** The Legal Division received 11 advice letter requests under the Political Reform Act and completed 9.

- ***Section 1090 Letters:*** The Legal Division received 3 advice letter requests concerning Section 1090 and completed 8.

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

- ***Education***: The Education unit responded to 811 requests for technical assistance via telephone.

- ***Email Requests for Advice:*** Political Reform Consultants and Legal Division attorneys collectively responded to 808 email requests for advice, 610 of which were responded to within 24 hours, and 678 of which were responded to within 48 hours.

- ***Advice Letters:*** The Legal Division received 9 advice letter requests under the Political Reform Act and completed 10.

- ***Section 1090 Letters:*** The Legal Division received 3 advice letter requests concerning Section 1090 and completed 5.

F. Miscellaneous Decisions

None.

G. Upcoming Regulation Projects

September

SEI filing requirements for officials holding multiple positions – Amend existing Regulation 18723.1 to clarify statement of economic interest (SEI) filing requirements for officials holding multiple positions, specifically officials who hold a position listed in Section 87200, as well as a position included under Section 87300. (Adoption)

CARS updates – Amend numerous regulations to reflect statutory changes that go into effect when the new Cal-Access filing system "goes live" in late 2026, as well as adopt new regulations and/or amend existing regulations to address items requiring clarification that have arisen during the development of the new filing system. (Pre-notice)

Reporting behested payments as other payments to influence (OPTI) – Amend Regulation 18616 to specify that behested payments disclosable under Section 84224 are required to be reported by a lobbyist employer making the behested payment as an "other payment to influence legislative or administrative action" on quarterly lobbying reports. (Pre-notice)

Cryptocurrency as a reportable financial interest – Amendment existing regulations to conform with Commission-sponsored AB 1029, which revised the Act's statutory definition of "investment" to include "digital financial assets" such as cryptocurrency. (Pre-notice)

October

Economic interest in affiliated non-profit organizations – Adopt a regulation addressing the question at issue in the In re: Winuk Opinion, No. O-25-001of when an economic interest in one non-profit organization results in an interest in an affiliated organization for purposes of the Act's conflict of interest rules. (Pre-notice)

November

CARS updates – Amend numerous regulations to reflect statutory changes that go into effect when the new Cal-Access filing system "goes live" in late 2026, as well as adopt new regulations and/or amend existing regulations to address items requiring clarification that have arisen during the development of the new filing system. (Adoption)

Reporting behested payments as other payments to influence (OPTI) – Amend Regulation 18616 to specify that behested payments disclosable under Section 84224 are required to be reported by a lobbyist employer making the behested payment as an "other payment to influence legislative or administrative action" on quarterly lobbying reports. (Adoption)

Cryptocurrency as a reportable financial interest – Amendment existing regulations to conform with Commission-sponsored AB 1029, which revised the Act's statutory definition of "investment" to include "digital financial assets" such as cryptocurrency. (Adoption)

COLA – Amend various regulations to reflect biennial cost-of-living adjustments required by statute. (Adoption)

For more information on recent and upcoming regulation projects, see https://www.fppc.ca.gov/the-law/fppc-regulations/.

H. Conflict of Interest Codes

State Agencies

- Department of Education
- CA Department of Public Health
- Education Audit Appeals Panel

Multi-County Agencies

- Consolidated Mosquito Abatement District
- West Kern Water District
- Bay Area Water Supply and Conservation Authority
- Julian Charter Schools
- Oakdale Irrigation District
- Delta-Mendota Subbasin GSAs Joint Powers Authority

Extensions

- None

I. Probable Cause Proceedings

Probable cause proceedings are conducted per Government Code section 83115.5. A finding of probable cause exists when a summary of the evidence supports a reasonable belief or strong suspicion that a violation occurred, but does not constitute a finding a violation occurred. Respondents are presumed innocent of any violation of the Act until a violation is proven in a subsequent proceeding.

In the Matter of Kevin Elson, Case No. 2025-00091. On July 9, 2026, probable cause was found, on the papers submitted, that Respondent committed the following violation of the Act:

<u>Count 1: Failure to Timely File an Assuming Office SEI</u>

Elson failed to timely file an Assuming Office SEI by January 12, 2023 due date, in violation of Section 87300.

