



EXECUTIVE STAFF REPORTS

March 19, 2026 Commission Hearing

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I. ENFORCEMENT DIVISION

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

A. Overview

During the period of January 1, 2026, through February 28, 2026, the Enforcement Division received the following complaints and referrals:

	Sworn	Non-Sworn	Anonymous	Referrals
Number Received	99	12	67	210

The combined number of complaints received by the Enforcement Division during January and February 2026 increased compared to the combined number of complaints received during November and December 2025. The combined number of referrals received by the Enforcement Division during January and February 2026 decreased slightly compared to those received during the months of November and December 2025.

For the months of January and February, more time to respond beyond the 14-day statutory period was needed for approximately 40 sworn complaints. Generally, additional time to respond was utilized in order to give respondents more time to respond to inquiries when it was requested.

Additionally, for the months of January and February, the Enforcement Division opened 182 cases, rejected 143 complaints and referrals, and closed a total of 89 cases including:

- 36 warning letters –lobbying reporting violations (15), statement of economic interests violations (16) and campaign violations (5)
- 29 no action closure letters: PREP completed –statement of economic interests violations (23) and campaign violations (6);
- 9 no action closure letters alleging – advertisement violations (2), campaign violations (2), and statement of economic interests violations (5);
- 2 advisory letters;
- 9 approved stipulations from the January Commission Meeting;
- 2 administrative terminations;
- 2 closed as a duplicate.

The Division had a total of 856 cases in various stages of resolution at the time of the January Monthly Report and currently has approximately 949 cases in various stages of resolution, including the 21 streamline, 6 mainline, and 4 default cases before the Commission as listed in the March Agenda. Net case openings since the last monthly report totaled 93.

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

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.

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.

	December 2024	March 2025	June 2025	September 2025	December 2025	Difference in Existing Caseload Overall
2018	5	3	1	1	1	-4
2019	12	11	8	8	6	-6
2020	40	24	14	11	9	-31
2021	68	54	42	33	30	-38
2022	131	119	104	91	83	-48
2023	194	171	154	148	133	-61
2024	--	318	295	270	251	-67

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.

Recordkeeping

[In the Matter of San Diegans Against Hate PAC, Jared Sclar, and Nancy Haley; FPPC No. 23/369.](#) Staff: Laura Columbel, Commission Counsel and Kaitlin Osborn, Special Investigator. The respondents are represented by the Sutton Law Firm. San Diegans Against Hate PAC is a local general purpose committee. Nancy Haley served as treasurer and Jared Sclar served as principal officer. The Committee failed to maintain records, in violation of Government Code Section 84104 (1 count); and failed to include proper advertisement disclosures on ten mailers, in violation of Government code Sections 84504.2 and 84506.5 (10 counts). **Total Penalty: \$2,831 (Tier one and Tier two).**

Campaign Late Filer/Reporter

[In the Matter of Eric Arias & Eric Arias for Bakersfield City Council 2020/2022; FPPC No. 23/853.](#) Staff: Laura Columbel, Commission Counsel and Katelin Angeloni, Special Investigator.

Eric Arias was a successful candidate in the November 3, 2020 and November 8, 2022, General Elections. Eric Arias for Bakersfield City Council 2020/2022 was the candidate-controlled committee. Arias failed to timely file a statement of intention, an amended statement of organization, two pre-election campaign statements, and nine semi-annual campaign statements, in violation of Government Code Sections 84103, 84200, 84200.5, and 85200 (13 counts). **Total Proposed Penalty: \$3,201 (Tier One & Tier Two).**

[In the Matter of Bilal Mahmood for Assembly 2022, Bilal Mahmood; FPPC No. 25/192.](#)

Staff: Jonathan Rivera, Commission Counsel. This matter arose from an audit performed by the Franchise Tax Board's Political Reform Audit Program. The candidate was an unsuccessful candidate for Assembly in the February 15, 2022 Special Primary Election. Bilal Mahmood for Assembly 2022 was the candidate's candidate-controlled committee. The Committee failed to timely file a 10-Day Contribution Report, in violation of Government Code Section 85309(c) (1 count). **Total Penalty: \$675 (Tier One).**

[In the Matter of Ojai Valley Democratic Club, Victoria Clarke, and Jeffrey Starkweather; FPPC No. 21/096.](#)

Staff: Jonathan Rivera, Commission Counsel. Ojai Valley Democratic Club is a local general purpose committee. Victoria Clarke served as the treasurer. Jeffrey Starkweather served as the principal officer. The Committee failed to timely file one semiannual campaign statement, in violation of Government Code Section 84200 (1 count), and one pre-election campaign statement, in violation of Government Code Sections 84200.5 and 84200.8 (1 count). **Total Penalty: \$645 (Tier One).**

[In the Matter of Bakersfield Police Officers Association PAC and Alex Patino; FPPC No. 25/1005.](#)

Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Tara Stock, Intake Manager. Bakersfield Police Officers Association PAC is a local general purpose committee. Alex Patino is the Committee's treasurer. The Committee and Patino failed to timely file a semi-annual campaign statement, in violation of Government Code Section 84200 (1 count). **Total Penalty: \$260 (Tier One).**

[In the Matter of Janet Long for JUSD Trustee Area 5, Janet Long, Susan Leivas-Sturner; FPPC No. 22/794.](#)

Staff: Jonathan Rivera, Commission Counsel. Janet Long was an unsuccessful candidate for the Jurupa Unified School District in the November 8, 2022 General Election. Janet Long for JUSD 2022 was the candidate's candidate-controlled committee. Susan Leivas-Sturner served as the Committee's treasurer. The Committee failed to timely file two 24-Hour Reports, in violation of Government Code Section 84203 (2 counts), and failed to properly disclose a loan in violation of Government Code Section 84211 (1 count). **Total Penalty: \$220 (Tier One).**

Statement of Economic Interests Late Filer/Reporter

[In the Matter of Marshall Miller; FPPC No. 22/681.](#) Staff: Theresa Gilbertson, Attorney Supervisor and Joselyne Soto, Associate Governmental Program Analyst. Marshall Miller, as Planning Commissioner for the City of Montecito failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87202 (1 count). Additionally, Miller failed to timely file an Annual Statement of Economic Interests for 2021,

2022, and 2023, in violation of Government Code Section 87203 (3 counts). **Total Penalty: \$800.**

[In the Matter of Cedric Rutland; FPPC No. 25/1243.](#) Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Cedric Rutland, a Board Member for the California Health Workforce Education and Training Council with the Department of Health Care Access and Information, failed to timely file an Assuming Office, 2022 Annual, and 2023 Annual Statement of Economic Interests, in violation of Government Code Section 87300 (3 counts). **Total Penalty: \$600 (Tier One).**

[In the Matter of Arlington La Mica; FPPC No. 25/1125.](#) Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Arlington La Mica, a Planning Commissioner for the City of Seaside, failed to timely file a 2023 Annual and 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (2 counts). **Total Penalty: \$400 (Tier One).**

