



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

October 6, 2026

Lisa Fatu



No Action Closure Letter re FPPC No. 2023-00191; Lisa Fatu

Dear Lisa Fatu:

The Enforcement Division of the Fair Political Practices Commission (“FPPC”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is being sent in response to a sworn complaint received by the FPPC on or about January 17, 2023. The complaint alleged that you failed to disclose income from your employment as Director of Youth Crisis Services for Social Advocates for Youth (“SAY”) on Statements of Economic Interests (“SEIs”) filed in connection with the Sonoma County Workforce Investment Board (“WIB”), also referred to as the Workforce Development Board.

The Act requires every state and local government agency to adopt a conflict-of-interest code.² An agency’s conflict-of-interest code identifies the positions required to file SEIs and assigns disclosure categories specifying the economic interests that must be reported.³ The WIB’s conflict-of-interest code designates WIB members as Category 1 filers and requires disclosure of certain investments, income, and business positions involving business entities that provide job training programs or other skills training of the type that may foreseeably be utilized by the Sonoma County Workforce Area.

The Enforcement Division conducted an investigation and has completed its review of the facts in this case. Our investigation confirmed that you filed an Assuming Office SEI and a 2021 Annual SEI on March 16, 2022, on which you reported no reportable interests, and subsequently filed a Leaving Office SEI on July 7, 2023. The investigation also confirmed that

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 87300.

³ Regulation 18730; see also Section 87302.

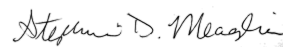
you were employed by SAY for many years, including during at least part of the period covered by the SEIs at issue.

However, under WIB's conflict of interest code in effect at the time, he applicable disclosure category was limited to interests involving a "business entity." Under the Act, a "business entity" is an organization or enterprise operated for profit.⁴ SAY was a nonprofit organization. Therefore, there was insufficient evidence that you had disclosable income under the WIB's applicable conflict of interest code.

Additionally, the investigation raised a separate issue concerning whether you were subject to the WIB's filing requirements in the first instance. Sonoma County WIB staff informed Enforcement that you never served as a member of the WIB, but instead were identified as a proxy for WIB member Anita Maldonado. WIB staff further reported that you never attended a WIB meeting or voted in Maldonado's place. The WIB's conflict-of-interest code designated WIB members as Category 1 filers but did not specifically address proxies. Accordingly, the evidence did not establish that you held a designated WIB position subject to the disclosure category at issue.

Based on the foregoing, there is insufficient evidence to conclude that a violation of the Act occurred. Therefore, the Enforcement Division is closing this matter without further action. Should you have any questions regarding this letter, please contact me at (279) 237-5995 or smeaglia@fppc.ca.gov.

Sincerely,



Stephanie Meaglia
Commission Counsel
Enforcement Division

CC: Adina Flores (Complainant)

⁴ Section 82005.