



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

January 22, 2025

Sarah Afzal



Warning Letter: Case No. 2024-00186; Sarah Afzal

Dear Sarah Afzal:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act¹ (the “Act”). This letter is in response to a referral from the County of Santa Clara. The Enforcement Division found that as a result of your position as Pediatric Physician with the Santa Clara Valley Health & Hospital System at Valley Medical Center, the Act required you to periodically file a Statement of Economic Interests (“SEI”) and that you failed to timely file your Assuming Office SEI, 2022 Annual SEI, and 2023 Annual 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 an Annual SEI no later than April 1st of each year.³

You violated the Act by failing to timely file your Assuming Office SEI by the August 10, 2022 due date, 2022 Annual SEI by the April 3, 2023 due date, and 2023 Annual SEIs by the April 2, 2024 due date. But the evidence shows that your filing officer’s notifications regarding the SEIs were sent to an email address that you do not regularly have access to because you work very limited hours in the position. Also, you have now filed the missing SEIs and you have not had a prior violation of this section, so 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 may still be required to pay any late filing fees assessed by your filing officer. Please contact your filing officer, Rebekah Davis-Matthews at rebekah.davis-matthe@cob.sccgov.org, for further information. Any

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 Section 87302, subd. (b).

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

If you have questions, please contact me at 916-322-5771 or abreron@fppc.ca.gov.

Sincerely,

Angela J. Breron

Angela J. Breron
Assistant Chief,
Enforcement Division