



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

April 19, 2022

County of Sonoma
Attn: Linda Schlitgen
Via email: Linda.Schlitgen@sonoma-county.org

Re: Warning Letter; FPPC No. 2022-00145; County of Sonoma

Dear Ms. Schlitgen:

The Enforcement Division of the Fair Political Practices Commission (“FPPC”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to the County’s self-reported violations, as well as three sworn complaints, regarding the filing officer duties as they relate to Statements of Economic Interests (“SEIs”).

The Act imposes specific duties upon filing officers and filing officials who receive SEIs.² A filing *officer* receives and retains SEIs, while a filing *official* receives SEIs and forwards the originals to the filing officer. In this matter, the County of Sonoma acts as both a filing officer and a filing official.

Regulation 18115 requires filing officers to supply SEIs to designated employees and public officials who have assuming, annual, and leaving office filing obligations and to determine whether the proper statements have been filed. Filing officers must promptly notify a designated employee or public official who has not filed a required statement. After making at least two attempts to attain compliance, filing officers must report any apparent violation of the Act to the appropriate agencies (i.e., the FPPC’s Enforcement Division). Filing officers are also required to compile and maintain current lists of all statements required to be filed with the agency and all those actually filed with the agency. Regulation 18115.1 requires a filing official to indicate the date of the agency’s receipt of the statement on the statement’s cover page.

The County of Sonoma violated the Act by failing to supply SEIs to some designated employees and public officials who assumed and left office, failing to determine whether the proper statements were filed for some designated employees and public officials; failing to promptly notify some designated employees and public officials who did not file required statements, failing to report apparent violations of the Act to the appropriate agencies, and failing to include the date received on all SEIs received. However, for the following reasons, the Enforcement Division has decided to close this case with this warning letter rather than a fine: You self-reported the violations to the Enforcement Division upon realizing the filing officer duties were not being performed correctly; the County has had a significant amount of turnover since the FPPC’s Education team

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 18109 through 18997 of Title 2 of the California Code of Regulations.

² Section 81010; Regulations 18115, 18115.1, and 18115.2.

provided training previously in 2017-2018; the County has since held several in-house trainings regarding the SEIs; the County requested and received training in March 2022 from the FPPC's Education team regarding filing officer duties as they pertain to SEIs; the County is in the process of notifying all employees who were not previously notified of their filing obligations; and the County of Sonoma has no prior history of violating the Act.

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.

Please feel free to contact Tara Stock at tstock@fppc.ca.gov with any questions you may have regarding this letter.

Sincerely,

Angela J. Brereton

Angela J. Brereton, Chief
Enforcement Division

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