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

EXECUTIVE STAFF REPORTS

December 3, 2026 Commission Hearing

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I. ENFORCEMENT DIVISION

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

A. Overview

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

	Sworn	Non-Sworn	Anonymous	Referrals
Number Received	120	54	297	115

For the month of October, more time to respond beyond the 14-day statutory period was needed for approximately 23 sworn complaints.

Additionally, for the month of September, the Enforcement Division opened 182 cases, rejected 218 complaints and referrals, and closed a total of 92 cases including:

- 36 warning letters – statement of economic interests violations (25), advertisement violations (2), gift-over-limit violations (1), and campaign violations (8);
- 31 no action closure letters: PREP completed –statement of economic interests violations (23), advertisement violations (3), and campaign violations (5);
- 14 no action closure letters alleging – statement of economic interests violations (7), advertisement violations (2), campaign violations (3), and conflict of interests (2);
- 5 approved stipulations from the October Commission Meeting;
- 6 administrative terminations;

The Division had a total of 1,059 cases in various stages of resolution at the time of the October Monthly Report and currently has approximately 1,149 cases in various stages of resolution, including the 14 streamline cases, 7 mainline cases, 1 default, and 2 pre-notice defaults before the Commission as listed in the December Agenda. Net case openings since the last monthly report totaled 90.

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. 2025-2026 Quarterly Caseload Summary

The following is a chart that compares the number of cases from given years at the end of each quarter during 2025 and 2026 Enforcement has successfully focused on the resolution of older cases.

[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.

	September 2025	December 2025	March 2026	June 2026	September 2026	Difference in Existing Caseload Overall
2018	1	1	1	1	1	**-0**
2019	8	6	5	4	4	**-4**
2020	11	9	5	3	1	**-10**
2021	33	30	25	17	13	**-20**
2022	91	83	79	67	63	**-28**
2023	148	133	120	113	102	**-46**
2024	270	251	242	220	216	**-54**
2025	--	--	301	265	252	**-49**

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.

Advertisements

In the Matter of Gates for Attorney General 2026 and Michael Gates; FPPC No. 26/1033. Staff: Jaleena Evans, Commission Counsel. Michael Gates was an unsuccessful candidate for California Attorney General in the November 3, 2026 General Election. Gates for Attorney General 2026 is Gates' candidate-controlled committee. The Committee failed to include the required artificial intelligence disclosure on an advertisement posted to the Committee's X account, in violation of Government Code Section 84514 (1 count). **Total Penalty: $200 (Tier One).**

Campaign Late Filer/Reporter

In the Matter of Cole Brocato for California State Assembly 2022, Cole Brocato, and Steve Floersheim; FPPC No. 23/265. Staff: Chance Felkins, Commission Counsel. Cole Brocato for California State Assembly 2022 is Cole Brocato's candidate-controlled committee. Steve Floersheim is the Committee's treasurer. Cole Brocoto was successful in the June 7, 2022 Primary Election and was unsuccessful in the November 8, 2022 General Election. The Committee and Floersheim failed to timely file four pre-election statements, in violation of Government Code Section 84200.5 (4 counts), failed to timely file two semiannual statements, in

violation of Government Code Section 84200 (2 counts), and failed to timely file five 24-Hour Reports, in violation of Government Code Section 84203 (5 counts). **Total Penalty $2,647 (Tier One).**

In the Matter of Friends of Joseph R. Passalacqua for Judge 2022, Joseph Passalacqua, and Kaylene Hirtzer; FPPC 24/820. Staff: Franceska Gonzalez, Commission Counsel. Friends of Joseph R. Passalacqua for Judge 2022 was Passalacqua's candidate-controlled committee. Kaylene Hirtzer served as the Committee's treasurer. Joseph R. Passalacqua was an unsuccessful candidate for Judge of the Superior Court of Sonoma County in the June 7, 2022 Primary Election. The Committee and Hirtzer failed to timely file two semiannual statements, in violation of Government Code Section 84200 (2 counts), and failed to timely file an amendment to the Statement of Organization, in violation of Government Code Section 84103 (1 count). **Total Penalty: $2,605 (Tier Two).**

In the Matter of Bill Pai for Alameda City Council 2022, Bill Pai, and Joyce Boyd; FPPC No. 22/792. Staff: Kristin E. Goulet, Commission Counsel. Bill Pai for Alameda City Council 2022 was Pai's candidate-controlled committee. Joyce Bord served as the committee's treasurer. Bill Pai was an unsuccessful candidate for City Council Member of the City of Alameda in the November 8, 2022 General Election. The respondents failed to timely file two pre-election statements, in violation of Government Code Section 84200.5 (2 counts), failed to timely file a semiannual statement, in violation of Government Code Section 84200 (1 count), and failed to keep records, in violation of Government Code Section 84104 (1 count). **Total Penalty: $2,245 (Tiers One and Two).**

