



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

July 10, 2023

Ashlee Titus
o/b/o Steve Bernal
Via Email: atitus@bmhlaw.com

No Action Closure Letter Re: FPPC No. 2020-01085; Steve Bernal

Dear Steve Bernal:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to a sworn complaint submitted that alleged Steve Bernal received an unlawful gift from W.B. Lindley in the form of lodging. After conducting our investigation and review of the case, we are closing this matter without further action as there is insufficient evidence to support a finding that you violated the Act.

The Enforcement Division’s investigation did not obtain sufficient evidence to determine whether the lodging was a reportable gift under the Act. Therefore, in conjunction 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 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

Should you have any questions regarding this letter, please feel free to contact me at 916-327-6358 or arose@fppc.ca.gov.

Sincerely,

Alex J. Rose

Alex J. Rose,
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 <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).