



EXECUTIVE STAFF REPORTS

May 14, 2026 Commission Hearing

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I. ENFORCEMENT DIVISION

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

A. Overview

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

	Sworn	Non-Sworn	Anonymous	Referrals
Number Received	118	27	157	205

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

For the months of March and April, more time to respond beyond the 14-day statutory period was needed for approximately 31 sworn complaints.

Additionally, for the months of March and April, the Enforcement Division opened 152 cases, rejected 219 complaints and referrals, and closed a total of 142 cases including:

- 41 warning letters – statement of economic interests violations (35) and campaign violations (6)
- 48 no action closure letters: PREP completed –advertisement violations (1), statement of economic interests violations (41), gift violations (1), and campaign violations (5);
- 9 no action closure letters alleging – conflict of interest violations (1), campaign violations (1), and statement of economic interests violations (7);
- 29 approved stipulations from the March Commission Meeting;
- 3 advisory letters;
- 12 administrative terminations.

The Division had a total of 949 cases in various stages of resolution at the time of the March Monthly Report and currently has approximately 959 cases in various stages of resolution, including the 18 streamline, 4 mainline, and 1 pre-notice default cases before the Commission as listed in the May Agenda. Net case openings since the last monthly report totaled 10.

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.

	March 2025	June 2025	September 2025	December 2025	March 2026	Difference in Existing Caseload Overall
2018	3	1	1	1	1	-2
2019	11	8	8	6	5	-6
2020	24	14	11	9	5	-19
2021	54	42	33	30	25	-29
2022	119	104	91	83	79	-40
2023	171	154	148	133	120	-51
2024	318	295	270	251	242	-76
2025	--	--	--	--	301	--

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 Affordable Housing Advocates Santa Cruz; FPPC No. 24/568.](#) Staff: Laura Columbel, Senior Commission Counsel and Jay Gehres, Special Investigator. Affordable Housing Advocates Santa Cruz is a local primarily formed committee. Don Lane served as the treasurer. The Committee failed to include the proper advertisement disclosures in mailers, flyers, a website, and an electronic media ad, in violation of Government Code Sections 84502, 84504.2, and 84504.3 (9 counts). **Total Penalty: \$1,946 (Tier One).**

Campaign Late Filer/Reporter

[In the Matter of WeLead OC Fund and Karen Hinks; FPPC No. 19/1773.](#) Staff: Theresa Gilbertson, Attorney Supervisor and George Aradi, Special Investigator. WeLead OC Fund, a multipurpose organization, qualified as a recipient committee in 2019 when the organization

accepted a payment of more than \$2,000 for the purpose of making an independent expenditure. Karen Hinks was the principal officer and treasurer. The Committee failed to timely file a statement of organization, a semiannual campaign statement, and a late independent expenditure report, in violation of Government Code Sections 84222, 84200, and 84204 (3 counts). Additionally, the independent expenditure was a mailer that failed to comply with the Act's requirements for advertisement disclosure, in violation of Government Code Sections 84502 and 84504.2 (1 count). **Total Penalty: \$1,755 (Tier Two).**

[In the Matter of California Political Rebuild Team, Orrin Heatlie, and Robyn Riley; FPPC No. 25/112.](#) Staff: Chance Felkins, Commission Counsel. This matter arose from an audit performed by the Franchise Tax Board's Political Reform Audit Program. California Political Rebuild Team is a general-purpose committee. The Committee's treasurer is Robyn Riley. The Committee's principal officer is Orrin Heatlie. The Committee failed to timely report occupation and employer information for contributions made on a quarterly campaign statement, two semi-annual campaign statements, and two pre-election campaign statements, in violation of Government Code Section 84211(f) (5 counts). **Total Penalty: \$1,125 (Tier Two).**

Statement of Economic Interests Late Filer/Reporter

[In the Matter of Ariel Kelley; FPPC No. 24/1012.](#) Staff: Jaleena Evans, Commission Counsel. The respondent is represented by Gary Winuk of Kaufman Legal Group. Ariel Kelley is a City Councilmember for the City of Healdsburg and a Commissioner for the California Coastal Commission. Kelley failed to timely file an Assuming Office Statement of Economic Interests for her position with the California Coastal Commission, in violation of Government Code Section 87202 (1 count), failed to timely report income on the 2021 Annual Statement of Economic Interests for the City Council, in violation of Government Code Section 87207 (1 count), and failed to timely report stocks on the 2023 and 2024 Annual Statements of Economic Interests for the City Council, in violation of Government Code Section 87206 (2 counts). **Total Penalty: \$1,600 (Tiers One and Two).**