In the Matter of Liz Lawler for California Assembly 2022, Liz Lawler, and Nicholas Sanders; FPPC No. 25/140. Staff: Jonathan Rivera, Commission Counsel. This matter arose from an audit performed by the Franchise Tax Board's Political Reform Audit Program. Liz Lalwer was an unsuccessful candidate for Assembly District 28 in the November 8, 2022 General Election. Liz Lawler for California Assembly 2022 was Lawler's candidate-controlled committee. Nicholas Sanders served as the committee's treasurer. The Committee, Lawler, and Sanders failed to timely file two 10-Day Reports, in violation of Government Section 85309(c) (2 counts). **Total Penalty: $1,150 (Tier One).**

In the Matter of Simon Pang; FPPC No. 2026-00248. Staff: Jack Blattner, Commission Counsel. Simon Pang qualified as a major donor committee in 2021 and 2022. Pang failed to timely file three semiannual statements, in violation of Government Code Section 84200, subdivision (b) (3 counts) and failed to timely file two 24-Hour Reports, in violation of Government Code Section 84203 (2 counts). **Total Penalty: $1,000 (Tier One).**

In the Matter of Committee to Elect Tommy Hayes for Sheriff 2022, Thomas Hayes, and Rosario Ruiz-Dark; FPPC No. 23/156. Staff: Jaleena Evans, Commission Counsel. Thomas Hayes was an unsuccessful candidate for Yolo County Sheriff in the June 7, 2022 Primary Election. Committee to Elect Tommy Hayes for Sheriff 2022 was Hayes' candidate-controlled committee, and Rosario Ruiz-Dark served as the Committee's treasurer. The Committee and Ruiz-Dark failed to timely report accrued expenses on a pre-election statement, in violation of Government Code Section 84211 (1 count). **Total Penalty: $811 (Tier Two).**

Statement of Economic Interests Late Filer/Reporter

In the Matter of Debbie Moser; FPPC No. 24/946. Staff: Kristin E. Goulet, Commission Counsel. Debbie Moser, a Board Member of Weed Union Elementary School District, failed to timely file the 2022 and 2023 Annual Statements of Economic Interests, in violation of Government Code Section 87300 (2 counts). **Total Penalty: $600 (Tier One).**

In the Matter of James Vanderpool; FPPC No. 26/078. Staff: Alex Rose, Senior Commission Counsel and Kristin Hamilton, Special Investigator. James Vanderpool, as City Manager of the City of Anaheim, failed to timely report gifts on his 2020 Annual Statement of Economic Interests, in violation of Government Code Section 87207 (1 count). **Total Penalty: $600 (Tier Two).**

In the Matter of Michael Pettibone; FPPC No. 24/1136. Staff: Kristin E. Goulet, Commission Counsel. Michael Pettibone, a Board Member of the Diamond Springs – El Dorado Fire Protection District, failed to timely file the 2023 and 2024 Annual Statements of Economic Interests, in violation of Government Code Section 87300 (2 counts). **Total Penalty: $600 (Tier One).**

In the Matter of David Mettler; FPPC No. 26/590. Staff Theresa Gilbertson, Attorney Supervisor and Joselyne Soto, Legal Analyst. David Mettler failed to timely file 2024 and 2025 Annual Statements of Economic Interests in violation of Government Code Section 87300 (2 counts). **Total Penalty: $400 (Tier One).**

In the Matter of Michael Ghiringhelli; FPPC No. 25/1229. Staff: Jonathan Rivera, Commission Counsel. The Respondent is represented by William O'Connell of O'Connell Law Offices. Michael Ghiringhelli, as city councilmember for the Town of Fairfax, failed to timely file their Assuming Office Statement of Economic Interests and 2025 Annual Statement of Economic Interests, in violation of Government Code Sections 87202 and 87203 (2 counts). **Total Penalty: $400 (Tier One).**

In the Matter of Bradley Ish; FPPC No. 26/897. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Bradley Ish, a Governing Board Member for the Bogus Elementary School District, failed to timely file a 2025 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Penalty: $200 (Tier One).**

In the Matter of Jessma Evans; FPPC No. 26/865. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Jessma Evans, a Governing Board Member for the Mount Shasta Union Elementary School District, failed to timely file a 2025 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (1 count). **Total Penalty: $200 (Tier One).**

II. AUDITS & ASSISTANCE DIVISION

STAFF: SHRDHA SHAH, CHIEF OF AUDITS & ASSISTANCE

Audits are conducted per Government Code sections 90000 - 90008 of the Political Reform Act (the Act). The Act requires full disclosure of receipts and expenditures of candidates and committees and disclosure of the finances of lobbyists. The purpose of the audits is to determine the level of compliance of the auditees with the Act. The opinions expressed in the audit report reflect the level of compliance with the Act. The FPPC is not responsible for the contents of the candidate's documents. Audit reports are then submitted to the Enforcement Division for further review.

