



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

December 17, 2021

Ms. Maria Grijalva
Maria Grijalva for City Council 2016
[REDACTED]

Warning Letter re: FPPC Case No. 19/8; Maria Grijalva for City Council 2016; Maria Grijalva

Dear Ms. Grijalva:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act.¹ This matter arises from a non-sworn complaint/referral that we received from the Yolo County District Attorney's Office in October 2018. After conducting our own investigation, we are closing this case with this warning letter.

At the core of the Act's campaign reporting system is the requirement that candidates and their controlled committees must file campaign statements and reports for certain reporting periods and by certain deadlines. For example, a candidate and her controlled committee must file two semi-annual campaign statements each year. Generally, the first is for the reporting period of January 1 through June 30—and this statement must be filed by the deadline of July 31. The second is for the reporting period of July 1 through December 31—and this statement must be filed by January 31.² Among other things, such campaign filings are required to include itemized and accurate information about campaign expenditures of \$100 or more.³

In 2016, you were a candidate for West Sacramento City Council in the election held on November 8. Your controlled committee for this election was Maria Grijalva for City Council 2016, and you acted as your own treasurer. Our investigation found various, minor filing/reporting violations and a violation that involved failure to use a single committee bank account. However, the statute of limitations has passed for these, except for what is noted below.

For the period ending December 31, 2016, a semi-annual campaign statement was required to be filed by the deadline of January 31, 2017, but the campaign statement was filed about 55 days late. On Schedule E of this filing, the amount reported as paid to the News Ledger was under-stated by \$110. (It was reported as \$100, but should have been \$210.) In this way, you and the committee violated Sections 84200, subdivision (a); and 84211, subdivision (k).

However, you lost the election. The committee raised and spent less than \$19,000 in 2016, most of which was your own money. There was only a small amount of reportable activity for the final semi-annual reporting period in 2016, and the amount under-stated on Schedule E was *de minimis*. Additionally, the committee has terminated (effective as of the end of 2016).

¹ The Political Reform Act—sometimes simply referred to as the Act—is contained in Government Code sections 81000 through 91014. Unless otherwise noted, all statutory references are to the Government Code—as it was in effect at the time of the violations in this case.

² See Section 84200.

³ Section 84211, subdivision (k).

We are closing this matter without further action. 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 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 need guidance regarding your obligations in the future, please visit our website at www.fppc.ca.gov/advice.html or call the Commission's Toll-Free Advice Line at 1-866-ASK-FPPC (1-866-275-3772).

Thank you for your attention to this matter. Please do not hesitate to call if you have any questions.

Very truly yours,

Neal P. Bucknell

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