[In the Matter of Casey McKeon; FPPC No. 26/206.](#) Staff: Christine Shantz, Commission Counsel and Paul Rasey, Special Investigator. Casey McKeon, City Council Member of Huntington Beach, failed to timely report two gifts on an Assuming Office Statement of Economic Interests, in violation of Government Code section 87202 (2 counts). **Total Penalty: \$700 (Tiers One and Two).**

[In the Matter of Erik Peterson; FPPC No. 23/652.](#) Staff: Christine Shantz, Commission Counsel and Special Investigator Paul Rasey. Erik Peterson, Member of the City Council of Huntington Beach, failed to timely report a gift on a Leaving Office Statement of Economic Interests, in violation of Government Code Section 87204 (1 count). **Total Penalty: \$600 (Tier Two).**

[In the Matter of Pat Burns; FPPC No. 26/205.](#) Staff: Christine Shantz, Commission Counsel and Special Investigator Paul Rasey. Pat Burns, Candidate for City Council of Huntington Beach, failed to report two gifts on an Assuming Office Statement of Economic Interests, in

violation of Government Code section 87202 (2 counts). **Total Penalty: \$700 (Tiers One and Two).**

In the Matter of Michael Gates; FPPC No. 26/208. Staff: Christine Shantz, Commission Counsel and Paul Rasey, Special Investigator. Michael Gates, City Attorney for Huntington Beach, failed to timely report a gift on a 2023 Annual Statement of Economic Interests, in violation of Government Code Section 87203 (1 Count). **Total Penalty: \$600 (Tier Two).**

In the Matter of Alex Ferguson; FPPC No. 26/188. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Alex Ferguson, a Planning Commissioner for the City of Pacifica, 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 Ashley Banta; FPPC No. 26/091. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Ashley Banta, a Planning Commissioner for the City of Vacaville, 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 Briana Weisinger; FPPC No. 26/136. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Briana Weisinger, an Associate Regional Director of the Small Business Development Center Network for the Southwestern Community College District, 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 Emma Orozco; FPPC No. 25/762. Staff: Theresa Gilbertson, Supervising Attorney and Joselyne Soto, Associate Governmental Program Analyst. Emma Orozco, as Planning Commissioner for the City of Calipatria failed to timely file a 2023 Annual SEI, in violation of Government Code Sections 87203 (1 count). **Total Penalty: \$200 (Tier One).**

In the Matter of Ilan Sigura; FPPC No. 26/099. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Ilan Sigura, a Planning Commissioner for the City of Sunnyvale, 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 Jazmine Hernandez; FPPC No. 25/1050. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Jazmine Hernandez, a Planning Commissioner for the City of Stockton, 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 Marco Durazo; FPPC No. 26/182. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Marco Durazo, a

Planning Commissioner for the City of San Bruno, 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 Namquan Nguyen; FPPC No. 26/147. Staff: Kendall L.D. Bonebrake, Chief of Enforcement and Amber Rodriguez, Associate Governmental Program Analyst. Namquan Nguyen, a City Council Member for the City of Westminster, 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 Raj Salwan; FPPC No. 24/1280. Staff: Franceska Gonzalez, Commission Counsel. Raj Salwan, Fremont City Councilmember and Alameda County Transportation Commission Board Member, failed to timely disclose a financial interest on the 2023 Annual Statement of Economic Interests in violation of Government Code Section 87206 (1 count), and a Candidate Statement of Economic Interests for the November 5, 2024 General Election, in violation of Government Code Section 87207 (1 count). **Total Penalty: \$200 (Tier One).**

In the Matter of Gracey Van Der Mark; FPPC No. 26/207. Staff: Christine Shantz, Commission Counsel and Special Investigator Paul Rasey. Gracey Van Der Mark, as a member of the City Council in Huntington Beach, failed to timely report a gift on an Assuming Office Statement of Economic Interests, in violation of Government Code section 87207 (1 Count). **Total Penalty: \$100 (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 March 1, 2026, to April 30, 2026, the Audits and Assistance Division adopted seven audit reports, five with findings and two with no findings. Currently, the team has 40 audits in progress at various stages, including fieldwork, post-fieldwork, and quality review.

