



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

March 28, 2023

Aja Brown
[REDACTED]

Warning Letter (FPPC Case Nos. 2019-00249 and 2022-00233) re: Aja Brown

Dear Aja Brown:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act.¹ The cases noted above arise from two staff/filing officer referrals and one anonymous complaint, which raised concerns about certain parts of the Act, including filing/reporting requirements for statements of economic interests—as well as the Act’s prohibition against receiving honoraria payments.

Regarding the honoraria issues (and related reporting issues) we are closing this matter without further action. Regarding the non-filing and late filing of certain statements of economic interests, we are closing this matter with this warning letter, as discussed below.

Various elected and appointed officials, including city councilmembers (as well as public officials who manage public investments) must file [Form 700](#) statements of economic interests (“SEI” filings) on an annual basis. Generally, these must be filed each year by April 1, for the period covering January 1 through December 31 of the prior year. For an official who holds multiple positions, an expanded statement may be filed for all positions held. Similar statements must be filed within 30 days of leaving office. Additionally, for any person who holds a designated position with an agency that has adopted a Conflict of Interest Code, similar filing requirements apply. (See Sections 87200, *et seq.* Also, see Regulations 18723 and 18723.1.)

From 2017 through 2021, you held various positions for which you were required to file these SEI statements, but you failed to do so, as noted below.²

As the Mayor of Compton, you failed to file an annual SEI for calendar year 2017, and your annual SEI for 2018 was filed about 106 days late—in violation of Section 87203.

As a board member of the Gateway Cities Council of Governments, your annual SEI for calendar year 2017 was filed about 45 days late, and you failed to file a leaving office SEI within 30 days of leaving your position—in violation of Section 87300.

¹ The Political Reform Act—sometimes simply referred to as the Act—is contained in Government Code sections 81000 through 91014. The regulations of the Fair Political Practices Commission are contained in California Code of Regulations, title 2, sections 18110 through 18998. Unless otherwise noted, all statutory references are to the Government Code, and all regulatory references are to Title 2, Division 6 of the California Code of Regulations—as they were in effect during calendar year 2018 (at the time of the violations in this case).

² This warning letter applies to your SEI filing violations that occurred within the past five years. The oldest of these violations involve failure to timely file annual SEI statements for calendar year 2017 by the due date of April 2, 2018—for which the five-year statute of limitations started to run on April 3, 2018 (the first day that such filings were late). See Section 91000.5.

As director of Los Angeles County Sanitation Districts 1, 2, and 8, you failed to file annual SEI statements for calendar years 2017 through 2020—and when you left the position in June 2021, you failed to file a leaving office SEI within 30 days—in violation of Sections 87203 and 87204.

Also, when you left your position as a board member of the Independent Cities Finance Authority in July 2021, you failed to file a leaving office SEI within 30 days—in violation of Section 87204.

In mitigation, you no longer hold any of these positions, and as detailed above, some of the statements ultimately were filed, albeit late. Additionally, except as noted above, your annual SEI filings for 2019 and 2020 for multiple positions were timely filed. Based on the foregoing, and in accordance with the Enforcement Division Policy Directives formally adopted by the Commission on January 26, 2023, which require the Enforcement Division to take all appropriate actions within its discretion to decrease the Division's annual carryover caseload, the Enforcement Division is closing this case with this warning letter.³ Discretion was used based upon mitigating or aggravating circumstances and the totality of the circumstances.⁴ This resolution may not be used as a comparable case for other enforcement matters.⁵

Although the Enforcement Division is closing this case without seeking a penalty, you are still required to file all outstanding SEIs and pay any late filing fees assessed by your filing officer. Please contact your filing officer at Form700@fppc.ca.gov 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.

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).

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³ <https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/AgendaDocuments/General%20Items/2023/january/15.0-Enforcement-directives.pdf>

⁴ Regulations 18360.1 and 18360.3.

⁵ See Regulation 18361.5, subdivision (e)(3).

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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