[In the Matter of Benjamin Helber; FPPC No. 26/028.](#) Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Benjamin Helber, a Planning Commissioner for the City of Moraga, failed to timely file a 2023 Annual and 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (2 counts). **Total Penalty: \$400 (Tier One).**

[In the Matter of Blane Adams; FPPC No. 26/040.](#) Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Blane Adams, a Member of the Board of Directors for the Northern California Regional Liability Excess Fund Joint Powers Authority, failed to timely file a 2023 Annual and 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (2 counts). **Total Penalty: \$400 (Tier One).**

[In the Matter of Cole Estill; FPPC No. 26/026.](#) Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Cole Estill, an Alternate Member of the Commission for the Sheep Commission, 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 Donelle Dadigan; FPPC No. 25/1220.](#) Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Donelle Dadigan, a Member of the Board of the Endowment for the Cultural and Historical Endowment, 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 Juan Mondragon; FPPC No. 26/090.](#) Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Juan Mondragon, a Planning Commissioner for the City of Ridgecrest, failed to timely file a 2024 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 count). **Total Penalty: \$200 (Tier One).**

[In the Matter of Kaden Bedard; FPPC No. 25/944.](#) Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Kaden Bedard, a Member for the Santa Barbara County Juvenile Justice Coordinating Council, 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 Kevin Thompson; FPPC No. 26/007.](#) Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Kevin Thompson, an Alternate Member/Director of the Board of Directors for the California Intergovernmental Risk Authority, failed to timely file an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87202 (1 count). **Total Penalty: \$200 (Tier One).**

[In the Matter of Kyle Niehues; FPPC No. 26/124.](#) Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Kyle Niehues, an Alternate Member of the Commission for the Rice Commission, 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).**

[In the Matter of Nicole Hokanson; FPPC No. 25/1226.](#) Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Nicole Hokanson, a Director for the Happy Camp Community Services District, failed to timely file a Leaving Office and an Assuming Office Statement of Economic Interests, in violation of Government Code Section 87300 (2 counts). **Total Penalty: \$200 (Tier One).**

[In the Matter of Sara Tavakoli; FPPC No. 25/1124.](#) Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Sara Tavakoli, a Staff Services Manager I for the California Department of Corrections and Rehabilitation, 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 Charlotte's Web Inc; FPPC No. 26/087.](#) Staff Chance Felkins, Commission Counsel. Charlotte's Web Inc. is a lobbyist employer and was registered for the 2019-2020 legislative session. Charlotte's Web Inc failed to timely file one lobbyist employer report, in violation of Government Code Section 86117 (1 count). **Total Penalty: \$425 (Tier One).**

[In the Matter of Transportation Workers Union; FPPC No. 26/088.](#) Staff Chance Felkins, Commission Counsel. The respondent is represented by Denis A. Engel of Colleran, O'Hara & Mills LLP. Transportation Workers Union is a lobbyist employer and was registered for the 2019-2020 legislative session. Transportation Workers Union failed to timely file one lobbyist employer report, in violation of Government Code Section 86117 (1 count). **Total Penalty: \$320 (Tier One).**

In the Matter of Creative Artists Agency LLC and Tammy Brandt; FPPC No. 26/096. Staff Chance Felkins, Commission Counsel. Creative Artists Agency LLC is a lobbyist employer and was registered for the 2025-2026 legislative session. Tammy Brandt is the organization's Chief Compliance Officer and Responsible Officer. Creative Artists Agency failed to timely file one lobbyist employer report, in violation of Government Code section 86117 (1 count). **Total Penalty: \$300 (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 January 1, 2026, to February 28, 2026, the Audits and Assistance Division adopted six audit reports, five with findings and one with no findings. Currently, the team has 44 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.

Details of the audit report adopted are as follows:

1. Ron Galperin for State Controller 2022 (ID# 1427661)

- **Finding 1: Form 460 Semi-annual Statement Not Filed with the Secretary of State**

Forms 460 Semi-Annual Statements for the periods ending December 31, 2020, June 30, 2021, and December 31, 2021, were not filed with the Secretary of State. The receipts and expenditures for each period ending were as follows:

Period Ending December 31, 2020: total receipts amounted to \$1,999, while total expenditures incurred were \$13,624. Of the \$13,624 amount, \$8,550 was invoiced by NGP Van, a company that provides campaign management services, including maintaining contributor databases, generating compliance reports, and tracking outreach activities.

Period Ending June 30, 2021: Receipts totaled \$0, and expenditures incurred totaled \$1,484.

Period Ending December 31, 2021: Receipts totaled \$0, and expenditures incurred totaled \$938.

- **Finding 2: Form 497 Contribution Reports Not Filed for Contributions Received**

Eleven Form 497 Contribution Reports due within 10 business days were not filed with the Secretary of State for contributions received totaling \$69,000. Eighteen other Form 497 Contribution Reports for contributions received totaling \$135,300 were timely filed.

- **Finding 3: Contributions Received Exceeded the Contribution Limit**

Contributions received from 4 contributors exceeded the contribution limit by \$11,500. The excess funds above the contribution limit were not refunded to the contributors.

- **Finding 4: Notifications Not Sent or Sent Untimely to Contributors**

Notifications were not sent to 9 major contributors for contributions received totaling \$64,950. There were 43 total major donor notifications required to be sent. Furthermore, notifications were not sent timely for contributions totaling \$129,100, received from 22 major contributors. The notifications were sent between 1 and 130 days late.

- **Finding 5: Accrued Expenses Not Reported When Incurred**

Accrued expenses totaling \$119,276 were not reported when incurred for the periods ending December 31, 2020, June 30, 2021, December 31, 2021, April 23, 2022, and May 21, 2022. Of this amount, \$84,962 was disclosed on the Form 460 Semi-Annual Statement for the period ending June 30, 2022, which was filed after the June 7, 2022 Primary Election. An additional \$39,850 in accrued expenses incurred during the periods ending April 23, 2022, and June 30, 2022, were not disclosed until the Semi-Annual Statement for the period ending December 31, 2022, also filed after the Primary Election.

2. Gil Botello for City Council 2022 (ID# 1445441)

- **Finding 1: Subvendor information was not disclosed timely for multiple subvendors**

Subvendor information for payments totaling \$3,582 to Minuteman Press, Hareline Graphics, Political Data Inc., and the United States Postal Service (USPS) was not reported on the Form 460 Preelection Statement filed for the period ending May 21, 2022. The subvendors, who provided printing and delivery services for advertising, were disclosed on Form 460 semi-annual Statement filed for the period ending December 31, 2022. In addition, of this amount, the subvendor information for \$880 of the payments was erroneously disclosed as printing expenses for Minuteman Printing, instead of postage expenses for USPS.

Subvendor information for payments totaling \$4,101 to Minuteman Press, Hareline Graphics, Political Data Inc., and the United States Postal Service (USPS) was not reported on the Form 460 Preelection Statement filed for the period ending June 30, 2022. The subvendors, who provided printing and delivery services for advertising, were disclosed on the Form 460 Termination Statement filed for the period ending December 26, 2023.

