

KENDALL L.D. BONEBRAKE  
Chief of Enforcement  
JONATHAN E. RIVERA  
Commission Counsel  
**FAIR POLITICAL PRACTICES COMMISSION**  
1102 Q Street, Suite 3050  
Sacramento, CA 95811  
Telephone: (279) 237-5913  
Email: JRivera@fppc.ca.gov

Attorneys for Complainant  
Enforcement Division of the Fair Political Practices Commission

**BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**

**STATE OF CALIFORNIA**

In the Matter of:

ROB RENNIE FOR ASSEMBLY 2022,  
ROB RENNIE, AND ISABELLA  
RENNIE,

Respondents.

FPPC Case No. 2025-00049

**STIPULATION, DECISION AND ORDER**

Date Submitted to Commission: August 2026

**INTRODUCTION**

Respondent, Rob Rennie, was a candidate for Assembly District 28 in the June 7, 2022 Primary Election, and Rob Rennie for Assembly 2022 (the “Committee”) was Rob Rennie’s controlled committee. Isabella Rennie was the Committee’s treasurer.

The Committee was the subject of a Franchise Tax Board (“FTB”) audit. The FTB audit report covered the audit period of January 1, 2022 through December 31, 2022. During the audit period, the Committee reported receiving contributions of approximately \$198,816 and making expenditures of approximately \$221,373. The FTB audit revealed that Rob Rennie, Isabella Rennie, and the Committee had not substantially complied with the disclosure and/or recordkeeping provisions of the Act.<sup>1</sup> The Act

<sup>1</sup> The Political Reform Act – sometimes simply referred to as the Act – is contained in Government Code sections 81000 through 91014. 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. All regulatory references are to this source.

requires candidates and committees to maintain detailed campaign records, file semi-annual campaign statements, pre-election campaign statements, and to report contributions. Rob Rennie, Isabella Rennie, and the Committee violated the Act by failing to maintain detailed campaign records for contributions received and expenditures made, failing to file in paper format the second pre-election campaign statement with the Secretary of State's office, failing to file in paper format a semi-annual campaign statement with the Secretary of State's office, and failing to report a contribution.

## **SUMMARY OF THE LAW**

The Act and its regulations are amended from time to time. The violations in this case occurred in 2022. For this reason, all legal references and discussions of law pertain to the Act's provisions as they existed at that time.

### **Need for Liberal Construction and Vigorous Enforcement of the Political Reform Act**

When enacting the Act, the people of California found and declared that previous laws regulating political practices suffered from inadequate enforcement by state and local authorities.<sup>2</sup> Thus, it was decreed the Act "should be liberally construed to accomplish its purposes."<sup>3</sup>

A central purpose of the Act is to promote transparency by ensuring that receipts and expenditures in election campaigns are fully and truthfully disclosed so that voters are fully informed and improper practices are inhibited.<sup>4</sup> Another purpose of the Act is to provide adequate enforcement mechanisms so that the Act will be "vigorously enforced."<sup>5</sup>

### **Recordkeeping**

It shall be the duty of each candidate and treasurer to maintain detailed accounts, records, bills, and receipts necessary to prepare campaign statements and to establish that campaign statements were properly filed.<sup>6</sup> A filer shall maintain the accounts, records, bills and receipts, and original source documentation for a period of four years following the date the campaign statement to which they relate is filed.<sup>7</sup>

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<sup>2</sup> Section 81001, subd. (h).

<sup>3</sup> Section 81003.

<sup>4</sup> Section 81002, subd. (a).

<sup>5</sup> Section 81002, subd. (f).

<sup>6</sup> Section 84104.

<sup>7</sup> Regulation 18401, subd. (b)(2).

1 **Controlled Committee**

2 A controlled committee means a committee that is controlled directly or indirectly by a  
3 candidate.<sup>8</sup> A candidate controls a committee if they have a significant influence on the actions or  
4 decisions of the committee.<sup>9</sup>

5 **Duty to File Campaign Statements**

6 The Act requires committees and treasurers to file campaign statements and reports at specific  
7 times disclosing information regarding contributions received and expenditures made by the campaign  
8 committees.<sup>10</sup> If the filing due date for a statement or report falls on a Saturday, Sunday, or official state  
9 holiday, then the filing due date shall be extended to the next regular business day.<sup>11</sup>