<u>Count 2: Failure to Timely File a 2023 Annual Office SEI</u>

Elson failed to timely file a 2023 Annual SEI by April 2, 2024 due date, in violation of Section 87300.

Count 3: Failure to Timely File a Combined Annual and Leaving Office SEI
Elson failed to timely file a Combined Annual and Leaving Office SEI by April 6, 2025 due date, in violation of Section 87300.

In the Matter of Leroy Aleman, Case No. 2025-00443. On July 14, 2026, probable cause was found, on the papers submitted, that Respondent committed the following violation of the Act:

Count 1: Failure to File 2023 Annual SEI
Aleman failed to timely file a 2023 Annual SEI by April 2, 2024, in violation of Section 87203.

Count 2: Failure to File a Combined 2024 Annual and Leaving Office SEI
Aleman failed to timely file a Combined 2024 Annual and Leaving Office SEI by March 12, 2025 due date, in violation of Section 87203.

In the Matter of R.A. Drew Esquer, Case No. 2024-00339. On July 15, 2026, probable cause was found, on the papers submitted, that Respondent committed the following violation of the Act:

Count 1: Failure to Timely File 2022 Annual Statement of Economic Interest
Esquer failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, in violation of Government Section 87203.

Count 2: Failure to Timely File 2023 Annual Statement of Economic Interest
Esquer failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, in violation of Government Section 87203.

Count 3: Failure to Timely File 2024 Annual Statement of Economic Interest
Esquer failed to timely file a 2024 Annual SEI by the April 1, 2025 due date, in violation of Government Section 87203.

Count 4: Failure to Timely File 2025 Annual Statement of Economic Interest
Esquer failed to timely file a 2025 Annual SEI by the April 1, 2026 due date, in violation of Government Section 87203.

In the Matter of Jessica Bobadilla, Case No. 2024-00427. On July 20, probable cause was found, on the papers submitted, to believe that Respondent committed the following violations of the Act:

Count 1: Failure to Timely File 2021 Annual SEI
Bobadilla failed to timely file the 2021 Annual SEI by the April 1, 2022 due date, in violation of Government Code Section 87300.

Count 2: Failure to Timely Disclose Reportable Interest on 2021 Annual SEI

Bobadilla failed to timely disclose the name of their law firm, the names of individual sources of income of $10,000 or more for the law firm Bobadilla solely owns, and the names of persons who gave gifts to Bobadilla on their 2021 Annual SEI by the April 1, 2022 due date, in violation of Government Code Section 87300.

Count 3: Failure to Timely File 2022 Annual SEI

Bobadilla failed to timely file the 2022 Annual SEI by the April 3, 2023 due date, in violation of Government Code Section 87300.

Count 4: Failure to Timely Disclose Reportable Interest on 2022 Annual SEI

Bobadilla failed to timely disclose the name of their law firm, the names of individual sources of income of $10,000 or more for the law firm Bobadilla solely owns, and the names of persons who gave gifts to Bobadilla on their 2022 Annual SEI by the April 3, 2023 due date, in violation of Government Code Section 87300.

Count 5: Failure to Timely File 2023 Annual SEI

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

Count 6: Failure to Timely Disclose Reportable Interest on 2023 Annual SEI

Bobadilla failed to timely disclose the names of individual sources of income of $10,000 or more for the law firm Bobadilla solely owns on their 2023 Annual SEI by the April 2, 2024 due date, in violation of Government Code Section 87300.

Count 7: Failure to Timely File 2024 Annual/Leaving Office SEI

Bobadilla failed to timely file the 2024 Annual/Leaving Office SEI by the March 17, 2025 due date, in violation of Government Code Section 87300.

In the Matter of William Nicoletti, Case No. 2025-00093. On July 21, 2026, probable cause was found, on the papers submitted, that Respondent committed the following violation of the Act:

Count 1: Failure to Timely File a 2021 Annual SEI

Nicoletti failed to timely file a 2021 Annual SEI by April 1, 2022 due date, in violation of Section 87300.