- **Finding 2: Accrued expenses were not disclosed**

An accrued expense totaling \$100 was not disclosed on the Form 460 Preelection Statement filed for the period ending May 21, 2025. The expense was reported when paid on the Form 460

Semi-annual Statement filed for the period ending June 30, 2022. Accrued expenses totaling \$3,582 were not disclosed on the Form 460 Preelection Statement filed for the period ending May 21, 2022. The expenses were reported when paid on the Form 460 Semi-annual Statement filed for the period ending December 31, 2022. Accrued expenses totaling \$4,101 were not disclosed on the Form 460 Semi-annual Statements filed for the period May 22 through June 30, 2022. The expenses were reported when paid on the Form 460 Termination Statement filed for the period ending December 26, 2023.

3. Michela Alioto-Pier for Board of Equalization 2022 (ID# 1444394)

- **Finding 1: Copies of notifications sent to major contributors were not maintained.**

Copies of when notifications were sent to 8 major contributors were not maintained for contributions received totaling \$147,400. A copy of one notification was maintained for a contribution totaling \$5,000.

- **Finding 2: A Form 410 Statement of Organization was not amended.**

The Form 410 Statement of Organization was not amended to report the Committee qualified on February 2, 2022. The initial Form 410 was filed on February 7, 2022, and was marked as not yet qualified as a committee.

- **Finding 3: Form 497 Contribution Reports were not filed.**

Form 497 Contribution Reports were not filed with the Secretary of State for a \$8,100 contribution received on March 7, 2022, and for a \$5,000 contribution received on June 9, 2022. Reports were timely filed for four contributions received outside the 90-day election cycle totaling \$121,200.

- **Finding 4: Monetary contributions were not disclosed timely.**

Monetary contributions received through ActBlue totaling \$5,800, from 16 contributions, were not disclosed on the Form 460 Preelection Statement for the period ending April 23, 2022. Instead, they were disclosed on the Form 460 Preelection Statement for the period ending May 21, 2022, when the Committee received the contribution checks from ActBlue.

Monetary contributions received through ActBlue totaling \$23,000, from 31 contributions, were not disclosed on the Form 460 Preelection Statement for the period ending May 21, 2022. Instead, they were disclosed on the Form 460 Preelection Statement for the period ending June 30, 2022, when the Committee received the contribution checks from ActBlue.

- **Finding 5: Monetary contributions received through ActBlue were not reported on the date received by the intermediary.**

Monetary contributions totaling \$57,139 for 85 contributions received through ActBlue were reported received on the date the Committee received checks from ActBlue rather than the date ActBlue received the contributions.

- **Finding 6: A contribution transfer was made with Surplus Funds.**

A prohibited contribution for \$46,352 was made with surplus funds to the Michela Alioto-Pier for Democratic County Central Committee on December 20, 2023.

- **Finding 7: A loan received exceeded the contribution limit.**

The Form 460 Preelection Statement filed for the period ending April 23, 2022 reports a loan received of \$100,000 from Thomas Pier, the candidate's spouse, on February 2, 2022. This loan, as reported, is in excess of the \$8,100 contribution limit for Board of Equalization contributions from individuals in effect from January 1, 2021 to December 31, 2022. Source documents reviewed support that the loan was made from an equity line of credit in the names of both Thomas Pier and Michela Alioto-Pier, but the check used to make the loan was only signed by Thomas Pier.

- **Finding 8: Subvendor expense not disclosed.**

Subvendor information for a payment totaling \$25,500 to Complete Digital LLC was not reported. Complete Digital LLC provided digital advertisement services.

4. Peterson for Board of Equalization 2022 (ID# 1439856)

- **No findings noted.**

5. Elliott for Council 2022 (ID# 1443999)

- **Finding: Cash Payments over \$100 for Expenditures**

Cash of \$200 was withdrawn from the campaign bank account on June 1, 2022 and cash of \$600 was withdrawn from the campaign bank account on June 22, 2022 and used for 2 campaign expenses of \$100 or more totaling \$800.

6. Committee to Elect David Dodson as Member, Board of Equalization Fourth District 2022 (ID# 1439166)

- **Finding 1: Records Not Maintained for Expenditures**

Receipts and/or invoices were not maintained for expenditures made totaling \$15,016. Canceled checks, bank statements, and a check register were maintained to verify the names of the payees and the amount paid.

- **Finding 2: Improper Agent Payment**

The Committee improperly reimbursed the candidate \$2,664 in expenses from the campaign bank account. There was no written contract between the candidate and the Committee which provides for the reimbursement of such expenditures and the Treasurer of the Committee was not provided with a dated receipt and a written description of each expenditure prior to reimbursement. Further, the reimbursement is required to be paid within 45 calendar days after

the expenditures are paid by the person to be reimbursed. Thus, the expenses did not qualify to be reported as expenditures, should have been reported as a nonmonetary contribution and the candidate should not have received the reimbursement.

- **Finding 3: Unallowable Payment to Spouse**

The Committee paid \$6,000 from campaign funds to their spouse, who also served as the Committee's treasurer. A spouse or domestic partner of an elected officer or a candidate for elective office shall not receive in exchange for services rendered compensation from campaign funds held by a controlled committee of the elected officer or candidate for elective office.

- **Finding 4: Late Filing of Form 410 – Statement of Organization**

An amendment to the Form 410 Statement of Organization was not filed with the Secretary of State within 10 days of qualifying as a committee. The Form 410 Statement of Organization, due on December 31, 2022, was not filed until March 1, 2022.

- **Finding 5: Form 460 Campaign Disclosure Statement Not Filed**

A Form 460 Semi-annual Statement was not filed with the Secretary of State (SOS). The activity for this semi-annual period was included on the subsequent Form 460 Preelection Statement filed.

- **Finding 6: Expenditures Not Disclosed**

Four expenditures totaling \$2,314 were not disclosed on the Form 460 Campaign Disclosure Statements filed. These campaign expenditures were not processed through the Committee's designated campaign bank account.

- **Finding 7: Expenditures Not Reported Timely**

Expenditures totaling \$10,511 made during the period September 25 through October 22, 2022 were understated by \$3,450 on the initial Form 460 Preelection Statement filed with the Secretary of State. An amendment was filed on January 31, 2022, after the General election, to disclose the total payments made for the statement ending on October 22, 2022.

- **Finding 8: Accrued Expenses Not Reported When Incurred**

Accrued expenses totaling \$3,645 made to the Secretary of State were not properly disclosed on the initial Form 460 Preelection Statement filed for the period January 1 through April 23, 2022. The accrued expenses were disclosed on amendments filed after the Primary election on October 27, 2022 for the period ending April 23, 2022.

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, which includes an administrative penalty of \$20,000. The Attorney General is representing the Commission. A response to the petition is due by March 26, 2026.

