



November 15, 2024

Patricia Soung

Sent via email: [REDACTED]

Warning Letter re: FPPC No. 2022-00767; Patricia Soung

Dear Patricia Soung:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ As you are aware, the Enforcement Division received an anonymous complaint alleging that you, as a Council Member for the Juvenile Justice Coordinating Council (“JJCC”), violated the Act’s conflict of interest provisions.

The Enforcement Division has completed its investigation and review of the facts in this case. Specifically, we determined there is insufficient evidence to support a finding that you violated the Act’s conflict of interest provisions. However, investigation confirmed that you failed to timely disclose income received from W. Haywood Burns Institute (“Burns Institute”) on the 2020 and 2021 Annual Statements of Economic Interests (“SEIs”) and underreported income received from Burns Institute on the 2022 Annual and Leaving Office SEIs. Additionally, the Enforcement Division found that you failed to timely file your 2021 Annual SEI, by the April 1, 2022 due date, and your Leaving Office SEI, by the March 11, 2024 due date.

The Act requires designated employees to periodically file SEIs disclosing specific economic interests as required in the agency’s Conflict of Interest Code.² Annual SEIs are required to be filed by no later than April 1 of each year and Leaving Office SEIs are required to be filed within 30 days after leaving office.³ The applicable JJCC Conflict of Interest Code identified Council Members as a position required to disclose, among other interests, income received from for-profit businesses, nonprofit entities, and persons that provide the type of services utilized by the JJCC or that are eligible to receive grant funding from the JJCC.⁴

Your actions violated the Act because you failed to timely disclose income on certain SEIs and failed to timely file certain SEIs, by the applicable due dates, as discussed above. However,

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.

² Section 87300.

³ JJCC Conflict of Interest Code and Regulation 18730, subd. (b)(5), incorporated by reference.

⁴ JJCC Conflict of Interest Code.

there are several mitigating factors present in this case. You are no longer in your position as a Council Member for the JJCC, you cooperated with the Enforcement Division's investigation, after receiving contact from the Enforcement Division you filed amendments to properly disclose the income received from Burns Institute, your 2021 Annual SEI was filed 3 days late and prior to Enforcement contact, your Leaving Office SEI was filed 37 days late and prior to Enforcement contact, your violations resulted in minimal public harm, and you do not have a prior enforcement history.

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.

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 Regulations 18360.1 and 18360.2 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 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 10 days from the date of this letter.

If you have any questions regarding this letter, please contact me at JRinehart@fppc.ca.gov or (279) 237-5910.

Sincerely,

Jenna Rinehart

Jenna C. Rinehart
Senior Commission Counsel
Enforcement Division