



MEMORANDUM

To: Chair Silver and Commissioners Brandt, Ortiz, and Wilson

From: Galena West, Executive Director
Kendall L.D. Bonebrake, Chief of Enforcement
Kristin E. Goulet, Commission Counsel

Date: September 28, 2026

RE: **Assignment of Hearing to Administrative Law Judge**

Case Name: In the Matter of Debbie Moser, FPPC No. 24/946

I. INTRODUCTION

Respondent Debbie Moser (“Moser”) is a Governing Board Member for the Weed Union Elementary School District. The Political Reform Act¹ (the “Act”) requires every agency to adopt and promulgate a Conflict of Interest Code for designated employees, including a Governing Board Member of a School District, to disclose their reportable economic interests on a Statement of Economic Interests (“SEI”) at various times pursuant to their agency’s Conflict of Interest Code and the Fair Political Practices Commission’s regulations. Moser, a designated employee, violated the Act by failing to timely file a 2022 Annual SEI by the April 3, 2023 deadline and a 2023 Annual SEI by the April 2, 2024 deadline.

II. COMMISSION ACTION ONLY REQUIRED IF THE COMMISSION DESIRES TO PARTICIPATE IN THE ADMINISTRATIVE HEARING

The Executive Director and the Chief of Enforcement are recommending an administrative law judge (“ALJ”) conduct the hearing pursuant to Government Code Section 11512, subdivision (a). The ALJ will then make a recommendation to the Commission on the findings of fact, law and penalty, if applicable, in the matter. The Commission will then make the final determination on the case.

¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

This memorandum is submitted to each member of the Commission pursuant to California Code of Regulation Section 18361.5, subdivision (b), which provides:

If the Enforcement Division determines that a hearing on the merits should be conducted before an administrative law judge alone pursuant to Government Code section 11512(a), the Enforcement Division shall provide a copy of the accusation as well as a memorandum describing the issues involved to each member of the Commission. If, at the next regularly scheduled meeting, two or more Commissioners indicate a desire to participate in the hearing, the matter will be scheduled for a hearing before the Commission when an administrative law judge is available.

Thus, no Commission action is required if the Commission approves the recommendation that the administrative hearing in this matter should be conducted before an ALJ. However, two or more Commissioners may vote to keep the matter with the Commission if so desired.

III. PROCEDURAL HISTORY

The Enforcement Division initiated this administrative action against Moser by serving Moser with a Report in Support of a Finding of Probable Cause (“PC Report”) on March 15, 2025. Moser did not file a response to the PC Report or request a probable cause conference. By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served (“Ex Parte Request”), dated April 10, 2025, the Enforcement Division submitted the matter to the Hearing Officer, John Feser, for a determination of probable cause. On or about April 11, 2025, the Hearing Officer issued an order finding, based on the Ex Parte Request and the PC Report, that there was probable cause to believe Moser violated the Act and directed the Enforcement Division to issue an Accusation against Moser in accordance with the finding.

On June 6, 2025, the Commission’s Assistant Chief of Enforcement, Angela J. Brereton, issued an Accusation against Moser. Moser was served with the Accusation on June 19, 2025. Moser submitted a signed Notice of Defense dated June 24, 2025, admitting to the Accusation in whole.

IV. HEARING OPTIONS

Every hearing in a contested case must be presided over by an ALJ. The agency itself shall determine whether the ALJ is to hear the case alone or whether the agency itself is to hear the case with the ALJ.²

When the agency itself hears the case, the ALJ shall preside at the hearing, rule on the admission and exclusion of evidence, and advise the agency on matters of law; the agency itself shall exercise all other powers relating to the conduct of the hearing but may delegate any or all of them to the ALJ. When the agency itself hears the case, the agency

² See Gov’t Code § 11512, subd. (a).

shall issue its decision within 100 days of submission of the case.³ When the ALJ hears a case, the judge shall exercise all powers relating to the conduct of the hearing. A rule of the ALJ admitting or excluding evidence is subject to review in the same manner and to the same extent as the ALJ's proposed decision in the proceeding.⁴

If the matter is heard solely by the ALJ, the ALJ will issue a proposed decision for the Commission's consideration within 30 days after the case is submitted.⁵ The agency may adopt the decision in its entirety, reduce or otherwise mitigate the proposed penalty and adopt the balance of the proposed decision, make technical or minor changes, or reject the proposed decision.⁶

V. SUMMARY OF THE ACCUSATION

The Accusation alleges Moser violated the Political Reform Act as follows:

Count 1: Failure to Timely File the 2022 Annual SEI

Moser, as a designated official, had a duty to file the 2022 Annual SEI by the April 3, 2023 due date. Moser filed the 2022 Annual SEI on April 14, 2025. By failing to timely file the 2022 Annual SEI, Moser violated Government Code section 87300.