B. Outreach and Training

Webinars & Workshops

January

- January 6, the FPPC presented a Statement of Economic Interests Filers webinar requested by California Earthquake Authority. Political Reform Consultants Stephen Hernandez and Alexandra Miner, presented. 23 people attended.
- January 7, the FPPC presented a Statement of Economic Interests Filers webinar. Political Reform Consultants Christian Durham and Alexandra Miner, presented. 33 people attended.
- January 8, the FPPC presented a Statement of Economic Interests Filers webinar requested by California State Teachers' Retirement System. Political Reform Consultants Alexandra Miner and Christian Durham, presented. 43 people attended.
- January 9, the FPPC presented a Candidate/Treasurer – Getting Started webinar. Political Reform Consultants Stephen Hernandez and Christian Durham, presented. 37 people attended.
- January 14, the FPPC presented a Statement of Economic Interests Filers webinar requested by Fresno Unified School District. Political Reform Consultants Stephen Hernandez and Kathryn Ito, presented. 108 people attended.
- January 20, the FPPC presented a Statement of Economic Interests Filers webinar requested by Fresno Unified School District. Political Reform Consultants Kathryn Ito and Stephen Hernandez, presented. 114 people attended.
- January 20, the FPPC presented a Statement of Economic Interests Filing Officer webinar requested by Sonoma County Counsel's Office. Political Reform Consultants Alexandra Miner and Christian Durham, presented. 16 people attended.
- January 22, the FPPC presented a Statement of Economic Interests Filing Officer webinar. Political Reform Consultants Kathryn Ito and Stephen Hernandez, presented. 82 people attended.

February

- February 4, the FPPC presented a Statement of Economic Interests Filers webinar. Political Reform Consultants Stephen Hernandez and Christian Durham, presented. 40 people attended.
- February 5, General Counsel Dave Bainbridge presented a webinar on public agency campaign reporting requested by the Institute for Local Government. 183 people attended.
- February 10, the FPPC presented a Candidate/Treasurer webinar. Political Reform Consultants Christian Durham and Kathryn Ito, presented. 47 people attended.
- February 11, the FPPC presented a Statement of Economic Interests Filing Officer webinar. Political Reform Consultants Alexandra Miner and Stephen Hernandez, presented. 49 people attended.
- February 17, the FPPC presented a Statement of Economic Interests Filers webinar. Political Reform Consultants Christian Durham and Alexandra Miner, presented. 45 people attended.
- February 18, the FPPC presented a Statement of Economic Interests Filers webinar requested by the San Diego County Sheriff's Office. Political Reform Consultants Kathryn Ito and Stephen Hernandez, presented. 26 people attended.
- February 20, the FPPC presented a General Purpose Committee webinar. Political Reform Consultants Kathryn Ito and Alexandra Miner, presented. 49 people attended.
- February 24, the FPPC presented a Statement of Economic Interests Filers webinar requested by the San Diego County Sheriff's Office. Political Reform Consultants Stephen Hernandez and Kathryn Ito, presented. 28 people attended.
- February 25, the FPPC presented a Statement of Economic Interests Filers webinar. Political Reform Consultants Christian Durham and Stephen Hernandez, presented. 63 people attended.
- January 28, Senior Commission Counsel Karen Harrison presented a Statement of Economic Interests Filers and Gifts webinar requested by the California Judges Association. 243 people attended.

Scheduled Webinars & Workshops

- March 4, the FPPC is presenting a Statement of Economic Interests Filers webinar.
- March 11, the FPPC is presenting a Statement of Economic Interests Filing Officer webinar.
- March 17, the FPPC is presenting a Statement of Economic Interests Filers webinar.
- March 20, the FPPC is presenting a Completing Campaign Forms 460/497 webinar.

Video Tutorials: Commission video tutorials were accessed a total of 479 times in January and 743 times in February. Form 700 videos were accessed 310 times in January and 483 times in February. The Candidate/Treasurer video was accessed 127 times in January and 186 times in February. The filing officer videos were accessed 42 times in January and 74 times in February.

C. New and Updated Educational Resources

- 2025 [Recent Changes to the Political Reform Act Fact Sheet](#) and [Webpage](#)

- New [Top Ten Contributor List \(T-10\) – Excel Format](#)
- Updated Section 84308 Guides
 - [A Quick Guide for Officers and Section 84308](#)
 - [A Quick Guide for Parties, Participants, Agents and Section 84308](#)

D. Political Reform Education Program (PREP):

January

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments	Withdrawals
Statement of Economic Interests Course	19	11	4	31	0
Campaign Course for Local Candidates and Candidate-Controlled Committees	4	2	0	5	0
Campaign Course for State Candidates and Candidate-Controlled Committees	0	1	0	0	0
Campaign Course for Independent Expenditure and Major Donor Committees	3	2	0	1	0
Advertisement Course for Candidates and Candidate-Controlled Committees	1	0	0	1	0

February

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments	Withdrawals
Statement of Economic Interests Course	27	17	1	40	0
Campaign Course for Local Candidates and Candidate-Controlled Committees	1	2	0	4	0
Campaign Course for State Candidates and	0	0	0	0	0

Candidate-Controlled Committees					
Campaign Course for Independent Expenditure and Major Donor Committees	1	1	0	1	0
Advertisement Course for Candidates and Candidate-Controlled Committees	0	0	0	1	0

E. Advice

The [January Advice Letter Report](https://www.fppc.ca.gov/the-law/advice-letters-and-commission-opinions/advice-letter-reports/) is available on the FPPC website at <https://www.fppc.ca.gov/the-law/advice-letters-and-commission-opinions/advice-letter-reports/>.

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

- **Education:** The Education unit responded to 538 requests for technical assistance via telephone.
- **Email Requests for Advice:** Political Reform Consultants and Legal Division attorneys collectively responded to 683 email requests for advice, 485 of which were responded to within 24 hours, and 550 of which were responded to within 48 hours.
- **Advice Letters:** The Legal Division received 5 advice letter requests under the Political Reform Act and completed 6.
- **Section 1090 Letters:** The Legal Division received 2 advice letter requests concerning Section 1090 and completed 2.

The [February Advice Letter Report](https://www.fppc.ca.gov/the-law/advice-letters-and-commission-opinions/advice-letter-reports/) is available on the FPPC website at <https://www.fppc.ca.gov/the-law/advice-letters-and-commission-opinions/advice-letter-reports/>.

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

- **Education:** The Education unit responded to 573 requests for technical assistance via telephone.
- **Email Requests for Advice:** Political Reform Consultants and Legal Division attorneys collectively responded to 719 email requests for advice, 541 of which were responded to within 24 hours and 594 of which were not responded to within 48 hours.
- **Advice Letters:** The Legal Division received 4 advice letter requests under the Political Reform Act and completed 6.

- **Section 1090 Letters:** The Legal Division received 4 advice letter requests concerning Section 1090 and completed 7.

F. Miscellaneous Decisions

Regulation 18740 provides that an official or candidate is not required to disclose the name of a source of income on their Statement of Economic Interest if disclosure violates California or Federal law. The following exemption was approved in February:

- Kira Klatchko, Superior Court Judge (Ret.), Riverside County, is exempt from disclosing an arrangement for prospective employment pursuant to the canons of the Code of Judicial Ethics.