10 **Pre-Election Campaign Statements**

11 The Act requires all candidates appearing on the ballot to be voted on at the next election to file  
12 pre-election campaign statements as follows: (1) for the period ending 45 days before the election, the  
13 statement shall be filed no later than 40 days before the election, and (2) for the period ending 17 days  
14 before the election the statement shall be filed no later than 12 days before the election.<sup>12</sup>

15 **Semi-Annual Campaign Statements**

16 A candidate-controlled committee shall file semi-annual campaign statements each year no later  
17 than July 31 for the period ending June 30, and no later than January 31 for the period ending December  
18 31.<sup>13</sup>

19 **Electronic and Paper Filing**

20 Any candidate or committee who are required to file statements in connection with a state  
21 elective office that cumulatively receives contributions or makes expenditures totaling \$25,000 or more  
22 is required to file campaign statements online or electronically with the Secretary of State.<sup>14</sup> Once a  
23 candidate or committee is required to file online or electronically, the candidate or committee is required  
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<sup>8</sup> Section 82016, subd. (a).

26 <sup>9</sup> *Id.*

27 <sup>10</sup> See Section 84200, *et seq.*

28 <sup>11</sup> Regulation 18116, subd. (a).

<sup>12</sup> Sections 84200.5 and 84200.8.

<sup>13</sup> Section 84200, subd. (a).

<sup>14</sup> Section 84605, subd. (a)(1).

to file all subsequent reports online or electronically.<sup>15</sup> Persons filing online or electronically are also required to continue to file statements and reports in paper format.<sup>16</sup>

### **Contents of Campaign Statements**

If the cumulative amount of contributions received from a person is \$100 or more and a contribution has been received from that person during the period covered by the campaign statement, then the campaign statement shall contain the following contributor information: full name; street address; occupation; name of employer; date and amount received; and cumulative amount of contributions.<sup>17</sup>

### **Joint and Several Liability of Committee and Treasurer**

It is the duty of the treasurer of a committee to ensure that the committee complies with the campaign reporting provisions of the Act.<sup>18</sup> It is the duty of the committee's principal officer to authorize the content of communications made by the committee, authorize expenditures made by the committee, and determine the committee's campaign strategy.<sup>19</sup> A treasurer and principal officer may be held jointly and severally liable for violations committed by the committee.<sup>20</sup>

### **Liability for Violations**

Any person who violates any provision of the Act is liable for administrative penalties up to \$5,000 per violation.<sup>21</sup>

## **SUMMARY OF THE FACTS**

The FTB audit found that Respondents did not substantially comply with the disclosure and/or recordkeeping provisions of the Act and related rules and regulations of the Fair Political Practices Commission. The FTB audit report covered the audit period of January 1, 2022 through December 31, 2022. During the audit period, the Committee reported receiving contributions of approximately \$198,816 and making expenditures of approximately \$221,373.

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<sup>15</sup> Section 84605, subd. (d).

<sup>16</sup> Section 84605, subd. (f).

<sup>17</sup> Section 84211, subd. (f).

<sup>18</sup> Section 84104; Regulation 18427, subd. (a).

<sup>19</sup> Section 82047.6; Regulation 18402.1, subd. (b).

<sup>20</sup> Sections 83116.5 and 91006.

<sup>21</sup> Sections 83116 and 83116.5.

1 **Failure to Maintain Detailed Campaign Records**

2 According to the audit report, the Committee reported receiving contributions of approximately  
3 \$198,816 during the FTB audit period. According to the audit report, the Committee did not maintain  
4 copies of contributors' checks, credit card authorization records from Nationbuilder, contributor reply to  
5 forms, and/or duplicate deposit slips for contributions received totaling \$70,641.

6 Rob Rennie stated in an email to the FTB auditor that the Committee had stored the majority of  
7 their records online on the Nationbuilder platform. Rob Rennie added that, after the election, the  
8 Respondents decided to discontinue the storage services provided by Nationbuilder. Subsequently,  
9 Nationbuilder ceased their access to their account, and they lost all their records.

10 According to the audit report, the Committee spent approximately \$221,373 on expenditures  
11 during the FTB audit period. The Committee did not maintain invoices and/or receipts for expenditures  
12 made totaling \$98,427. Of this amount, canceled checks and/or other records to verify the payment  
13 method were not maintained for expenditures made totaling \$8,775. The lack of records precluded the  
14 determination of whether accrued expense and/or subvendor disclosure was required. According to the  
15 audit report, the Committee did provide bank statements. Rob Rennie stated in an email to the FTB  
16 auditor that the Committee stored the majority of their expenditure records online on the Google  
17 platform. Rob Rennie added that once the Respondents discontinued the Google account, their access to  
18 their records stored on this platform was discontinued.

