



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

May 10, 2023

John Broghammer
o/b/o Scott Friend
Via email: john@sims-law.net

No Action Closure Letter re: FPPC No. 2021-00686; Scott Friend

Dear John Broghammer:

The Enforcement Division of the Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to a sworn complaint alleging that your client, Scott Friend, failed to disclose certain economic interests on their Statements of Economic Interests (“SEIs”) for their position as a Consultant with the City of Orland. The sworn complaint also alleged that your client entered into a contract for CEQA documentation on behalf of the City of Orland in violation of the Act’s conflicts of interests provisions.

PREP Course Completion

The Enforcement Division found that Scott Friend successfully completed the Commission’s Political Reform Education Program (PREP) course regarding SEIs. In addition, they have filed amendments to the applicable SEIs to disclose the reportable economic interests. For these reasons, we are closing this matter without further action.

Conflicts of Interests Allegations

While the Enforcement Division’s investigation confirmed contracts between ECORP and the City of Orland, there is insufficient evidence at this time to establish that your client violated the Act’s conflicts of interests provisions related to these contracts. 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.² Discretion was used based upon mitigating or aggravating circumstances and the totality of the circumstances.³ This resolution may not be used as a comparable case for other enforcement matters.⁴

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

³ Regulations 18360.1 and 18360.3.

⁴ See Regulation 18361.5, subdivision (e)(3).

If you have any questions regarding this letter, please contact Angela Brereton at abrereton@fppc.ca.gov or (916) 322-5771.

Sincerely,

Angela J Brereton

Angela J Brereton, Assistant Chief
Enforcement Division

AJB:ts

cc: Paul Farsai, sworn complainant