Details of the audit reports adopted are as follows:

1. Henry Gomez Nickel for Mayor 2022 (ID# 1447330)

- **Finding 1: Form 470 Supplement Not Filed**

A Form 470 Supplement was not filed with the City of San Bernardino Clerk's Office and each candidate's office within 48 hours after receiving contributions of more than \$2,000. The Committee filed a Form 470 on March 11, 2022 with the City of San Bernardino Clerk's Office and was required to file a Form 470 Supplement upon receiving more than \$2,000 in contributions on April 22, 2022.

- **Finding 2: Form 410 Amendment Not Filed**

An amendment to the Form 410 Statement of Organization was not filed with the Secretary of State and the City of San Bernardino Clerk's Office within 10 days to indicate the date the qualification threshold was met, as required. The initial Form 410 was filed before the Committee qualified on April 12, 2022, but the Committee did not file a Form 410 amendment within 10 days after meeting the qualification threshold on April 22, 2022.

- **Finding 3: Reported Contributions Understated**

Reported contributions received were overstated by \$2,400 on the Form 460 Campaign Disclosure Statements filed for the period ending May 21, 2022 and understated by \$2,400 on the Form 460 Campaign Disclosure Statements period ending October 11, 2022. The deposit of a \$2,400 contribution was returned by the bank on April 27, 2022, but the contribution was included in contributions received on the Form 460 Campaign Disclosure Statements for the period ending May 21, 2022. The Form 460 Campaign Disclosure Statements for the period ending October 11, 2022 reported the return of the contribution by reporting it as a negative contribution received on Schedule A of the Form 460 Campaign Disclosure Statements. Amendments were not filed after the election to correct the misreporting.

- **Finding 4: Subvendor Expenditures Overstated**

Subvendor expenditures to Minuteman Press totaling \$3,746 were not reported on the Form 460 Preelection Statements for the period ending May 21, 2022. The expenditures were reported after the election on the Form 460 Semi-annual Statements for the period ending June 30, 2022.

- **Finding 5: Accrued Expenses Not Disclosed**

Expenditures totaling \$6,251 were not accrued on the Form 460 Campaign Disclosure Statements and were reported when paid after the election, on the Form 460 Campaign Disclosure Statements filed for the periods ending June 30, 2022 and October 11, 2022. Of these expenditures \$6,199 were reportable before the election on the Form 460 Preelection Statements for the period ending May 21, 2022.

2. Mullissa Willette for CalPERS Board 2022 (ID# 1441608)

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

A Form 410 Statement of Organization was not filed with Secretary of State or CalPERS within 10 days of qualifying as a committee. The Form 410 Statement of Organization, due on November 9, 2021, was not filed until December 31, 2021 with the Secretary of State and January 5, 2022 with CalPERS, 52 days and 57 days late respectively.

3. Jose S. Altamirano for Board of Equalization-Dist, 1, 2022 (ID #1444908)

- **Finding: Contributions Received Understated on Form 460 Campaign Disclosure Statements**

Reported contributions received were understated on the Form 460 Campaign Disclosure Statements filed for the period October 23, 2022 through December 29, 2022. The understatement occurred due to a \$12,750 forgiven loan that was not reported as a contribution. No amendments were filed to correct the misreporting.

4. Margaret Brown Legal Defense Fund (ID# 1426091)

- **Finding 1: Contribution Records Not Maintained**

Copies of contributors' checks and duplicate deposit slips were not maintained for contributions received totaling \$12,530. Bank statements were provided.

- **Finding 2: Occupation/Employer Verification Records Not Maintained**

Occupation/employer records were not maintained for contributions totaling \$3,440 received from 26 individuals. The contributions were not returned.

- **Finding 3: Form 410 Statement of Organization Not Filed with CalPERS**

A Form 410 Statement of Organization filed with SOS on March 26, 2020, but was not filed with CalPERS. The Form 410 Statement of Organization was due by April 9, 2020.

