



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

December 29, 2022

Sent via Email: tomh@bmhlaw.com

Thomas W. Hiltachk
Bell, McAndrewa & Hiltachk, LLP
O/B/O Robert Cendejas

RE: Closure Letter: FPPC Case No. 2020/00480; In the Matter of Robert Cendejas

Dear Thomas Hiltachk:

The Enforcement Division of the California Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act (the “Act”)¹ and has limited jurisdiction under Government Code Section 1090 *et seq.* (“Section 1090”).² This letter is in response to our investigation concerning a Commission Initiated investigation in connection with the above referenced case, investigating if your client Robert Cendejas violated Section 1090 when entering into a contract in 2018 with the City of Dinuba to provide specialized tax services to online businesses on a contingency basis that Cendejas agreed to recruit to the City of Dinuba.

After a full investigation, the Enforcement Division determined that Cendejas, in the capacity as a tax consultant for the City of Dinuba for online businesses, did not negotiate in Cendejas’ public capacity and only had an expectation of income after online businesses were recruited to the City of Dinuba, which did not occur. As such, the Enforcement Division has determined there is insufficient evidence to prove a violation under Section 1090 and we are closing this matter without further action.

Regarding this determination, for purposes of Section 1090, we are required to advise you that this “decision applies only to proceedings brought by the Commission.”³

Should you have any questions regarding this letter, please feel free to contact me at (916) 324-8787 or bcastillo@fppc.ca.gov.

Sincerely,
Bridgette Castillo

Bridgette Castillo
Senior Commission Counsel
Enforcement Division

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 All further statutory references are to the Government Code unless otherwise indicated.

³ Section 1097.1, subdivision (d).