



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

October 13, 2022

Shannon Leslie
[REDACTED]

**Re: Warning Letter
FPPC No. 2019-1336; Shannon Leslie**

Dear Shannon Leslie:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act").¹ This letter is sent in response to referrals received from the filing officers for the Ventura County Executive Office ("Executive Office"). The Enforcement Division has completed its review of the matter and found that as a result of your position as Senior Deputy Executive Officer with the Executive Office, the Act required you to periodically file several different Statements of Economic Interests ("SEI").

Section 87300 of the Act requires every state and local agency to develop a Conflict of Interest Code. This Code requires individuals who participate in making decisions which may foreseeably have a material financial effect on any financial interest belonging to that person to disclose all reportable interests on SEIs.² Individuals required to file SEIs must file within 30 days of assuming office, annually thereafter at the time specified by the Code, and within 30 days of leaving office.³

As a designated employee, you were obligated to file multiple SEIs as an official appointed to a designated position listed on the Executive Office Conflict of Interest Code.

You violated the Act by failing to timely file your 2017 Annual SEI, 2018 Annual SEI, 2019 Annual SEI, 2020 Annual SEI, and 2021 Annual SEI by their respective deadlines. However, the Enforcement Division has decided to issue a warning letter instead of seeking a monetary penalty in this case. Our investigation revealed evidence that you suffered illness and incapacity rendering you otherwise unable to perform your official duties, including fulfilling your filing obligations, during the relevant reporting periods.

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

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 87302, subd. (b).

³ *Ibid.*

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.

Although the Enforcement Division is closing this case without seeking a penalty, you are still required to file all outstanding SEIs (i.e., your 2021 annual SEI) and pay any late filing fees assessed by your filing officer. Please contact your filing officer, Rosa Gonzalez, at rosa.gonzalez@ventura.org or (805) 654-2533, for further information about your required filings. Any future non-filings may result in monetary penalties and this warning letter may be considered in any future enforcement actions.

If you have any questions regarding this letter, please contact me by e-mail at DCastro@fppc.ca.gov or by phone at (916) 322-7050.

Sincerely,

David E. Castro

David E. Castro
Commission Counsel, Enforcement Division