



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street, Suite 3050, Sacramento, CA 95811

September 8, 2023

Johnny Rodriguez  
Former City Council Member, City of Brentwood  
[REDACTED]

**Warning Letter re: FPPC No. 2022-00322, Johnny Rodriguez**

Dear Johnny Rodriguez:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act<sup>1</sup> (the “Act”). As you are aware, the Enforcement Division received an anonymous complaint alleging that you failed to disclose certain reportable economic interests on your Statements of Economic Interests (“SEIs”). The Enforcement Division has completed its review and found that you failed to timely disclose your source of income and your spouse’s source of income on your Assuming Office, 2019 Annual, and 2020 Annual SEIs.

Government Code Section 87200 of the Act requires certain public officials to file SEIs at specified times to disclose their reportable economic interests. Individuals holding positions specified in Section 87200, such as City Council Members, must file a SEI within 30 days of assuming office, annually thereafter by April 1, and within 30 days of leaving office.<sup>2</sup> The SEI must include investments, interests in real property, and income received during the period covered by the SEI.<sup>3</sup>

You violated the Act by failing to timely disclose your source of income, ODAT, and your spouse’s source of income, Sunshine House, on your Assuming Office, 2019, and 2020 Annual SEIs. However, you filed amendments to the applicable SEIs to disclose the sources of income after you were contacted by the Enforcement Division, you no longer serve as a City Council Member, you have filed all required SEIs, and you have no prior history of violating the Act. Based on the foregoing, and in accordance with the Enforcement Division Policy Directives formally adopted by the Commission on January 26, 2023, which requires the Enforcement Division to take all appropriate actions within their discretion to decrease the Division’s annual carryover caseload, the Enforcement Division is closing this case without further action.<sup>4</sup> Discretion was used based upon

---

<sup>1</sup> 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.

<sup>2</sup> Sections 87202, 87203, and 87204; Regulation 18723.

<sup>3</sup> Sections 87202, 87203, and 87204.

<sup>4</sup> <https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/AgendaDocuments/General%20Items/2023/january/15.0-Enforcement-directives.pdf>

mitigating or aggravating circumstances and the totality of the circumstances.<sup>5</sup> Additionally, discretion was used for violations that caused minimal public harm when lack of experience or knowledge of the Act's requirements caused multiple violations with minimal public harm that were corrected upon contact.<sup>6</sup> This resolution may not be used as a comparable case for other enforcement matters.<sup>7</sup>

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 have questions regarding this letter, please contact Tara Stock at (916) 322-8241 or [tstock@fppc.ca.gov](mailto:tstock@fppc.ca.gov).

Sincerely,

*James M. Lindsay*

James M. Lindsay, Chief  
Enforcement Division

JML:ts

---

<sup>5</sup> Regulation 18360.1.

<sup>6</sup> Regulation 18360.2.

<sup>7</sup> See Regulation 18361.5, subdivision (e)(3)..