Count 2: Failure to Timely File a 2022 Annual SEI

Nicoletti failed to timely file a 2022 Annual SEI by April 3, 2023 due date, in violation of Section 87300.

Count 3: Failure to Timely File a 2023 Annual SEI

Nicoletti failed to timely file a 2023 Annual SEI by April 2, 2024 due date, in violation of Section 87300.

Count 4: Failure to Timely File a 2024 Annual SEI

Nicoletti failed to timely file a 2024 Annual SEI by April 1, 2025 due date, in violation of Section 87300.

In the Matter of Lila Gemellos, Case No. 2023-00706. On August 3, probable cause was found, on the papers submitted, to believe that Respondent committed the following violations of the Act:

<u>Count 5: Failure to Timely File a 2023 Annual SEI</u>
Gemellos failed to timely file their 2023 Annual SEI by the April 2, 2024 due date, in violation of Section 87300.

<u>Count 6: Failure to Timely File a 2024 Annual SEI</u>
Gemellos failed to timely file their 2024 Annual SEI by the April 1, 2025 due date, in violation of Government Code Section 87300.

<u>Count 7: Failure to Timely File a 2025 Annual SEI</u>
Gemellos failed to timely file their 2025 Annual SEI by the April 1, 2026 due date, in violation of Government Code Section 87300.

IV. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: JUE WANG, PhD, CHIEF OF ADMINISTRATION

A. New Employee Report

Enforcement Division
Stephanie Meaglia, Attorney
Kimberly Rawnsley, Associate Governmental Program Analyst (Promotion)

B. Hiring Process

Enforcement Division
Political Reform Consultant, FPPC
Staff Services Analyst, FPPC

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

April 1 Filing Status

As of August 6, 2026, **23,343** 2025 annual statements have been successfully filed through FPPC's E-filing system, representing approximately 98% of the total.

Entity	Total	Filed on Time	Filed Late	Not Filed
Cities A - M	3,837	3,400	345	92
Cities N - Z	2,883	2,546	280	57
Counties	4,511	3,833	559	119
Courts	4	4	0	0
GSA	1,620	1,483	110	27
Keenan	17	17	0	0
Legislative Staffers	1,610	1,489	117	4
Multi-County Agencies	6,204	5,625	486	93
State Agencies	3,094	2,847	202	45
Total	**23,780**	**21,244**	**2,099**	**437**
		89.3%	8.8%	1.9%

SEI Unit June- July 2026 Summary

- Referred 20 cases to the Enforcement
- Issued 51 fine letters and 17 Amendment letters

- Issued 1095 Non-filer letters
- Processed 220 Form 462
- Responded 5,833 emails from form700@fppc.ca.gov and 250 phones calls
- Re-certified 4 existing local e-filing systems and approved 8 new local e-filing system

D. Collection/Revenue

July 2025 – June 2026 Report of Collection

Category	Check	Credit Card	FTB Offset	Total
SEI Filing Fee	$ 45,000	-	-	$ 45,000
SEI Fine	$ 4,844	$ 26,915	$ 5,695	$ 37,454
PREP	$ 400	$ 16,900	-	$ 17,300
Enforcement Collection	$ 900	$ 1,625	$ 10,896	$ 13,421
Enforcement Stipulations	$ 379,420	$ 106,418	-	$ 485,838
Reimbursement	$ 467,786	-	-	$ 467,786
Total	**$ 898,350**	**$ 151,858**	**$ 16,591**	**$ 1,066,799**

July 2026 Report of Collection

Category	Check	Credit Card	FTB Offset	Total
SEI Filing Fee	$ 3,000	-	-	$ 3,000
SEI Fine	-	$ 2,200	-	$ 2,200
PREP	-	$ 1,350	-	$ 1,350
Enforcement Collection	-	$ 12,200	-	$ 12,200
Enforcement Stipulations	-	-	-	-
Reimbursement	$ 25	-	-	$ 25
Total	**$ 3,025**	**$ 15,750**	-	**$ 18,775**