



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

September 30, 2025

Carrie Baxter

Via email: [REDACTED]

Warning Letter: FPPC Case No. 2024-01330, Carrie Baxter

Dear Carrie Baxter:

The Enforcement Division of the Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to a sworn complaint alleging that you, as a consultant for the City Manager of Santa Rosa, failed to timely report certain economic interests on your Statements of Economic Interests (“SEI”). The Enforcement Division opened an investigation regarding the potential violations of the Act. The Enforcement Division has completed its review and found that, as a result of your position as a consultant for the City Manager of Santa Rosa, the Act required you to periodically file a SEI. The Enforcement Division found that you failed to timely report an economic interest in R3 Consulting Group, Inc. on your 2020, 2021, 2022, 2023, and Leaving Office SEIs.

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

During your time as a consultant for Santa Rosa City Manager, you had an income interest in R3 Consulting Group, Inc., who is doing business in your jurisdiction. Therefore, the income should have been disclosed on Schedule C of your SEIs. Your actions violated the Act because you failed to disclose this income interest on your 2020, 2021, 2022, 2023 Annual SEIs and Leaving Office SEI by the specified deadlines. However, because you are no longer in this position and you do not have an enforcement history, we are closing this 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 file the outstanding SEIs and pay any late filing fees assessed by your filing officer.

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. (a).

Please contact your filing officer, Dina Manis, at CityClerk@srcity.org for further information about your required filings. 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 18360.2 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 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 jrivera@fppc.ca.gov or (279) 237-5913.

Sincerely,

Jonathan Rivera

Jonathan Rivera, Commission Counsel
Enforcement Division

cc: Adina Flores adinayflores707@gmail.com