



STATE OF CALIFORNIA

FAIR POLITICAL PRACTICES COMMISSION

1102 Q Street • Suite 3050 • Sacramento, CA 95811

January 09, 2026

Virginia Baxter

Via email: gbaxter@lbcc.edu

Warning Letter Re: FPPC No. 2026-00031; Virginia Baxter

Dear Virginia Baxter,

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act¹ (the “Act”). As you are aware, the Enforcement Division received a sworn complaint alleging that you disclosed a gift on your 2022 Annual Statement of Economic Interests (“SEIs”), which exceeded the applicable gift limit. The Enforcement Division has completed its review and found that, while you disclosed a gift that exceeded the \$520 gift limit (for calendar years 2021 and 2022), the payment should have been disclosed as income rather than a gift.

The Act requires every state and local agency to develop a Conflict of Interest Code.² The Code designates positions within the agency that make or participate in making governmental decisions.³ Individuals in those positions are required to file SEIs at specified times to disclose reportable economic interests as outlined in the Code that could potentially be affected by the individual’s decision-making authority.⁴

You violated the Act by failing to properly disclose a source of income, American Queen Steamboat Co., on your 2022 Annual SEI filed on March 12, 2023, in connection with your position as a member of the Long Beach Community College District Board of Trustees. However, the Enforcement Division has decided to close this case with a warning letter rather than a fine because you have since filed an amendment to the SEI to disclose American Queen Steamboat Co. as a source of income on Schedule C, the payment was timely disclosed on Schedule D as a gift, and you have no prior history of violating the Act.

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 87300.

³ Section 87302, subd. (a).

⁴ Section 87302, subd. (b).

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.

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 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 questions regarding this letter, please contact Cole Smith at (279) 237-3770 or csmith@fppc.ca.gov.

Sincerely,

Kendall L.D. Bonebrake

Kendall L.D. Bonebrake
Chief, Enforcement Division

KLDB:cts

cc: Curtis Williams, sworn complainant