- **Finding 4: Form 410 Statement of Organization Amendments Not Filed with CalPERS and Filed Late with the SOS**

Two amendments to the Form 410 Statement of Organization were not filed with CalPERS within 10 days of qualifying as a committee and within 10 days of terminating the committee. The amended Form 410 Statement of Organization reporting the date the committee qualified, due on April 9, 2020, was not filed with the SOS until April 13, 2020, 4 days late. The amended Form 410 Statement of Organization reporting the date the committee terminated, due on August 27, 2021, was not filed with the SOS until September 3, 2021, 7 days late.

- **Finding 5: Form 460 Campaign Disclosure Statements Not Filed with CalPERS and One Filed Late with the SOS**

Four Form 460 Campaign Disclosure Statements were not filed with CalPERS. The Form 460 Campaign Disclosure Statements were filed with the SOS. Three of the four Form 460 Campaign Disclosure Statements were filed with the SOS on time. The Form 460 Preelection Statement for the period ending August 17, 2021 was filed with the SOS on September 2, 2021, 8 days late.

- **Finding 6: Form 497 Contribution Reports Not Filed with the SOS or CalPERS**

Form 497 Contribution Reports were not filed with the SOS or CalPERS for 2 contributions received totaling \$11,330 and for 1 contribution made totaling \$4,773.

- **Finding 7: Prohibited Contribution Made with Surplus Funds**

A prohibited contribution for \$4,773 was made with surplus funds to the Margaret Brown for CalPERS Board 2021 (ID# 1421630) committee on July 4, 2021.

5. Mayor John Valdivia Legal Defense Fund (ID# 1426945)

- **Finding 1: Form 497- Contribution Report Not Filed**

A Form 497 Contribution Report was not filed with the City of San Bernardino Registrar of Voters for a \$10,000 loan received from the John Valdivia for Mayor 2022 (ID# 1397089) on May 6, 2022. A Form 497 Report was timely filed for one other loan received on April 7, 2022, for \$20,000.

- **Finding 2: Records not Maintained for Nonmonetary Contribution Received for Fundraising Consulting Services**

The Committee disclosed receiving a nonmonetary contribution in the amount of \$5,200 on its Form 460 Semi-Annual Statement for the period ending December 31, 2020, from the John Valdivia for Mayor 2022 Committee (ID# 1397089). The Committee did not maintain records to substantiate the specific nature or purpose of the \$5,200 nonmonetary contribution. However, on the Form 460, the Committee reported the contribution as being for fundraising consulting.

Legal Defense Fund committees may only raise funds in an amount reasonably calculated to pay, and may only expend funds for, attorney’s fees and other related legal costs.

“Attorney’s fees and other related legal costs” do not include expenses such as fundraising or political consulting services. Accordingly, acceptance of this nonmonetary contribution was not permissible because it funded an activity outside the allowable uses of funds for a Legal Defense Fund committee.

- **Finding 3: Accrued Expenses Not Reported Timely**

Accrued expenses totaling \$124,956 were not reported when incurred during the periods ending between December 31, 2020, and February 23, 2023. Of this amount, \$652 was disclosed after the June 7, 2022, Primary Election.

- **Finding 4: Accrued Expenses Disclosed Inaccurately**

Accrued expenses owed to Pacheco & Neach, P.C. for legal services totaling \$32,459 were reported as negative amounts in the “Amount Incurred This Period” column (Column (b)) of Schedule F on the Form 460 Termination Statement for the period

ending February 23, 2023. The “Code or Description of Payment” column listed only “LEG” for legal defense. The additional comments section of the Statement indicated that the debt was reduced through a renegotiation of legal fees, however, documentation substantiating the reduction was not provided and the \$32,459 was not reported as a nonmonetary contribution from Pacheco & Neach, P.C. Furthermore, invoices supporting \$30,006 of the accrued expenses reported were not provided.

