



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811

August 16, 2022

Big Independent Cities Excess Pool JPA
Attn: Rob Kramer
[REDACTED]

Warning Letter: FPPC No. 2022-00570 – Big Independent Cities Excess Pool JPA

Dear Authority and Mr. Kramer:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to a referral from the Commission’s Legal Division regarding the Authority’s failure to submit a completed 2020 biennial notice to reflect whether or not the agency’s Conflict of Interest Code is current and accurate.

The Act requires multi-county agencies to review their Conflict of Interest Codes *each even-numbered year* and, if an agency determines that amendments are necessary due to changed circumstances, an amended Conflict of Interest Code must be submitted to the Commission. If no change is required, the agency head must submit a written statement to that effect to the Commission no later than October 1 of the same year.²

Your actions violated the Act because you failed to timely submit your agency’s 2020 Biennial Notice to the Commission by the October 1, 2020 deadline. However, since you submitted the Authority’s 2020 Biennial Notice after you were contacted by the Enforcement Division, and you have no prior history of violating the Act, the Enforcement Division has decided to close this matter with this warning letter.

This letter serves as a written warning. The information in this matter will be retained and may be considered should an enforcement action become necessary based on newly discovered information or future conduct. Failure to comply with the provisions of the Act in the future will result in monetary penalties of up to \$5,000 for each violation.

A warning letter is an Enforcement Division case resolution without administrative prosecution or fine. The Commission has adopted Regulation 18360.1 to authorize the Enforcement Division to issue warning letters to conclude cases in specified circumstances. However, the warning letter resolution does not provide you with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Commission. If you wish to avail yourself of these proceedings by requesting that your case proceed with prosecution rather than a warning, please notify us within ten (10) days from the date of this letter. Upon this notification, the Enforcement Division will rescind

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Section 87306.5.

this warning letter and proceed with administrative prosecution of this case. If we do not receive such notification, this warning letter will be posted on the Commission's website ten (10) days from the date of this letter.

If you have any questions regarding this letter, please contact Amber Rodriguez at (916) 322-1198 or arodriguez@fppc.ca.gov.

Sincerely,

Angela J. Brereton

Angela J. Brereton, Chief
Enforcement Division

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