



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

April 8, 2024

Michael Martello
[REDACTED]
[REDACTED]

[REDACTED]

Re: No Action Closure Letter FPPC Case No. 2022-693; Michael Martello

Dear Mr. Martello:

The Enforcement Division of the Fair Political Practices Commission (“FPPC”) enforces the provisions of the Political Reform Act¹ (the “Act”).

This case arises from an FPPC initiated complaint alleging that you received gifts (membership) from the Pauma Valley Country Club (“PVCC”), which were either not reported on your applicable Form 700’s, and that may have also been over the allowable gift limits which apply to officials. The purpose of our investigation was to determine whether there was a gift of membership by the PVCC provided to you, and if so, if it was over the applicable gift limits. Our investigation found that you fully paid for your membership to the PVCC during 2022, and there was no other evidence of gifts accepted that either required reporting or would have been over the applicable gift limit.

Specifically, no evidence was found to substantiate that you failed to disclose on your Assuming Office or Leaving Office Form 700 from 2022 any gift from the PVCC. Therefore, there is no violation of Government Code Section 89503’s gift limit and there was no gift from the PVCC that required reporting by you as a Government Code Section 87200 full-disclosure designated filer.

Based on the foregoing, this case is being closed with no further action.

Thank you for your attention to this matter. If you have any questions regarding this letter, please contact me at 279-237-3760 or aberjikly@fppc.ca.gov.

Sincerely,

Artin Berjikly

Artin Berjikly, Senior 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 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.