Count 2: Failure to Timely File the 2023 Annual SEI

Moser, as a designated official, had a duty to file the 2023 Annual SEI by the April 2, 2024 due date. Moser filed the 2023 Annual SEI on April 14, 2025. By failing to timely file the 2023 Annual SEI, Moser violated Government Code section 87300.

VI. CONCLUSION

If, at the next regularly scheduled meeting, two or more Commissioners indicate a desire to participate in the hearing, the matter will be scheduled for a hearing before the Commission when an ALJ is available.⁷ Otherwise, hearing of this matter will be conducted before an ALJ alone pursuant to Section 11512, subdivision (a), and the ALJ's decision would subsequently be brought before the Commission for approval.

³ See Gov't Code § 11517, subd. (b).

⁴ See Gov't Code § 11512, subd. (b).

⁵ See Gov't Code § 11517, subd. (c)(1).

⁶ See Gov't Code § 11517, subd. (c)(2)(A-E).

⁷ Reg. § 18361.5, subd. (b).

1 ANGELA J. BRERETON
Assistant Chief of Enforcement
2 KRISTIN E. GOULET
Commission Counsel

3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q St, Suite 3050
4 Sacramento, CA 95811
Telephone: (279) 237-5986
5 Email: kgoulet@fppc.ca.gov

6 Attorneys for Complainant
Enforcement Division of the Fair Political Practices Commission
7

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

11 In the Matter of:) FPPC Case No. 2024-00946
12)
13)
13 DEBBIE MOSER,) **ACCUSATION**
14)
15 Respondent.) (Gov. Code §11503)
16)
17)

18 Complainant, the Enforcement Division of the Fair Political Practices Commission, after a finding
19 of probable cause pursuant to Government Code Section 83115.5, alleges the following:

20 **JURISDICTION**

21 1. Complainant is the Enforcement Division of the Fair Political Practices Commission (the
22 “Commission”) and makes this Accusation in its official capacity and in the public interest.

23 2. The authority to bring this action is derived from Title 2, California Code of Regulations,
24 Sections 18361 and 18361.4, subdivision (g), and the statutory law of the State of California, specifically
25 including, but not limited to, Government Code Sections 83111, 83116, and 91000.5, which assign to the
26 Enforcement Division the duty to administer, implement, and enforce the provisions of the Political
27 Reform Act, found at Government Code Sections 81000 through 91014.

28 ///

3. When enacting the Political Reform Act (the “Act”),¹ California voters specifically found and declared that previous laws regulating political practices had suffered from inadequate enforcement, and it was their purpose to ensure that the Act be vigorously enforced.²

4. To that end, Section 81003 requires that the Act be liberally construed to achieve its purposes.

5. One of the stated purposes of the Act is to promote transparency by ensuring that assets and income of public officials which may be materially affected by their official actions be disclosed so that conflicts of interests may be avoided.³ Another purpose is to provide adequate enforcement mechanisms so that the Act will be “vigorously enforced.”⁴

RESPONDENTS

6. Respondent Debbie Moser (“Moser”) is a Governing Board Member for the Weed Union Elementary School District. As of the date of this Accusation, Moser continues to hold this position.

APPLICABLE LAW

7. All applicable law in this Accusation is the law as it existed during the relevant time for the violations alleged.

A. Conflict of Interest Codes

8. Regulation 18730 outlines the timing for disclosing the designated employees’ economic interests as follows: all designated employees shall annually file statements no later than April 1.⁵ Any person who violates any provision of the Act is liable for administrative penalties up to \$5,000 per violation.⁶

B. Regulation 18730 and Liability for Violation

9. The Act requires every state and local agency to develop a Conflict of Interest Code.⁷ These codes must designate those officials who participate in making decisions which may foreseeably have a

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations.

² Sections 81001, subd. (h), and 81002, subd. (f).

³ Section 81002, subd. (c).

⁴ Section 81002, subd. (f).

⁵ Regulation 18730, subd. (b)(5)(C).

