



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

July 25, 2025

Lori Frugoli  
District Attorney, County of Marin  
Via email: [lori.frugoli@marincounty.gov](mailto:lori.frugoli@marincounty.gov)

**Warning Letter re: FPPC No. 2025-00858; Lori Frugoli**

Dear Lori Frugoli:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).<sup>1</sup> As you are aware, the Enforcement Division received a referral from the Commission’s Statement of Economic Interests (“SEI”) unit alleging that you violated the Act’s gift limit provisions.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that on Schedule D of your 2024 Annual SEI, you disclosed that you received a gift in excess of the annual gift limits imposed by the Act in Section 89503.

The Act prohibits certain public officials from accepting gifts valued at more than the calendar year gift limit from a single source.<sup>2</sup> The term “gift” is defined as “any payment that confers a personal benefit on the recipient, to the extent that consideration of equal or greater value is not received.”<sup>3</sup> As the District Attorney for the County of Marin, you were prohibited from accepting a gift(s) from any single source in any calendar year with a total value of more than the gift limit. The gift limit for the calendar year 2024 was \$590.<sup>4</sup> According to Schedule D of your 2024 Annual SEI, you received from an individual a gift of a discounted trip valued at \$700.

You violated the Act by receiving a gift over the limit from a single source for the calendar year of 2024. However, for the following reasons, the Enforcement Division has decided to close this case with this warning letter rather than a fine: You reimbursed the donor of the gift for the amount over the gift limit; you have since filed an amendment to your 2024 Annual SEI to disclose that you paid down the gift; and you have no 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.

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<sup>1</sup> 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.

<sup>2</sup> Section 89503.

<sup>3</sup> Section 82028(a).

<sup>4</sup> Regulation 18940.2.

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 Shelby Pearce at [spearce@fppc.ca.gov](mailto:spearce@fppc.ca.gov) or 279-237-5972.

Sincerely,

*Christopher B. Burton*

Christopher B. Burton  
Assistant Chief, Enforcement Division

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