G. Upcoming Regulation Projects

April

Enforcement penalties – Amend “streamline” regulations to clarify Enforcement’s discretion to offer streamline settlements for violations that do not otherwise qualify for a reduced penalty, require the Commission to directly approve streamline fines, and consider existing inclusions and exclusion criteria. (Pre-notice)

AI Disclaimers on advertisements – Adopt a new regulation interpreting the disclaimer requirement in Section 84514³ for certain campaign advertisements generated or substantially altered using AI. Also, amend Regulation 18401 to provide specific guidance on the application of the Act’s recordkeeping requirement to committee advertisements, including advertisements subject to the disclaimer requirement in Section 84514. (Pre-notice)

May

Combined campaign statements and reports– Adopt a regulation pursuant to Section 84205 permitting candidates and committees to file combined campaign statements and reports in instances where reporting periods overlap and combining those periods will not reduce or delay disclosure. (Pre-notice)

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. (Pre-notice)

June

Enforcement penalties – Amend “streamline” regulations to clarify Enforcement’s discretion to offer streamline settlements for violations that do not otherwise qualify for a reduced penalty, require the Commission to directly approve streamline fines, and consider existing inclusions and exclusion criteria. (Adoption)

³ The Political Reform Act (“Act”) is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated.

AI Disclaimers on advertisements – Adopt a new regulation interpreting the disclaimer requirement in Section 84514⁴ for certain campaign advertisements generated or substantially altered using AI. Also, amend Regulation 18401 to provide specific guidance on the application of the Act’s recordkeeping requirement to committee advertisements, including advertisements subject to the disclaimer requirement in Section 84514. (Adoption)

H. Conflict of Interest Codes

State Agencies

- Santa Monica Bay Restoration Commission
- Department of Veterans Affairs
- Department of Motor Vehicles (DMV)
- Department of Insurance

Multi-County Agencies

- Fairfield-Suisan Unified School District
- Redwood Empire Municipal Insurance Fund
- West Valley Water District
- Nevada Joint Union High School District
- Colton Joint Unified School District
- Central Valley Energy Authority
- Merced Community College District
- Santa Cruz County Fire Agencies Insurance Group
- Amador-Tuolumne Community Action Agency
- Yolo Subbasin Groundwater Agency

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 Frank Guzman & 2022 Friends of Frank Guzman for Three Valleys Municipal Water District, Division 1, Case No. 2024-00354. On January 6, 2026, probable cause was found, on the papers submitted, that Respondents committed the following violation of the Act:

Count 1: Failure to Timely File a Statement of Organization

On or around September 24, 2022, the Committee and Guzman failed to timely file a statement of organization with the Secretary of State, due within 10 days of qualifying as a recipient committee, in violation of Government Code Section 84101.

⁴ The Political Reform Act (“Act”) is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated.

Count 2: Failure to Timely Amend a Statement of Organization

On or around October 30, 2022, the Committee and Guzman failed to timely file an amendment to the statement of organization with the Secretary of State, to reflect the correct qualification date, in violation of Government Code Section 84103.

Count 3: Failure to Timely File Pre-Election Campaign Statement

The Committee and Guzman failed to timely file a pre-election campaign statement for the reporting period of January 1, 2022 through September 24, 2022 by the September 29, 2022 due date, in violation of Government Code Sections 84200.5 and 84200.8.

Count 4: Failure to Timely File Pre-Election Campaign Statement

The Committee and Guzman failed to timely file a pre-election campaign statement for the reporting period of September 25, 2022 through October 22, 2022 by the October 27, 2022 due date, in violation of Government Code Sections 84200.5 and 84200.8.

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

The Committee and Guzman failed to timely file a semi-annual campaign statement for the reporting period of October 23, 2022 through December 31, 2022 by the January 31, 2023 due date, in violation of Government Code Section 84200.

Count 6: Failure to Timely File Semi-Annual Campaign Statement

The Committee and Guzman failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 due date, in violation of Government Code Section 84200.

Count 7: Failure to Timely File Semi-Annual Campaign Statement

The Committee and Guzman failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2023 through December 31, 2023 by the January 31, 2024 due date, in violation of Government Code Section 84200.

Count 8: Failure to Timely File Semi-Annual Campaign Statement

The Committee and Guzman failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2024 through June 30, 2024 by the July 31, 2024 due date, in violation of Government Code Section 84200.

Count 9: Failure to Timely File Semi-Annual Campaign Statement

The Committee and Guzman failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2024 through December 31, 2024 by the January 31, 2025 due date, in violation of Government Code Section 84200.

Count 10: Failure to Timely File Semi-Annual Campaign Statement

The Committee and Guzman failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2025 through June 30, 2025 by the July 31, 2025 due date, in violation of Government Code Section 84200.

Count 11: Failure to Timely File 24-Hour Contribution Report

The Committee and Guzman failed to timely file a 24-hour contribution report for a \$4,900 contribution received on October 31, 2022, due November 1, 2022, in violation of Government Code Section 84203.

Count 12: Failure to Timely File 24-Hour Contribution Report

The Committee and Guzman failed to timely file a 24-hour contribution report for a \$1,000 contribution received on November 3, 2022, due November 4, 2022, in violation of Government Code Section 84203.

Count 13: Failure to Accurately Report Contributions/Expenditures

The Committee and Guzman failed to accurately report contributions and expenditures on the pre-election campaign statement for the reporting period ending on September 24, 2022, in violation of Government Code Section 84211.

Count 14: Misuse of Committee Funds

The Committee and Guzman made payments totaling approximately \$3,884.37 to individuals that conferred a substantial personal benefit on the candidate, Guzman, and were not directly related to a political, legislative, or governmental purpose. In this way, the Committee and Guzman violated Government Code Sections 89510, 89512, and 89519.

Count 15: Misuse of Committee Funds

The Committee and Guzman made payments totaling approximately \$4,014.01 to numerous payees for entertainment and other personal purchases that conferred a substantial personal benefit on the candidate, Guzman, and were not directly related to a political, legislative, or governmental purpose. In this way, the Committee and Guzman violated Government Code Sections 89510, 89512, and 89519.

Count 16: Improper Cash Expenditures of \$100 or More

The Committee and Guzman made one cash expenditure of \$403 on November 22, 2022. By making a cash expenditure of \$100 or more, the Committee and Guzman violated Government Code Section 84300, subdivision (b).

Count 17: Comingling of Funds

On or about June 27, 2020 Guzman began transferring personal funds to the Committee's checking account and commingled campaign funds with personal funds in violation of Government Code Section 84307.

Count 18: Recordkeeping

The Committee and Guzman failed to maintain detailed campaign records for the Committee's contributions and expenditures for the life of the Committee, in violation of Government Code Section 84104.

