



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

January 24, 2024

Jeannine Pearce
[REDACTED]

Warning Letter Re: FPPC No. 2019-01229; Jeannine Pearce

Dear Jeannine Pearce:

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 alleging violations of the conflict of interests and economic interests disclosure provisions of the Act, and two filing officer referrals alleging failure to timely file Statements of Economic Interests (“SEI”).

The Enforcement Division has completed its investigation and review of the matter. The Enforcement Division found insufficient evidence to establish a violation of the conflict of interests provisions of the Act, and is therefore taking no further action regarding those allegations.

Additionally, the Enforcement Division found that as a result of your position as a member of the Long Beach City Council and as a member of the Southern CA Association of Governments (“SCAG”), the Act required you to periodically file SEIs disclosing specified interests. The Enforcement Division found that you failed to timely disclose sources of income in your 2018 Annual SEI as a member of the Long Beach City Council, and you failed to timely file your 2019 Annual SEI and Leaving Office SEI as a member of SCAG.

Section 87200 of the Act requires certain public officials to disclose specified reportable interests, including sources of income.² Every person enumerated within Section 87200 must file an SEI within 30 days of assuming office, annually thereafter at the time specified by Commission regulations, and within 30 days of leaving office.

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 Sections 87200 and 87207.

Your actions violated the Act by failing to timely disclose sources of income in your 2018 Annual SEI as a member of the Long Beach City Council, and by failing to timely file your 2019 Annual SEI and Leaving Office SEI as a member of SCAG. The Enforcement Division has determined that mitigating circumstances exist here: the 2018 Annual SEI was amended before the complaint was filed in this case and before Enforcement contact to include the missing sources of income, you are no longer in this position, and you do not have an enforcement history. 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 with this warning letter.³ Discretion was used based upon mitigating or aggravating circumstances and the totality of the circumstances.⁴ 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 after contact.⁵ This resolution may not be used as a comparable case for other enforcement matters.⁶

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.

Although the Enforcement Division is closing this case without seeking a penalty, you are still responsible for paying any late filing fees assessed by your filing officer. Please contact your filing officer, Cyndi Glaser, at cglaser@fppc.ca.gov for further information. Please note that any future non-filings will be brought to our attention and may result in monetary penalties. This warning letter may be considered should a future enforcement action become necessary.

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

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

⁴ Regulation 18360.1.

⁵ Regulation 18360.2.

⁶ See Regulation 18361.5, subdivision (e)(3).

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 forms or a manual, or guidance regarding your obligations, please visit our website at www.fppc.ca.gov. Please feel free to contact me at abreron@fppc.ca.gov or (916) 322-5771 (voicemail) with any questions you may have regarding this letter.

Sincerely,

Angela J Brereton

Angela J. Brereton,
Assistant Chief, Enforcement Division