19 **Failure to Timely File Pre-Election Campaign Statement**

20 Prior to the June 7, 2022 Primary Election, candidate-controlled committees were required to file  
21 the second pre-election campaign statement for the reporting period of April 24, 2022 through May 21,  
22 2022 by May 26, 2022. The Respondents timely filed the pre-election campaign statement  
23 electronically. However, while the statement was timely filed electronically, the statement was not filed  
24 in paper format with the Secretary of State. On the pre-election campaign statement for the period  
25 ending May 21, 2022, the Committee reported contributions of \$33,760 and expenditures of \$126,416.

26 **Failure to Timely File Semi-Annual Campaign Statement**

27 Candidate-controlled committees were required to file the semi-annual campaign statement for  
28 the reporting period of May 22, 2022 through June 30, 2022 by August 1, 2022. Respondents timely

1 filed the semi-annual campaign statement electronically. However, while the statement was timely filed  
2 electronically, the statement was not filed in paper format with the Secretary of State. On the semi-  
3 annual campaign statement for the period ending June 30, 2022, the Committee reported contributions of  
4 \$25,155 and expenditures of \$94,014.

5 **Failure to Timely Report Contribution**

6 For their campaign, the candidate, Rob Rennie, loaned their Committee \$100,000. On the semi-  
7 annual campaign statement for the reporting period of July 1, 2022 through December 31, 2022, the  
8 Committee disclosed forgiving a portion of the loan in the amount of \$22,557 in the Loans Received  
9 section (Schedule B) of the campaign statement. Under the Act, a contribution includes the forgiveness  
10 of a loan. As a candidate is considered a contributor, the Committee was required to disclose this  
11 contribution, and other information, in the Monetary Contributions Received section (Schedule A) of the  
12 campaign statement.

13 **VIOLATIONS**

14 **Count 1: Failure to Maintain Detailed Campaign Records**

15 The Committee, Rob Rennie, and Isabella Rennie failed to maintain detailed campaign records  
16 for contributions received and expenditures made between January 1, 2022 through December 31, 2022  
17 totaling \$70,641 and \$98,427 respectively, in violation of Government Code Section 84104.

18 **Count 2: Failure to Timely File Pre-Election Campaign Statement**

19 Prior to the 2022 Primary Election, Rob Rennie, Isabella Rennie, and the Committee, failed to  
20 timely file the second pre-election campaign statement in paper format for the reporting period of April  
21 24, 2022 through May 21, 2022 by the May 26, 2022 due date, in violation of Sections 84200.5,  
22 84200.8, 84215(a) and 84605.

23 **Count 3: Failure to Timely File Semi-Annual Campaign Statement**

24 The Committee, Rob Rennie, and Isabella Rennie failed to timely file a semiannual campaign  
25 statement in paper format for the reporting period of May 22, 2022 through June 30, 2022 by the August  
26 1, 2022 due date, in violation of Sections 84200, 84215(a) and 84605.

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**Count 4: Failure to Timely Report Contribution**

The Committee, Rob Rennie, and Isabella Rennie failed to timely disclose a contribution received in the form of forgiveness of a loan on the semiannual statement for the reporting period of July 1, 2022 through December 31, 2022 by the January 31, 2023 due date, in violation of Section 84211.

**PROPOSED PENALTY**

This matter consists of four proposed counts. The maximum penalty that may be imposed is \$5,000 per count. Thus, the maximum penalty that may be imposed for the counts charged here is \$20,000.<sup>22</sup>

This case is excluded from the Tier One Streamline Program because the Committee's activity during the reporting period during which the Committee's campaign statement was not timely filed exceeded \$10,000.<sup>23</sup> This case is excluded from the Tier Two Streamline Program because the Committee's activity during the reporting period during which the Committee's campaign statement was not timely filed exceeded \$50,000.<sup>24</sup>

In determining the appropriate penalty for a particular violation of the Act, the Enforcement Division considers the typical treatment of a violation in the overall statutory scheme of the Act, with an emphasis on serving the purposes and intent of the Act. Additionally, the Enforcement Division considers the facts and circumstances of the violation in the context of the following factors set forth in Regulation 18361.5 subdivision (e)(1) through (8): (1) The extent and gravity of the public harm caused by the specific violation; (2) The level of experience of the violator with the requirements of the Political Reform Act; (3) Penalties previously imposed by the Commission in comparable cases; (4) The presence or absence of any intention to conceal, deceive or mislead; (5) Whether the violation was deliberate, negligent or inadvertent; (6) Whether the violator demonstrated good faith by consulting the Commission staff or any other governmental agency in a manner not constituting complete defense under Government Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern and whether the violator has a prior record of violations of the Political Reform Act or similar laws; and

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<sup>22</sup> Section 83116, subd. (c).