In the Matter of: Liana LeBaron, Liana LeBaron for City Council 2020, Liana LeBaron Legal Defense Fund, and Liana for Mayor 2024, Case No. 2023-00823. On January 8, 2026, probable cause was found, on the papers submitted, that Respondents Liana LeBaron ("LeBaron"), Liana

LeBaron for City Council 2020 (“City Council Committee”), Liana LeBaron Legal Defense Fund (“Legal Defense Committee”), and Liana for Mayor 2024 (“Mayoral Committee”) committed the following violations of the Act:

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

LeBaron and the City Council Committee failed to timely file a semi-annual campaign statement for the reporting period of October 18, 2020 to December 31, 2020 by the February 1, 2021 deadline, in violation of Government Code Section 84200.

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

LeBaron and the City Council Committee failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2021 to June 30, 2021 by the August 2, 2021 deadline, in violation of Government Code Section 84200.

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

LeBaron and the City Council Committee failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2021 to December 31, 2021 by the January 31, 2022 deadline, in violation of Government Code Section 84200.

Count 4: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the City Council Committee failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2022 to June 30, 2022 by the August 1, 2022 deadline, in violation of Government Code Section 84200.

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

LeBaron and the City Council Committee failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2022 to December 31, 2022 by the January 31, 2023 deadline, in violation of Government Code Section 84200.

Count 6: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the City Council Committee failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2023 to June 30, 2023 by the July 31, 2023 deadline, in violation of Government Code Section 84200.

Count 7: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the City Council Committee failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2023 to December 31, 2023 by the January 31, 2024 deadline, in violation of Government Code Section 84200.

Count 8: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the City Council Committee failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2024 to June 30, 2024 by the July 31, 2024 deadline, in violation of Government Code Section 84200.

Count 9: Failure to Timely File a Preelection Campaign Statement

LeBaron and the City Council Committee failed to timely file a preelection campaign statement for the reporting period of July 1, 2024 to September 21, 2024 by the September 26, 2024 deadline, in violation of Government Code Sections 84200.5 and 84200.8, and Regulation 18405.

Count 10: Failure to Timely File a Preelection Campaign Statement

LeBaron and the City Council Committee failed to timely file a preelection campaign statement for the reporting period of September 22, 2024 to October 19, 2024 by the October 24, 2024 deadline, in violation of Government Code Sections 84200.5 and 84200.8, and Regulation 18405.

Count 11: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the City Council Committee failed to timely file a semi-annual campaign statement for the reporting period of October 20, 2024 to December 31, 2024 by the January 31, 2025 deadline, in violation of Government Code Section 84200.

Count 12: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the City Council Committee failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2025 to June 30, 2025 by the July 31, 2025 deadline, in violation of Government Code Section 84200.

Count 13: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the Legal Defense Committee failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2021 to December 31, 2021 by the January 31, 2022 deadline, in violation of Government Code Section 84200.

Count 14: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the Legal Defense Committee failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2022 to June 30, 2022 by the August 1, 2022 deadline, in violation of Government Code Section 84200.

Count 15: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the Legal Defense Committee failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2022 to December 31, 2022 by the January 31, 2023 deadline, in violation of Government Code Section 84200.

Count 16: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the Legal Defense Committee failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2023 to June 30, 2023 by the July 31, 2023 deadline, in violation of Government Code Section 84200.

Count 17: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the Legal Defense Committee failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2023 to December 31, 2023 by the January 31, 2024 deadline, in violation of Government Code Section 84200.

Count 18: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the Legal Defense Committee failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2024 to June 30, 2024 by the July 31, 2024 deadline, in violation of Government Code Section 84200.

Count 19: Failure to Timely File a Preelection Campaign Statement

LeBaron and the Legal Defense Committee failed to timely file a preelection campaign statement for the reporting period of July 1, 2024 to September 21, 2024 by the September 26, 2024 deadline, in violation of Government Code Sections 84200.5 and 84200.8, and Regulation 18405.

Count 20: Failure to Timely File a Preelection Campaign Statement

LeBaron and the Legal Defense Committee failed to timely file a preelection campaign statement for the reporting period of September 22, 2024 to October 19, 2024 by the October 24, 2024 deadline, in violation of Government Code Sections 84200.5 and 84200.8, and Regulation 18405.

Count 21: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the Legal Defense Committee failed to timely file a semi-annual campaign statement for the reporting period of October 20, 2024 to December 31, 2024 by the January 31, 2025 deadline, in violation of Government Code Section 84200.

Count 22: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the Legal Defense Committee failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2025 to June 30, 2025 by the July 31, 2025 deadline, in violation of Government Code Section 84200.

Count 23: Failure to Timely File the Statement of Organization with the Secretary of State

In 2024, LeBaron and the Mayoral Committee failed to timely file a statement of organization with the Secretary of State to report the qualification date of the Mayoral Committee within 10 days of qualifying as a committee, in violation of Government Code Section 84101.

Count 24: Failure to Timely File an Amended Statement of Organization with the City Clerk

In 2024, LeBaron and the Mayoral Committee failed to timely file an amended statement of organization with the City Clerk to report the qualification date of the Mayoral Committee within 10 days of qualifying as a committee, in violation of Government Code Section 84101.

Count 25: Failure to Timely File a 24-hour Contribution Report

LeBaron and the Mayoral Committee failed to timely file a 24-hour Contribution Report with the City Clerk to report a \$1,100 contribution received on August 30, 2024, within 24 hours of receiving the contribution, in violation of Government Code Section 84203.

Count 26: Failure to Timely File a 24-hour Contribution Report

LeBaron and the Mayoral Committee failed to timely file a 24-hour Contribution Report with the City Clerk to report two separate \$1,000 contributions received on September 18, 2024, within 24 hours of receiving the contribution, in violation of Government Code Section 84203.

Count 27: Failure to Timely File a 24-hour Contribution Report

LeBaron and the Mayoral Committee failed to timely file a 24-hour Contribution Report with the City Clerk to report a \$1,170 contribution received on October 21, 2024, within 24 hours of receiving the contribution, in violation of Government Code Section 84203.

Count 28: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the Mayoral Committee failed to timely file a semi-annual campaign statement with the City Clerk, for the reporting period of October 20, 2024 to December 31, 2024, by the January 31, 2025 deadline, in violation of Government Code Section 84200.

Count 29: Failure to Timely File a Semi-Annual Campaign Statement

LeBaron and the Mayoral Committee failed to timely file a semi-annual campaign statement with the City Clerk, for the reporting period of January 1, 2025 to June 30, 2025, by the July 31, 2025 deadline, in violation of Government Code Section 84200.

In the Matter of Committee to Elect Martha Camacho Rodriguez for Senate 2022, and Martha Camacho Rodriguez, Case No. 2022-00534. On January 29, 2026, probable cause was found, on the papers submitted, in a second Report in Support of a Finding of Probable Cause that Respondents, the Committee to Elect Martha Camacho Rodriguez for Senate 2022 (“the Committee”), and Martha Camacho Rodriguez committed the following violations of the Act:

Count 7: Failure to Timely File a Pre-election Campaign Statement

The Committee and Rodriguez failed to timely file a pre-election campaign statement for the reporting period of January 1, 2022, through April 23, 2022, by the April 28, 2022, deadline, in violation of Government Code Sections 84200.5 and 84200.8.

