



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

December 20, 2024

Connie M. Leyva
[REDACTED]

No Action Closure Letter re: FPPC Case No. 2021-00476; Connie Leyva

Dear Connie Leyva:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act.¹ This case arises from referrals regarding failure to timely file five Form 803 behested payment reports that were filed from 64 to 89 days late—with respect to behested payments made to Women in CA Leadership (ranging in amounts from \$10,000 to \$35,000).

The reports were required to be filed in April 2020, but were not filed until July 29, 2020. However, in mitigation, this was during the COVID-19 pandemic, and you filed the reports before being contacted by the Enforcement Division. Also, you do not have a history of prior, similar late filings—and the late filings appear to have been the result of inadvertence or negligence.

Based on the foregoing, and in accordance with the Enforcement Division Policy Directives formally adopted by the Commission on January 26, 2023, which require the Enforcement Division to take all appropriate actions within its 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

Thank you for your attention to this matter. Do not hesitate to call if you have any questions.

Very truly yours,

Neal P. Bucknell

Neal P. Bucknell
Senior Commission Counsel
Enforcement Division
nbucknell@fppc.ca.gov
(279) 237-5938

¹ The Political Reform Act—sometimes simply referred to as the Act—is contained in Government Code sections 81000 through 91014. The regulations of the Fair Political Practices Commission are contained in California Code of Regulations, title 2, sections 18104 through 18998.

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).