6. Palkki for CalPERS Board 2022 (ID# 1445980)

- **No findings noted.**

7. Josie Gonzales for Assessor 2022 (ID# 1411426)

- **No findings noted.**

III. LEGAL DIVISION

STAFF: DAVE BAINBRIDGE, GENERAL COUNSEL

A. Pending Litigation

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

Evans v. FPPC, Superior Court, County of Sacramento, Case No. 26WM000121. Petitioner Steveonna Evans filed a petition for writ of mandate on April 28, 2026, seeking an order staying enforcement of the Default Decision and Order approved by the Commission on March 19, 2026, pending the hearing of a motion to vacate the Default Decision and Order that the petitioner filed with the Commission on April 24, 2026.

B. Outreach and Training

Webinars & Workshops

- March 4, the FPPC presented a Statement of Economic Interests Filers webinar. Political Reform Consultants Kathryn Ito and Stephen Hernandez, presented. 20 people attended.
- March 10, the FPPC presented a Candidate/Treasurer webinar requested by the County of San Diego. Political Reform Consultants Christian Durham and Stephen Hernandez, presented. 45 people attended.
- March 11, the FPPC presented a Statement of Economic Interests Filing Officer webinar. Political Reform Consultants Stephen Hernandez and Christian Durham, presented. 65 people attended.
- March 17, the FPPC presented a Statement of Economic Interests Filers webinar. Political Reform Consultant Christian Durham and Telephone Advice & Education Outreach Manager Vanessa Manriquez, presented. 30 people attended.
- March 20, the FPPC presented a Completing Campaign Forms 460/497 webinar. Political Reform Consultants Alexandra Miner and Kathryn Ito, presented. 27 people attended.
- April 9, the FPPC presented a Campaign Filing Officer webinar. Political Reform Consultants Alexandra Miner and Kathryn Ito, presented. 52 people attended.
- April 14, the FPPC presented a Completing Campaign Forms 460/497 webinar. Political Reform Consultants Christian Durham and Stephen Hernandez, presented. 30 people attended.
- April 15, the FPPC presented a Candidate/Treasurer webinar. Political Reform Consultants Kathryn Ito and Christian Durham, presented. 36 people attended.

- April 29, the FPPC presented a General Purpose Committee webinar. Political Reform Consultants Stephen Hernandez and Alexandra Miner, presented. 21 people attended.

Scheduled Webinars & Workshops

- May 6, the FPPC is presenting a Completing Campaign Forms 460/497 webinar.
- May 13, the FPPC is presenting a Candidate/Treasurer webinar.
- May 28, the FPPC is presenting a Campaign Filing Officer webinar.

Video Tutorials

In March, Commission video tutorials were accessed a total of 1,185 times. Form 700 videos were accessed 883 times, the Candidate/Treasurer video was accessed 209 times, and the filing officer videos were accessed 93 times.

In April, Commission video tutorials were accessed a total of 505 times. Form 700 videos were accessed 305 times, the Candidate/Treasurer video was accessed 155 times, and the filing officer videos were accessed 45 times.

C. New and Updated Educational Resources

- Updated [Reporting Behested Payments – Form 803 Webpage](#)
- Updated [Behested Payment Report \(Form 803\) Fact Sheet](#)
- Updated [San Bernardino City Candidate Checklist Fact Sheet](#)
- New [Sample Request Letter to Payee Organizations for Behested Payment Reports](#)
- Updated [Behested Payment Training Slides](#)
- New [Terminating a Candidate-Controlled Committee Subject to Default State Contribution Limits](#) Fact Sheet

D. Political Reform Education Program (PREP):

March

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments	Withdrawals
Statement of Economic Interests Course	16	14	1	40	1
Campaign Course for Local Candidates and Candidate-Controlled Committees	2	3	1	2	0
Campaign Course for State Candidates and	0	0	0	0	0

Candidate-Controlled Committees					
Campaign Course for Independent Expenditure and Major Donor Committees	3	0	0	4	0
Advertisement Course for Candidates and Candidate-Controlled Committees	1	1	0	1	0

April

Course	Referrals Received	Completions	Failures to Complete	Current Enrollments	Withdrawals
Statement of Economic Interests Course	17	25	3	29	0
Campaign Course for Local Candidates and Candidate-Controlled Committees	1	1	0	2	0
Campaign Course for State Candidates and Candidate-Controlled Committees	1	0	0	1	0
Campaign Course for Independent Expenditure and Major Donor Committees	2	4	0	2	0
Campaign Course for General Purpose and Primarily Formed Committees	3	1	0	2	0
Advertisement Course for Candidates and Candidate-Controlled Committees	2	0	0	3	0