Count 8: Failure to Timely File a Semi-annual Campaign Statement

The Committee and Rodriguez failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2025 through June 30, 2025, by the July 31, 2025, deadline, in violation of Government Code Sections 84200.

In the Matter of: Jesus Eduardo Escobar, Case No. 2022-00378. On February 4, 2026, probable cause was found, on the papers submitted, that Respondent Jesus Eduardo Escobar (“Escobar”) committed the following violations of the Act:

Count 1: Failure to Timely File Annual SEI

Escobar failed to timely file a 2021 Annual SEI for the alternate board member role at Golden State Finance Authority by the April 1, 2022 due date, in violation of Government Code Section 87300.

Count 2: Failure to Timely File Annual SEI

Escobar failed to timely file a 2022 Annual SEI for the alternate board member role at Golden State Finance Authority by April 3, 2023, in violation of Government Code Section 87300

Count 3: Failure to Timely File Assuming Office SEI

Escobar failed to timely file an Assuming Office SEI for the alternate board member role at Rural Counties' Joint Powers Authority by February 1, 2021, in violation of Government Code Section 87300.

Count 4: Failure to Timely File Leaving Office SEI

Escobar failed to timely file a Leaving Office SEI for the alternate board member role at Rural Counties' Joint Powers Authority by January 31, 2022, in violation of Government Code Section 87300.

Count 5: Failure to Timely File Annual SEI

Escobar failed to timely file a 2020 Annual SEI for the alternate board member role at SANDAG by April 1, 2021, in violation of Government Code Section 87300.

Count 6: Failure to Timely File Annual SEI

Escobar failed to timely file a 2022 Annual SEI for the alternate board member role at SANDAG by April 3, 2023, in violation of Government Code Section 87300.

In the Matter of R.A. Drewn Esquer, Case No. 2024-00339. On February 4, 2026, probable cause was found, on the papers submitted, that Respondent committed the following violation of the Act:

Count 3: Failure to Timely File 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.

In the Matter of Bill Pai, Bill Pai for Alameda City Council 2022, and Joyce Boyd, Case No. 2022-00792. On February 4, 2026, probable cause was found, on the papers submitted, that Respondents committed the following violation of the Act:

Count 1: Failure to Timely File Statement of Organization

The Committee, Pai, and Boyd failed to timely file an amendment to the Statement of Organization with the Secretary of State to disclose the Committee's date of qualification of August 19, 2022 by the August 29, 2022 due date, in violation of Government Code Sections 84101 and 84103.

Count 2: Failure to Timely File Statement of Organization

The Committee, Pai, and Boyd failed to timely file an amendment to the Statement of Organization with the Clerk of the City of Alameda to disclose the Committee's date of qualification of August 19, 2022 by the August 29, 2022 due date, in violation of Government Code Sections 84101 and 84103.

Count 3: Failure to Timely File Pre-Election Campaign Statement

The Committee, Pai, and Boyd failed to timely file a first pre-election campaign statement for the reporting period of July 1, 2022 through September 24, 2022 by the September 29, 2022 due date, in violation of Government Code Sections 84200.5 and 84200.8.

Count 4: Failure to Disclose All Required Information in Campaign Statements

The Committee, Pai, and Boyd failed to timely report all contributions made to Committee, all the contributor information required to be disclosed, all expenditures paid by the Committee, and all payee information required to be disclosed on the first pre-election campaign statement covering the reporting period of July 1, 2022 through September 24, 2022 by the September 29, 2022 due date, in violation of Government Code Section 84211.

Count 5: Failure to Timely File Pre-Election Campaign Statement

The Committee, Pai, and Boyd failed to timely file a second pre-election campaign statement for the reporting period of September 25, 2022 through October 22, 2022 by the October 27, 2022 due date, in violation of Government Code Sections 84200.5 and 84200.8.

Count 6: Failure to Disclose All Required Information in Campaign Statements

The Committee, Pai, and Boyd failed to timely report all contributions made to Committee, all expenditures paid by the Committee, and all payee information required to be disclosed on the second pre-election campaign statement covering the reporting period of September 25, 2022 through October 22, 2022 by the October 27, 2022 due date, in violation of Government Code Section 84211.

Count 7: Failure to Timely File Semi-Annual Campaign Statement

The Committee, Pai, and Boyd failed to timely file a semi-annual campaign statement for the reporting period of October 23, 2022 through December 31, 2022 by the January 31, 2023 due date, in violation of Government Code Section 84200.

Count 8: Failure to Disclose All Required Information in Campaign Statements

The Committee, Pai, and Boyd failed to timely report all contributions made to the Committee and all expenditures paid by the Committee on the semi-annual campaign statement for the reporting period of October 23, 2022 through December 31, 2022 by the January 31, 2023 due date, in violation of Government Code Section 84211.

In the Matter of: Sigala for Tulare City Council 2020, Dist. 1; Sigala for Tulare City Council 2024 Dist. 1; Jose Sigala; Consuelo Diaz, Case No: 2021-00126. On February 5, 2026, probable cause was found, on the papers submitted, that Respondents Sigala for Tulare City Council 2020, Dist. 1 (“2020 Committee”); Sigala for Tulare City Council 2024 Dist. 1 (“2024 Committee”); Jose Sigala (“Sigala”); Consuelo Diaz (“Diaz”) committed the following violations of the Act:

Sigala, Diaz, and the 2020 Committee

Count 1: Failure to Timely File a Pre-election Campaign Statement

Sigala, Diaz, and the 2020 Committee failed to timely file a first pre-election campaign statement for the reporting period of January 1, 2020 through September 19, 2020 by the September 24, 2020 due date, in violation of Government Code Sections 84200.5 and 84200.8.

Count 2: Failure to Timely File Pre-election Campaign Statement

Sigala, Diaz, and the 2020 Committee failed to timely file a second pre-election campaign statement for the reporting period of September 20, 2020 through October 17, 2020 by the October 22, 2020 due date, in violation of Government Code Sections 84200.5 and 84200.8.

Count 3: Failure to Timely File Semi-annual Campaign Statement

Sigala, Diaz, and the 2020 Committee failed to timely file a semi-annual campaign statement for the reporting period of October 18, 2020, through December 31, 2020, by the February 1, 2021, due date in violation of Government Code Section 84200.

Count 4: Failure to Timely File Semi-annual Campaign Statement

Sigala, Diaz, and the 2020 Committee failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2021 through June 30, 2021 by the August 2, 2021 due date in violation of Government Code Section 84200.

Count 5: Failure to Semi-annual Campaign Statement

Sigala, Diaz, and the 2020 Committee failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2021 through December 31, 2021 by the January 31, 2022 due date in violation of Government Code Section 84200.