<sup>23</sup> Regulation 18360.1, subd. (e)(1).

<sup>24</sup> Regulation 18360.1, subd. (e)(1).

1 (8) Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide  
2 full disclosure.<sup>25</sup>

3 One of the essential purposes of the recordkeeping provision is to establish that campaign  
4 statements were properly filed, and contributions and expenditures were properly reported. This  
5 violation is considered more serious when the failure to maintain campaign records inhibits audit efforts.  
6 The public harm inherent in campaign reporting violations is that the public is deprived of important,  
7 time-sensitive information regarding campaign activity. Generally, these types of violations are  
8 considered to be more serious when the public is deprived of information that was required to be  
9 disclosed prior to an election because this has the potential to affect how votes are cast. Rob Rennie was  
10 aware of the recordkeeping provisions and campaign reporting provisions from their prior history of  
11 running for local office which dates back to 2014 when they were first elected to the Los Gatos City  
12 Council. Though this was their first time running for state office. Another factor that influences the  
13 seriousness of the violation is whether the public harm was mitigated because some of the reportable  
14 activity was disclosed, prior to the election, on another campaign filing. The seriousness of the campaign  
15 reporting violations committed here are mitigated due to the Committee's reportable activity being fully  
16 disclosed on timely filed campaign statements that were filed electronically. Further, the Enforcement  
17 Division found no evidence that Respondents intended to conceal, deceive, or mislead the public. The  
18 records were maintained during the campaign but were no longer accessible after the election after  
19 Respondents stopped paying for the services. The violations are isolated to this election as this was for a  
20 state office while Respondent had previously run for local office.

21 The Commission considers penalties in prior cases with the same or similar violations and  
22 comparable facts.

### 23 **Count 1: Failure to Maintain Detailed Campaign Records**

24 *In the Matter of Greg Rodriguez for 42<sup>nd</sup> State Assembly, 2016 and Greg Rodriguez*; FPPC No.  
25 2018-00179. Respondents, an unsuccessful candidate for the 42nd Assembly District and their  
26 committee, failed to maintain detailed campaign records of contributions received and expenditures  
27 made between January 1, 2015 through December 8, 2016 totaling \$212,025 and \$206,169 respectively,  
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<sup>25</sup> Regulation 18361.5, subd. (e).

1 in violation of Government Code Section 84104. In June 2020, the Commission approved a penalty of  
2 \$2,000 for this count.

3 A similar penalty to that approved in the *Rodriguez* case is recommended. Similar to *Rodriguez*,  
4 the respective committees maintained the records until the election and after their defeat, they stopped  
5 paying for the services to retain the records. However, in *Rodriguez*, the respondent retained the  
6 Committee's campaign bank statements, copies of processed checks of expenditures, and a check  
7 register, providing examples of some records that were maintained, but not enough to create a full  
8 picture of the contributions or expenditures.

9 **Counts 2 and 3: Failure to Timely File Pre-Election and Semi-Annual Campaign Statements**

10 *In the Matter of James Elia for State Assembly, James Elia, and Sara Kagy*; FPPC No. 2018-  
11 01372. Respondents, an unsuccessful candidate for the 71st Assembly District, the committee, and the  
12 committee's treasurer, failed to timely file four pre-election campaign statements in paper format and  
13 one semiannual campaign statement in paper format and one semiannual campaign statement in paper  
14 and electronic format in violation of Sections 84200, 84200.5, 84200.8, 84215(a), and 84605(f). In April  
15 2020, the Commission approved a penalty of \$3,000; \$1,500 per count.

16 A higher penalty of \$2,000 for each count is recommended for Counts 2 and 3. Similar to *Elia*,  
17 the information on the non-filed statements was timely disclosed when the statements were timely filed  
18 electronically. However, while there are fewer late statements here as compared to *Elia*, the activity on  
19 these statements is much higher than in *Elia*.