⁶ Sections 83116 and 83116.5.

⁷ Section 87300.

material financial effect on any financial interest belonging to that official and require those designated officials to disclose all reportable interests on SEIs.⁸ The requirements of an agency's Conflict of Interest Code have the force of law, and any violations of those requirements is deemed a violation of the Act.⁹

C. Duty to Timely File Annual Statements of Economic Interest

10. The Act requires every designated official to annually file a statement disclosing their investments, interests in real property, and income by filing a SEI by April 1 of each year.¹⁰ When April 1 falls on a weekend or holiday, the filing deadline is extended to the next regular business day.¹¹ Failure to comply with the disclosure requirements is a violation of the Act.¹²

D. Siskiyou County's Conflict of Interest Code

11. Weed Union Elementary School District ("Weed UESD") is one of Siskiyou County's school districts and falls under the purview of Siskiyou County. As such, Weed UESD follows the conflict of interest code of Siskiyou County. Governing Board Members for Weed UESD are required to disclose all investments, business positions, interests in real property, and income.¹³

12. Siskiyou County incorporated by reference into its conflict of interest code the provisions of 2 Cal. Code of Regs. Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission.¹⁴

E. Factors to be Considered by the Fair Political Practices Commission

13. In framing a proposed order following a finding of a violation pursuant to Government Code Section 83116, the Commission and the administrative law judge shall consider all the surrounding circumstances including but not limited to the following factors set forth in Regulation 18361.5 subdivision (e)(1) through (8): (1) The extent and gravity of the public harm caused by the specific violation; (2) The level of experience of the violator with the requirements of the Political Reform Act; (3) Penalties previously imposed by the Commission in comparable cases; (4) The presence or absence of any intention to conceal, deceive or mislead; (5) Whether the violation was deliberate,

⁸ Section 87302, subd. (a).

⁹ Section 87300.

¹⁰ Sections 87302, subd. (b); Regulation 18730, subd. (b)(5)(C).

¹¹ Section 81005.

¹² Section 87300.

¹³ Siskiyou County Conflict of Interest Code, Amended September 6, 2022.

¹⁴ Ibid.

negligent or inadvertent; (6) Whether the violator demonstrated good faith by consulting the Commission staff or any other governmental agency in a manner not constituting complete defense under Government Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern and whether the violator has a prior record of violations of the Political Reform Act or similar laws; and (8) Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide full disclosure.¹⁵

GENERAL FACTS

14. Moser is a Governing Board Member for the Weed Union Elementary School District. As of the date of this Accusation, Moser continues to hold this position.

15. Moser failed to timely file a 2022 Annual SEI by the April 3, 2023 deadline.¹⁶

16. Siskiyou County contacted Moser two times in writing on April 14, 2023 and May 15, 2023 to remind her of her obligation to file a 2022 Annual SEI.

17. Moser failed to timely file a 2023 Annual SEI by the April 2, 2024 deadline.¹⁷

18. Siskiyou County contacted Moser two times in writing on April 15, 2024 and May 15, 2024 to remind her of her obligation to file a 2023 Annual SEI.

19. After not receiving compliance, Siskiyou County referred the matter to the Enforcement Division on June 17, 2024.

20. Between September 17, 2024 and January 17, 2025, the Enforcement Division contacted Moser numerous times to gain compliance. Moser never engaged in any of these contact attempts.

21. On July 17, 2024, Moser reached out to the Enforcement Division and notified them she would file her outstanding SEIs.

22. Moser filed her outstanding 2022 Annual and 2023 Annual SEIs on April 14, 2025.

///

///

///

¹⁵ Regulation 18361.5, subdivision (e).

¹⁶ The due date was extended to April 3, 2023 because April 1, 2024 fell on a Saturday, and the due date had to be extended to the next regular business day.

¹⁷ The due date was extended to April 2, 2024 because April 1, 2024 was a state holiday (Cesar Chavez Day, observed), and the due date had to be extended to the next regular business day.

1 **PROCEDURAL HISTORY**

2 23. The Enforcement Division initiated an administrative action against Moser in this matter
3 by serving a packet containing a cover letter, a Report in Support of a Finding of Probable Cause (“PC
4 Report”), a fact sheet regarding probable cause proceedings, selected sections of the Government Code
5 regarding probable cause proceedings for the Commission, and selected regulations of the Commission
6 regarding probable cause proceedings.

