



May 23, 2024

Grable Ramirez

Via email: [REDACTED]

Warning Letter: FPPC No. 2023-00754; Grable Ramirez

Dear Grable Ramirez,

The Enforcement Division of the Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act (the “Act”).¹ The Enforcement Division found that as a result of your position as a Construction Inspector with the Santa Clara Valley Transportation Authority, the Act required you to file Statement of Economic Interests (“SEIs”) upon leaving your position and you failed to timely file your Leaving Office SEI.

Section 87300 of the Act requires every state and local agency to develop a Conflict of Interest Code. This Code requires individuals who participate in making decisions which may foreseeably have a material financial effect on any financial interest belonging to that person to disclose all reportable interests on SEIs.² Individuals required to file SEIs must file within 30 days of assuming office, annually thereafter at the time specified by the Code, and within 30 days of leaving office.³

You violated the Act by failing to file your Leaving Office SEI by the required deadline. However, because you are no longer in this position, have no prior Enforcement history, and have filed your previously required SEIs timely, the Enforcement Division has decided to close your case with this warning letter.

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 required to pay any late filing fees assessed by your filing officer. Please contact your filing officer, Michelle Oblena at michelle.oblena@vta.org, for further information about your required filings.

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 87302, subd. (b).

³ *Ibid.*

Any future non-filings may result in monetary penalties and this warning letter may be considered in any future enforcement actions.

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 yourselves of these proceedings by requesting that this case proceed with prosecution rather than a warning, please notify us within ten (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 ten (10) days from the date of this letter.

If you have any questions regarding this letter, please contact me at (279) 237-5974 or LColumbel@fppc.ca.gov

Sincerely,

Laura Columbel

Laura Columbel
Commission Counsel
Enforcement Division