E. Advice

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

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

- **Education:** The Education unit responded to 729 requests for technical assistance via telephone.
- **Email Requests for Advice:** Political Reform Consultants and Legal Division attorneys collectively responded to 631 email requests for advice, 522 of which were responded to within 24 hours, and 545 of which were responded to within 48 hours.
- **Advice Letters:** The Legal Division received 12 advice letter requests under the Political Reform Act and completed 9.
- **Section 1090 Letters:** The Legal Division received 9 advice letter requests concerning Section 1090 and completed 2.

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

- **Education:** The Education unit responded to 1,196 requests for technical assistance via telephone.
- **Email Requests for Advice:** Political Reform Consultants and Legal Division attorneys collectively responded to 982 email requests for advice, 750 of which were responded to within 24 hours, and 812 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 7.

Section 1090 Letters: The Legal Division received 10 advice letter requests concerning Section 1090 and completed 3.

F. Miscellaneous Decisions

None.

G. Upcoming Regulation Projects

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. (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)

August

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

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. (Adoption)

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. (Adoption)

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)

September

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

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

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.

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

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

- State Lands Commission
- California Cradle-to-Career Data System

Multi-County Agencies

- Gateway Community Charters
- Sacramento Area Sewer District
- CA Enterprise Development Authority

Extensions

- Governor's Military Council
- Wildfire Technology Research and Development Review Advisory Board
- 988 – Crisis Advisory Group

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 Jerry Carlos, Jerry Carlos for Assembly 2020, Katherine Houston, Jerry Carlos for Western Municipal Water District 2022, and Susan Doyle, Case No. 2023-00341.

On March 5, probable cause was found on the papers submitted to believe Respondents committed the following violations of the Act:

Carlos, the Assembly Committee, and Houston:

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

Carlos, the Assembly Committee, and Houston 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 due date, in violation of Government Code Section 84200.

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

Carlos, the Assembly Committee, and Houston 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 due date, in violation of Government Code Section 84200.

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

Carlos, the Assembly Committee, and Houston 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 due date, in violation of Government Code Section 84200.

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

Carlos, the Assembly Committee, and Houston 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 due date, in violation of Government Code Section 84200.

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

Carlos, the Assembly Committee, and Houston failed to timely file a pre-election campaign statement for the reporting period of July 1, 2022, to September 24, 2022, by the September 29, 2022 due date, in violation of Government Code Sections 84200.5 and 84200.8, and Regulation 18405.

Count 6: Failure to Timely File a Pre-Election Campaign Statement

Carlos, the Assembly Committee, and Houston failed to timely file a pre-election campaign statement for the reporting period of September 25, 2022 to October 22, 2022, by the October 27, 2022 due date, in violation of Government Code Sections 84200.5 and 84200.8, and Regulation 18405.

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

Carlos, the Assembly Committee, and Houston 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 due date, in violation of Government Code Section 84200.

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

Carlos, the Assembly Committee, and Houston 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 due date, in violation of Government Code Section 84200.

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

Carlos, the Assembly Committee, and Houston 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 due date, in violation of Government Code Section 84200.

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

Carlos, the Assembly Committee, and Houston 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 due date, in violation of Government Code Section 84200.

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

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

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

Carlos, the Assembly Committee, and Houston 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 due date, in violation of Government Code Section 84200.

Count 13: Impermissible Use of Surplus Campaign Funds

On or around August 11, 2022, Carlos, the Assembly Committee, and Houston impermissibly used \$1,000 of surplus campaign funds from the Assembly Committee to pay for Carlos' candidate fees for the Water Board election, in violation of Government Code Section 89519.

Carlos, the Water District Committee, and Doyle:

Count 14: Failure to Timely File a Pre-Election Campaign Statement

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

Count 15: Failure to Timely File a Pre-Election Campaign Statement

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

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

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

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

Carlos, the Water District Committee, and Doyle 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 due date, in violation of Government Code Section 84200.