7 24. Moser was mailed the PC Report via certified mail on March 11, 2025 and it was delivered
8 to Moser on March 15, 2025.¹⁸ The information contained in the PC Report packet advised Moser that she
9 had 21 days in which to request a probable cause conference, file a written response to the PC Report, or
10 both. During the 21 days that followed service of the PC Report, Moser did not file a response to the PC
11 Report or request a probable cause conference.

12 25. By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an
13 Accusation Be Prepared and Served (“Ex Parte Request”), dated April 10, 2025, the Enforcement Division
14 submitted the matter to the Hearing Officer for a determination of probable cause.

15 26. On or about April 14, 2025, the Hearing Officer issued an order finding, based on the Ex
16 Parte Request and the PC Report, that there was probable cause to believe Moser violated the Act and
17 directed the Enforcement Division to issue an Accusation against Moser in accordance with the finding.

18 **VIOLATIONS**

19 27. Moser committed 2 violations of the Act as follows:

20
21 **Count 1**

22 **Failure to Timely File a 2022 Annual SEI**

23 28. Complainant incorporates paragraphs 1–27 of this Accusation, as though completely set
24 forth herein.

25 29. Moser, as a designated official, had a duty under the Act to file a 2022 Annual SEI April
26 3, 2023.

27 30. Moser failed to timely file her 2022 Annual SEI by the April 3, 2023 due date.

28

¹⁸ Section 83115.5.

31. By failing to file her 2022 Annual SEI by the April 3, 2023 deadline, Moser violated Government Code section 87300.

Count 2

Failure to Timely File a 2023 Annual SEI

32. Complainant incorporates paragraphs 1–27 of this Accusation, as though completely set forth herein.

33. Moser, as a designated official, had a duty under the Act to file a 2023 Annual SEI by April 2, 2024.

34. Moser failed to timely file her 2023 Annual SEI by the April 2, 2024 due date.

35. By failing to file her 2023 Annual SEI by the April 2, 2024 deadline, Moser violated Government Code section 87300.

MITIGATING OR EXCULPATORY FACTORS

36. The Enforcement Division is not aware of mitigating or exculpatory factors.

AGGRAVATING FACTORS AND OTHER RELEVANT MATERIALS

37. Moser is aware of her filing obligations due to her position as Governing Board Member for Weed UESD as she has regularly filed her SEIs from 2018 through 2022.

PRAYER

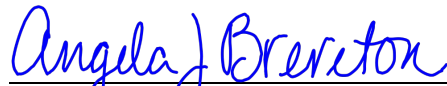
WHEREFORE, Complainant prays as follows:

1. That the Fair Political Practices Commission hold a hearing pursuant to Section 83116 and Regulation 18361.5, and at such hearing find that Moser violated the Act as alleged herein;
2. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (b), order Moser to file the 2022 Annual SEI, and pursuant to Section 83116, subdivision (c), order Moser to pay a monetary penalty of up to \$5,000 for the violation of the Political Reform Act alleged in **Count 1**;
3. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (b), order Moser to file the 2023 Annual SEI, and pursuant to Section 83116, subdivision (c), order Moser to pay a monetary penalty of up to \$5,000 for the violation of the Political Reform Act alleged in **Count 2**;

- 1 4. That the Fair Policial Practices Commission, pursuant to Regulation 18361.5, subdivision
2 (e), consider the following factors in framing a proposed order following a finding of a
3 violation pursuant to Section 83116: (1) The extent and gravity of the public harm caused
4 by the specific violation; (2) The level of experience of the violator with the requirements
5 of the Political Reform Act; (3) Penalties previously imposed by the Commission in
6 comparable cases; (4) The presence or absence of any intention to conceal, deceive or
7 mislead; (5) Whether the violation was deliberate, negligent or inadvertent; (6) Whether the
8 violator demonstrated good faith by consulting the Commission staff or any other
9 governmental agency in a manner not constituting complete defense under Government
10 Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern and
11 whether the violator has a prior record of violations of the Political Reform Act or similar
12 laws; and (8) Whether the violator, upon learning of a reporting violation, voluntarily filed
13 amendments to provide full disclosure.
- 14 5. That the Fair Political Practices Commission grant such other and further relief as it deems
15 just and proper.

16

17 Dated: June 6, 2025



Angela J. Breton, Assistant Chief of
Enforcement
Fair Political Practices Commission