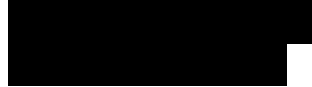




STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811

March 23, 2026

Frank Alioto



Warning Letter re FPPC No. 2025-00387; Frank Alioto

Dear Frank Alioto:

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 has completed its investigation and found that as a result of your position as Board Member for the Behavioral Health Board in Santa Clara County, the Act required you to periodically file a Statement of Economic Interests (“SEI”) and that you failed to timely file your Assuming Office and 2024 Annual 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 Individuals required to file SEIs must file an Assuming Office SEI within 30 days of taking office, and a Leaving Office SEI within 30 days of leaving office.³

You violated the Act by failing to file your Assuming Office by the January 4, 2024 due date and 2024 Annual SEI by the April 1, 2025 due date. However, the Enforcement Division has decided to close this case with a warning letter because you have now filed the required SEIs and you have since resigned from your position. Further, per your resignation letter, you resigned due to your health and inability to fully perform the necessary functions of the Board Member role. Additionally, you do not have a history of violating the Act.

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

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 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Section 87302, subd. (b).

³ *Ibid.*

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, your filing officer may assess late fines. Please contact your filing officer at form700@cob.sccgov.org for further information. 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. This resolution does not provide you with the opportunity for a probable cause hearing or administrative hearing. 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 your case. If we do not receive such notification, this warning letter will be posted on the Commission's website.

Sincerely,

Theresa Gilbertson

Theresa Gilbertson
Attorney Supervisor, Enforcement Division