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

Carlos, the Water District Committee, and Doyle 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 due date, in violation of Government Code Section 84200.

Count 19: Failure to Timely File a Semi-Annual Campaign Statement

Carlos, the Water District Committee, and Doyle 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 due date, in violation of Government Code Section 84200.

Count 20: Failure to Timely File a Semi-Annual Campaign Statement

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

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

Carlos, the Water District Committee, and Doyle 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 due date, in violation of Government Code Section 84200.

In the Matter of: Irma Raquel Muñoz, Case No: 2025-00167. On March 6, 2026, probable cause was found on the papers submitted to believe that Respondent Irma Raquel Muñoz (Muñoz) committed the following violations of the Act:

Count 1: Failure to Timely File a 2021 Annual SEI

Muñoz failed to timely file a 2021 Annual SEI by April 1, 2022 due date, as a Member of the Santa Monica Mountains Conservancy in violation of Section 87300.

Count 2: Failure to Timely File a 2021 Annual SEI:

Muñoz failed to timely file a 2021 Annual SEI by the April 1, 2022 due date, as a Board Member for the Mountains Recreation & Conservation Authority in violation of Government Code Section 87300.

Count 3: Failure to Timely File a 2022 Annual SEI:

Muñoz failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, as a Member of the Santa Monica Mountains Conservancy in violation of Government Code Section 87300.

Count 4: Failure to Timely File a 2022 Annual SEI:

Muñoz failed to timely file a 2022 Annual SEI by the April 3, 2023 due date, as a Board Member for the Mountains Recreation & Conservation Authority in violation of Government Code Section 87300.

Count 5: Failure to Timely File a 2023 Annual SEI:

Muñoz failed to timely file a 2023 Annual SEI by the April 2, 2024 due date, as a Member of the Santa Monica Mountains Conservancy in violation of Government Code Section 87300.

Count 6: Failure to Timely File a Leaving Office SEI:

Muñoz failed to timely file a Leaving Office SEI within 30 days of Leaving their position as a Board Member for the Mountains Recreation & Conservation Authority in violation of Government Code Section 87300.

Count 7: Failure to Timely File a 2024 Annual SEI:

Muñoz failed to timely file a 2024 Annual SEI by the June 2, 2025 due date, as a Member of the Santa Monica Mountains Conservancy in violation of Government Code Section 87300.

In the Matter of Elissa Robinson, Case No. 2025-00658. On March 11, 2026, probable cause was found on the papers submitted to believe that Respondents committed the following violation of the Act:

Count 1: Failure to Timely File a 2022 Annual SEI

Robinson failed to timely file a 2022 Annual SEI by April 3, 2023 due date, in violation of Section 87203.

Count 2: Failure to Timely File a 2023 Annual SEI

Robinson failed to timely file a 2023 Annual SEI by April 2, 2024 due date, in violation of Section 87203.

Count 3: Failure to Timely File a 2024 Annual SEI

Robinson failed to timely file a 2024 Annual SEI by April 1, 2025 due date, in violation of Section 87203.

In the Matter of: Angelina Rodriguez, Case No. 2024-00238. On April 13, 2026, probable cause was found on the papers submitted to believe that Respondent Angelina Rodriguez (“Rodriguez”) committed the following violations of the Act:

Count 1: Failure to Timely File Assuming Office SEI

Rodriguez failed to timely file an Assuming Office SEI by April 6, 2022, in violation of Section 87300.

Count 2: Failure to Timely File 2022 Annual SEI

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

Count 3: Failure to Timely File 2023 Annual SEI

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

Count 4: Failure to Timely File Leaving Office SEI

Rodriguez failed to timely file a Leaving Office SEI by June 20, 2024, in violation of Section 87300.

In the Matter of Timothy Banuelos, Case No. 2025-00634. On April 27, 2026, probable cause was found based on the papers submitted to believe that Respondent committed the following violation of the Act:

Count 1: Failure to Timely File a 2023 Annual SEI

Banuelos failed to timely file a 2023 Annual SEI by April 2, 2024, in violation of Section 87203.

Count 2: Failure to Timely File a Leaving Office SEI

Banuelos failed to timely file a Leaving Office SEI by May 30, 2024, in violation of Section 87204.