A. Overview

The audit reports prepared by the FPPC summarize findings with respect to the filer's conformity with the disclosure and recordkeeping requirements of the Political Reform Act. Copies of audit reports are always sent to the auditees and those included in the audit report (such as the prior treasurer, current treasurer, and/or their representatives). These reports are public documents.

B. Current Period Updates

During the period October 1, 2026, to October 31, 2026, the Audits and Assistance Division adopted one audit report with no findings. Currently, the team has 37 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.

Details of the audit report adopted are as follows:

1. **Dario Frommer for Controller 2022 (ID# 1407612)**
    - 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 $20,000 administrative penalty. 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

- October 7, the FPPC presented a Candidate/Treasurer webinar. Political Reform Consultants Alexandra Miner and Kathryn Ito, presented. 9 people attended.
- October 13, the FPPC presented a Campaign Filing Officer webinar. Political Reform Consultants Christian Durham and Kathryn Ito, presented. 25 people attended.
- October 14, the FPPC presented a Completing Campaign Forms 460/497 webinar. Political Reform Consultants Kathryn Ito and Christian Durham, presented. 21 people attended.
- October 27, the FPPC presented a Major Donor and Independent Expenditure Committees webinar. Political Reform Consultants Kathryn Ito and Stephen Hernandez, presented. 15 people attended.

Scheduled Webinars & Workshops

- December 2 – Candidate/Treasurer After the Election
- December 9 – Conflicts of Interest and Gov. Code Section 1090
- December 10 – Form 700 Filing Officers
- December 14 – Form 700 Filers

Video Tutorials

Commission video tutorials were accessed a total of 386 times in October. Form 700 videos were accessed 173 times, the Candidate/Treasurer video was accessed 105 times, the filing officer videos were accessed 30 times, the Behested Payments (Form 803) video was accessed 16 times, and the How to File a Form 410 – For Local Candidate-Controlled Committees was accessed 62 times.

C. New and Updated Educational Resources

None.

D. Political Reform Education Program (PREP):

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments	Withdrawals
Statement of Economic Interests Course	15	18	6	29	0
Campaign Course for Local Candidates and Candidate-Controlled Committees	0	2	0	4	0
Campaign Course for State Candidates and Candidate-Controlled Committees	1	0	0	3	0
Campaign Course for Independent Expenditure and Major Donor Committees	1	0	0	1	0
Campaign Course for General Purpose and Primarily Formed Committees	3	1	0	3	0
Advertisement Course for Candidates and Candidate-Controlled Committees	1	2	0	1	0

E. Advice

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

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

- ***Education***: The Education unit responded to 615 requests for technical assistance via telephone.

- ***Email Requests for Advice:*** Political Reform Consultants and Legal Division attorneys collectively responded to 720 email requests for advice, 451 of which were responded to within 24 hours, and 522 of which were responded to within 48 hours.

- ***Advice Letters:*** The Legal Division received 8 advice letter requests under the Political Reform Act and completed 11.

- ***Section 1090 Letters:*** The Legal Division received 9 advice letter requests concerning Section 1090 and completed 10.

F. Miscellaneous Decisions

None.

G. Upcoming Regulation Projects

January
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)

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 Health Care Access and Information
- State Board of Food and Agriculture

Multi-County Agencies
- Dublin San Ramon Services District
- Marin Schools Insurance Authority
- Vector Control Joint Powers Authority
- Connecting Waters Charter Schools

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 Edwin Sabathia, Case No. 2026-00307. On October 6, 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 an Assuming Office SEI
Sabathia failed to timely file an Assuming Office Statement of Economic Interests ("SEI"), in connection with the position of City Council Member for the City of San Juan Bautista by the January 19, 2023 due date, in violation of Section 87202.

Count 2: Failure to Timely File a 2023 Annual SEI
Sabathia failed to timely file a 2023 Annual SEI in connection with the position of City Council Member for the City of San Juan Bautista by the April 2, 2024 due date, in violation of Government Code Section 87203.

Count 3: Failure to Timely File a 2024 Annual SEI
Sabathia failed to timely file a 2024 Annual SEI in connection with the position of City Council Member for the City of San Juan Bautista by the April 1, 2025 due date, in violation of Government Code Section 87203.

Count 4: Failure to Timely File an Assuming Office SEI
Sabathia failed to timely file an Assuming Office SEI in connection with the position of Alternate Member of the Board of Directors for the Association of Monterey Bay Area Governments by the February 6, 2025 due date, in violation of Government Code Section 87202.