20 **Count 4: Failure to Timely Report Contribution**

21 *In the Matter of Re-Elect Magdalena Carrasco for City Council D5 2018, Magdalena Carrasco,*  
22 *and Huascar Castro*; FPPC No. 2018-01404. Respondents, a successful candidate for San Jose City  
23 Council District 5, their committee and treasurer, failed to report contributions received and contributor  
24 information totaling \$24,100, in violation of Government Code Section 84211. In April 2020, the  
25 Commission approved a penalty of \$1,500 for this count.

26 A similar penalty to that approved in the *Carrasco* case is recommended. The undisclosed  
27 contribution amount is similar to that in *Carrasco*. Unlike *Carrasco*, the information was partially  
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disclosed in the statement, as it was reported in one section of the campaign statement, but not another, required section.

Under these circumstances, it is respectfully submitted that imposition of an agreed-upon penalty in the amount of \$7,500 is justified.

| Count | Violation                                              | Proposed Penalty |
|-------|--------------------------------------------------------|------------------|
| 1     | Failure to Maintain Detailed Campaign Records          | \$2,000          |
| 2     | Failure to Timely File Pre-Election Campaign Statement | \$2,000          |
| 3     | Failure to Timely File Semiannual Campaign Statement   | \$2,000          |
| 4     | Failure to Timely Report Contribution                  | \$1,500          |

### CONCLUSION

Complainant, the Enforcement Division of the Fair Political Practices Commission, and Respondents, Rob Rennie for Assembly 2022, Rob Rennie, and Isabella Rennie, hereby agree as follows:

- Respondents violated the Act as described in the foregoing pages, which are a true and accurate summary of the facts in this matter.
- This stipulation will be submitted for consideration by the Fair Political Practices Commission at its next regularly scheduled meeting – or as soon thereafter as the matter may be heard.
- This stipulation resolves all factual and legal issues raised in this matter – for the purpose of reaching a final disposition without the necessity of holding an administrative hearing to determine the liability of Respondents pursuant to Section 83116.
- Respondents understand, and hereby knowingly and voluntarily waive, any and all procedural rights set forth in Sections 83115.5, 11503, 11523, and Regulations 18361.1 through 18361.9. This includes, but is not limited to the right to appear personally at any administrative hearing held in this matter, to be represented by an attorney at Respondents' own expense, to confront and cross-examine all witnesses testifying at the hearing, to subpoena witnesses to

1 testify at the hearing, to have an impartial administrative law judge preside over the hearing as a  
2 hearing officer, and to have the matter judicially reviewed.

3 5. Respondents agree to the issuance of the decision and orders set forth below. Also,  
4 Respondents agree to the Commission imposing against them an administrative penalty in the  
5 amount of \$7,500. One or more cashier's checks or money orders totaling said amount – to be  
6 paid to the General Fund of the State of California – is/are submitted with this stipulation as full  
7 payment of the administrative penalty described above, and same shall be held by the State of  
8 California until the Commission issues its decision and order regarding this matter.

9 6. If the Commission refuses to approve this stipulation – then this stipulation shall become  
10 null and void, and within fifteen business days after the Commission meeting at which the  
11 stipulation is rejected, all payments tendered by Respondents in connection with this stipulation  
12 shall be reimbursed to Respondents. If this stipulation is not approved by the Commission, and if  
13 a full evidentiary hearing before the Commission becomes necessary, neither any member of the  
14 Commission, nor the Executive Director, shall be disqualified because of prior consideration of  
15 this stipulation.

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1 7. The parties to this agreement may execute their respective signature pages separately. A  
2 copy of any party's executed signature page, including a hardcopy of a signature page  
3 transmitted via fax or as a PDF email attachment, is as effective and binding as the original.  
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6 Dated: \_\_\_\_\_  
7 Kendall L.D. Bonebrake, Chief of Enforcement  
8 Fair Political Practices Commission  
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10 Dated: \_\_\_\_\_  
11 Rob Rennie, individually and on behalf of  
12 Rob Rennie for Assembly 2022, Respondents  
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14 Dated: \_\_\_\_\_  
15 Isabella Rennie, Respondent  
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17 The foregoing stipulation of the parties "Rob Rennie for Assembly 2022, Rob Rennie, and  
18 Isabella Rennie," FPPC Case No. 2025-00049, is hereby accepted as the final decision and order of the  
19 Fair Political Practices Commission, effective upon execution by the Chair.

20 IT IS SO ORDERED.  
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22 Dated: \_\_\_\_\_  
23 Adam E. Silver, Chair  
24 Fair Political Practices Commission  
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