In the Matter of Bryan J. Holmes , Case No. 2024-01228. On April 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 2021 Annual SEI

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

Count 2: Failure to Timely File 2022 Annual SEI

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

Count 3: Failure to Timely File 2023 Annual SEI

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

In the Matter of Christopher Edgar, Case No. 2024-00357. On April 29, 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

Edgar failed to timely file an Assuming Office SEI by the February 23, 2023 due date, in violation of Section 87300.

Count 2: Failure to Timely File a 2023 Annual SEI

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

IV. ADMINISTRATION & TECHNOLOGY DIVISION

STAFF: JUE WANG, PhD, CHIEF OF ADMINISTRATION

A. New Employee Report

None.

B. Hiring Process

Enforcement Division

Attorney

Management Services Technician

Supervisor I

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

March 2 Filing Status

As of May 1, 2026, 99.84% of the March 2 group have submitted Form 700 electronically. 4 non-filers remain, and non-filer letters have been sent out.

March 2 Group	Total	Filed on time	Filed late	Not Filed
Constitutional Officers	52	40	12	0
Courts	2,288	2,196	88	4
Legislature	120	120	0	0
State Agencies	18	17	1	0
Total	2,478	2,373	101	4
		95.76%	4.08%	0.16%

April 1 Filing Status

As of May 1, 2026, **22,502** 2025 annual statements have been successfully filed through FPPC's E-filing system, representing approximately 95% of the total. The first non-filer letters were sent out on May 8, 2026.

Entity	Total	Filed	Not Filed
Cities A - M	3,847	3,615	232
Cities N - Z	2,891	2,736	155
Counties	4,473	4,135	338
Courts	4	4	0
GSA	1,614	1,526	88
Keenan	17	17	0
Legislative Staffers	1,612	1,587	25
Multi-County Agencies	6,143	5,890	253
State Agencies	3,111	2,992	119
Total	23,712	22,502	1,210
		94.9%	5.1%

Below is a comparison of the 2025 Annual Statement and the 2024 Annual Statement at the same point in the year. The total number of 2025 Annual Statements has increased from 16,921 to 23,712, reflecting a growth of approximately 40 percent. This increase is attributable to the implementation of SB 852, which expanded the list of individuals for whom the Commission serves as the filing officer for Statements of Economic Interest to include public officials who manage public investments. As of May 1, 2026, a total of 5,810 SB 852 filers have been added to the system.

	2025 Annual (Due: 04/01/2026)	2024 Annual (Due: 04/01/2025)	Difference
Total Expected Annual Statements	23,712	16,921	6,791
Filed	22,502	16,166	6,336
Not Filed	1210	755	455
Filing Rate	94.9%	95.5%	-0.6%

SEI Unit March 2026 Summary

- Referred 4 cases to the Enforcement
- Issued 6 fine letters
- Issued 58 Non-filer letters and 5 Amendment letters

- Processed 29 Form 462
- Responded 8,328 emails from form700@fppc.ca.gov and 439 phones calls
- Re-certified 6 existing local e-filing systems and approved 4 new local e-filing systems

SEI Unit April 2026 Summary

- Referred 0 cases to the Enforcement
- Issued 9 fine letters
- Issued 98 Non-filer letters and 45 Amendment letters
- Processed 156 Form 462
- Responded 4,780 emails from form700@fppc.ca.gov and 486 phones calls
- Re-certified 8 existing local e-filing systems and approved 2 new local e-filing systems

D. Collection/Revenue

July 2025 – April 2026 Report of Collection

Category	Check	Credit Card	FTB Offset	Total
SEI Filing Fee	\$ 37,000	-	-	\$ 37,000
SEI Fine	\$ 4,144	\$ 23,215	\$ 4,695	\$ 32,054
PREP	\$ 250	\$ 13,700	-	\$ 13,950
Enforcement Collection	\$ 900	\$ 1,625	\$ 4,249	\$ 6,774
Enforcement Stipulations	\$ 253,252	\$ 67,962	-	\$ 321,214
Reimbursement	\$ 268,497	-	-	\$ 268,497
Total	\$ 564,043	\$ 106,502	\$ 8,944	\$ 679,489