



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

April 25, 2024

Lauren Layne
Baker Manock & Jensen, PC
o/b/o Eric Borba
Via Email: llayne@bakermanock.com

No Action Closure Letter Re: FPPC No. 2020-00076; Eric Borba

Dear Lauren Layne:

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 our investigation concerning a sworn complaint in connection with the above referenced case, alleging your client, in their capacity as a Director of the Eastern Tule Groundwater Sustainability Agency (“ETGSA”), violated the Act’s conflict of interest provisions. After conducting our investigation and review of the case, we are closing this matter as to this allegation because there is insufficient evidence to support a finding that your client violated the Act’s conflict of interest provisions.²

Our investigation determined ETGSA must submit any Groundwater Sustainability Plan (“GSP”) to the Department of Water Resources for review and approval. Since the adoption of ETGSA’s GSP is contingent on receiving approval from the Department of Water Resources, there is insufficient evidence to support a finding that it was reasonably foreseeable that the submission of the GSP to the Department of Water Resources would have a financial effect on your client’s financial interests. For this reason, we are closing this allegation without further action.

Even though we are closing our file on this matter, please be advised of the conflict of interest provisions of the Act in any future actions you may take in your capacity as a public official. If you have questions at a later date, please visit our website at <http://www.fppc.ca.gov/advice.html>.

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.

² On April 25, 2024, a streamline stipulation was approved for 54 counts of failing to timely disclose certain reportable interests on the 2018, 2019, 2020, and 2021 Annual SEIs.

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

Sincerely,

Jenna Rinehart

Jenna C. Rinehart,
Senior Commission Counsel
Enforcement Division

cc: Bill Samarin wjsamarin@gmail.com