Count 6: Failure to Timely File Semi-annual Campaign Statement

Sigala, Diaz, and the 2020 Committee failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2022 through June 30, 2022 by the August 1, 2022 due date in violation of Government Code Section 84200

Count 7: Failure to Timely File Semi-annual Campaign Statement

Sigala, Diaz, and the 2020 Committee failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023 due date in violation of Government Code Section 84200.

Count 8: Failure to Timely File Semi-annual Campaign Statement

Sigala, Diaz, and the 2020 Committee failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2023 through June 30, 2023 by the July 31, 2023 due date in violation of Government Code Section 84200.

Count 9: Failure to Timely File Semi-annual Campaign Statement

Sigala, Diaz, and the 2020 Committee failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2023 through December 31, 2023 by the January 31, 2024 due date in violation of Government Code Section 84200.

Count 10: Failure to Timely File Semi-annual Campaign Statement

Sigala, Diaz, and the 2020 Committee failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2024, through June 30, 2024, by the July 31, 2024, due date in violation of Government Code Section 84200.

Count 11: Failure to Timely File Pre-election Campaign Statement

Sigala, Diaz, and the 2020 Committee failed to timely file a first pre-election campaign statement for the reporting period of July 1, 2024 through September 21, 2024 by the September 26, 2024 due date, in violation of Government Code Sections 84200.5 and 84200.8.

Count 12: Failure to Timely File Pre-election Campaign Statement

Sigala, Diaz, and the 2020 Committee failed to timely file a second pre-election campaign statement for the reporting period of September 22, 2024 through October 19, 2024 by the October 24, 2024 due date, in violation of Government Code Sections 84200.5 and 84200.8.

Count 13: Failure to Timely File Semi-annual Campaign Statement

Sigala, Diaz, and the 2020 Committee failed to timely file a semi-annual campaign statement for the reporting period of October 20, 2024 through December 31, 2024 by the January 31, 2025 due date in violation of Government Code Section 84200.

Count 14: Failure to Timely File Semi-annual Campaign Statement

Sigala, Diaz, and the 2020 Committee failed to timely file a semi-annual campaign statement for the reporting period of January 1, 2025 through June 30, 2025 by the July 31, 2025 due date in violation of Government Code Section 84200.

Sigala and the 2024 Committee

Count 15: Failure to Timely File Statement of Organization

Sigala and the 2024 Committee failed to timely file a qualifying Statement of Organization on or before September 26, 2024, in violation of Government Code Section 84101.

Count 16: Failure to Timely File Pre-election Campaign Statement

Sigala and the 2024 Committee failed to timely file a first pre-election campaign statement for the reporting period of July 1, 2024 through September 21, 2024 by the September 26, 2024 due date, in violation of Government Code Sections 84200.5 and 84200.8.

Count 17: Failure to Timely File Pre-election Campaign Statement

Sigala and the 2024 Committee failed to timely file a second pre-election campaign statement for the reporting period of September 22, 2024 through October 19, 2024 by the October 24, 2024 due date, in violation of Government Code Sections 84200.5 and 84200.8.

Count 18: Failure to Timely File Semi-annual Campaign Statement

Sigala and the 2024 Committee failed to timely file a semi-annual campaign statement for the reporting period of October 20, 2024 through December 31, 2024 by the January 31, 2025 due date in violation of Government Code Section 84200.

In the Matter of Robert Smart, Case No. 2025-00035. On February 12, 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 2020 Annual SEI

Smart failed to timely file 2020 Annual SEI by April 1, 2021, in violation of Section 87300.

Count 2: Failure to Timely File 2021 Annual SEI

Smart failed to timely file 2021 Annual SEI by April 1, 2022, in violation of Section 87300.

Count 3: Failure to Timely File 2022 Annual SEI

Smart failed to timely file 2022 Annual SEI by April 3, 2023, in violation of Section 87300.

Count 4: Failure to Timely File 2023 Annual SEI

Smart failed to timely file 2023 Annual SEI by April 2, 2024, in violation of Section 87300.

Count 5: Failure to Timely File 2024 Annual SEI

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

In the Matter of Maria Yanely Martinez, Case No. 2021-00669. On February 20, 2026, probable cause was found, on the papers submitted, that Respondent committed the following violation of the Act:

Count 1: Failure to Timely Disclose All Reportable Economic Interests on the Candidate SEI

Martinez failed to timely disclose all reportable economic interests on the Candidate SEI for the City of Greenfield mayoral office, filed on August 12, 2022, in violation of Government Code Section 87201.

Count 2: Failure to File a Leaving Office SEI

Martinez failed to timely file a Leaving Office SEI for the councilmember's office for the City of Greenfield by the January 9, 2025 due date, in violation of Government Code section 87204.

IV. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: JUE WANG, PhD, CHIEF OF ADMINISTRATION

A. New Employee Report

Enforcement Division

Phillip Willkomm, Special Investigator

Christine Shantz, Attorney

Katelyn Rader, Staff Services Analyst (Promotion)

Legal Division

Maia Kocinsky-Kirkham

B. Hiring Process

Enforcement Division

Attorney

Management Services Technician

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

March 2 Filing Status

As of March 5, 2026, 98% of the March 2 group have submitted Form 700 electronically.

March 2 Group	Total	Filed on time	Filed late	Not Filed
Constitutional Officers	52	40	6	6
Courts	2293	2196	53	44
Legislature	120	120	0	0
State Agencies	18	17	0	1
Total	2483	2373	59	51
		96%	2%	2%

April 1 Filing Status

A 30-day reminder email was sent on 3/2/2026 for the 2025 annual statement filers. As of March 6, 2026, the SEI unit expects to receive 22,060 annual statements through the e-filing system,

which is approximately 30% more than last year. The SEI unit is receiving additional lists of public officials who manage public investments and will upload them to the system in batches.

SEI Unit January and February 2026 Summary

- Referred 18 cases to the Enforcement
- Issued 32 fine letters
- Issued 331 Non-filer letters and 13 Amendment letters
- Processed 48 Form 462
- Responded 12,546 emails from form700@fppc.ca.gov and 386 phones calls
- Re-certified 19 existing local e-filing systems and approved 2 new local e-filing systems

Form 700 Search Portal

A new online Form 700 search portal with more advanced search features was successfully launched on March 11. A live press training was held on Thursday, March 12.

D. Collection/Revenue

July 2025 – February 2026 Report of Collection

Category	Check	Credit Card	FTB Offset	Total
SEI Filing Fee	\$ 29,000	-	-	\$ 29,000
SEI Fine	\$ 3,944	\$ 22,205	\$ 3,777	\$ 29,926
PREP	\$ 100	\$ 10,650	-	\$ 10,750
Enforcement Collection	\$ 800	\$ 1,500	\$ 1,566	\$ 3,866
Enforcement Stipulations	\$ 84,432	\$ 45,707	-	\$ 130,139
Reimbursement	\$ 268,497	-	-	\$ 268,497
Total	\$ 386,773	\$ 80,062	\$ 5,343	\$ 472,178

E. Information Technology

A redesigned website featuring enhanced search tools was successfully launched on February 6, 2026.