Count 5: Failure to Timely File a 2025 Annual SEI
Sabathia failed to timely file a 2025 Annual SEI in connection with the position of City Council Member for the City of San Juan Bautista by the April 1, 2026 due date, in violation of Government Code Section 87203.

Count 6: Failure to Timely File a 2025 Annual SEI
Sabathia failed to timely file a 2025 Annual SEI in connection with the position of Alternate Member of the Board of Directors for the Association of Monterey Bay Area Governments by the April 1, 2026 due date, in violation of Government Code Section 87203.

In the Matter of Ramzi Murad, Case No. 2025-01070. On October 27, 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 Assuming Office Statement of Economic Interests
Ramzi Murad failed to timely file the Assuming Office Statement of Economic Interests by the December 22, 2021 due date, in violation of Government Code Section 87300.

Count 2: Failure to Timely File 2022 Annual Statement of Economic Interests
Ramzi Murad failed to timely file the 2022 Annual Statement of Economic Interests by the April 3, 2023 due date, in violation of Government Code Section 87300.

Count 3: Failure to Timely File 2023 Annual Statement of Economic Interests
Ramzi Murad failed to timely file the 2023 Annual Statement of Economic Interests by the April 2, 2024 due date, in violation of Government Code Section 87300.

Count 4: Failure to Timely File 2024 Annual Statement of Economic Interests
Ramzi Murad failed to timely file the 2024 Annual Statement of Economic Interests by the April 1, 2025 due date, in violation of Government Code Section 87300.

Count 5: Failure to Timely File 2025 Annual Statement of Economic Interests
Ramzi Murad failed to timely file the 2025 Annual Statement of Economic Interests by the April 1, 2026 due date, in violation of Government Code Section 87300.

Count 6: Failure to Timely File Leaving Office Statement of Economic Interests
Ramzi Murad failed to timely file the Leaving Office Statement of Economic Interests by the March 20, 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
Ryan Zalesny, Attorney III, FPPC
Carlie Haug, Political Reform Consultant I, FPPC (Promotion)

B. Hiring Process

No vacancies.

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

April 1 Filing Status

As of November 1, 2026, **23,542** 2025 annual statements have been successfully filed through FPPC's E-filing system, representing approximately 98.2% of the total.

Entity	Total	Filed on Time	Filed Late	Not Filed
Cities A - M	3,834	3,399	375	60
Cities N - Z	2,886	2,546	293	47
Counties	4,625	3,828	637	160
Courts	4	4	0	0
Groundwater Sustainability Agency	1,620	1,483	113	24
Keenan	17	17	0	0
Legislative Staffers	1,608	1,489	119	0
Multi-County Agencies	6,286	5,635	543	108
State Agencies	3,094	2,847	214	33
Total	**23,974**	**21,248**	**2,294**	**432**
		88.6%	9.6%	1.8%

2026 Year-To-Date E-Filing Summary

As of November 1, 2026, 34,678 Annual, Assuming Office, Leaving Office, and Candidate Statements filed using the FPPC's E-filing system in 2026.

Entity	Annual	Assuming	Leaving	Candidate	Total
Cities A - M	3,798	379	330	1,375	5,882
Cities N - Z	2,871	332	276	953	4,432
Constitutional officers	52	7	5	140	204
Counties	4,475	429	252	242	5,398
Courts	2,292	122	101	143	2,658
Groundwater Sustainability Agency	1,625	117	100	2	1,844
Keenan	17	1	1	0	19
Legislative Staffers	1,609	241	197	0	2,047
Legislature	120	0	2	213	335
Multi-County Agencies	6,226	939	857	29	8,051
State Agencies	3,111	368	329	0	3,808
Total	**26,196**	**2,935**	**2,450**	**3,097**	**34,678**

SEI Unit October 2026 Summary

- Referred 22 cases to the Enforcement Division and 12 cases to PREP
- Issued 82 Fine letters and 27 Amendment letters
- Issued 416 Non-filer letters
- Processed 1,241 Form 462 (Verification of Independent Expenditures)
- Responded to 2,165 emails from form700@fppc.ca.gov and 64 phone calls
- Re-certified 14 existing local e-filing systems and approved 2 new local e-filing systems

D. Collection/Revenue

July 2026 – October 2026 Report of Collection

Category	Check	Credit Card	FTB Offset	Total
SEI Filing Fee	$ 6,000	-	-	$ 6,000
SEI Fine	$ 800	$ 11,176	$ 200	$ 12,176
PREP	$ 100	$ 6,200	-	$ 6,300
Enforcement Collection	-	-	$ 182	$ 182
Enforcement Stipulations	$ 122,368	$ 36,883	-	$ 159,251
Reimbursement	$ 25	-	-	$ 25
Total	**$ 129,293**	**$ 54,259**	**$ 382**	**$ 183,934**