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8
9 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION
10 STATE OF CALIFORNIA

11 In the Matter of:

12 CALIFORNIA REPUBLICAN PARTY,
13 GREG GANDRUD, and SARAH
NELSON

14 Respondents.

FPPC Case No. 2020-01009

STIPULATION, DECISION AND ORDER

Date Submitted to Commission: February 2026

15
16 **INTRODUCTION**

17 Respondent California Republican Party is a political party committee. Greg Gandrud was the
18 treasurer at the time of the violations, and Sarah Nelson was the principal officer. This case was opened
19 in response to a sworn complaint. The Political Reform Act¹ (“Act”) requires committees to disclose
20 additional information when expenditures are in support or in opposition to candidates on the ballot, such
21 as the name and office sought of the candidate and whether the expenditure was a contribution or an
22 independent expenditure. Additionally, the Act requires committees timely file 24-hour independent
23 expenditure reports. When independent expenditures are in the form of advertisements, the advertisement
24 must include a statement indicating that it was not authorized by a candidate or a committee controlled
25 by a candidate.

26
27 _____
28 ¹ 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.

1 **SUMMARY OF THE LAW**

2 The Act and its regulations are amended from time to time. All legal references and discussions
3 of law are intended to be citations to statutes and regulations as they existed at the time of the violations
4 in this case.

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

6 When enacting the Political Reform Act, the people of California found and declared that
7 previous laws regulating political practices suffered from inadequate enforcement by state and local
8 authorities.² Thus, it was decreed that the Act “should be liberally construed to accomplish its
9 purposes.”³

10 Another purpose of the Act is to provide adequate enforcement mechanisms so that the Act will
11 be “vigorously enforced.”⁴

12 **Independent Expenditure**

13 An “independent expenditure” includes any monetary or nonmonetary payment made by any
14 person, including a payment of public moneys by a state or local governmental agency, in connection
15 with a communication which expressly advocates the election or defeat of a clearly identified candidate
16 or the qualification, passage or defeat of a clearly identified measure, or taken as a whole and in context,
17 unambiguously urges a particular result in an election but which is not made to or at the behest of the
18 affected candidate or committee.⁵

19 The Act describes what it means to “expressly advocate” in the definition of “expenditure”.⁶ A
20 communication “expressly advocates” the nomination, election, or defeat of a candidate or the
21 qualification, passage, or defeat of a measure if it contains express words of advocacy such as “vote for,”
22 “elect,” “support,” “cast your ballot,” “vote against,” “defeat,” “reject,” “sign petitions for,” or, within 60
23 days before an election in which the candidate or measure appears on the ballot, the communication
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25
26 _____
27 ² Section 81001, subdivision (h).

28 ³ Section 81003.

⁴ Section 81002, subdivision (f).

⁵ Section 82031.

⁶ See Section 82025.

1 otherwise refers to a clearly identified candidate or measure so that the communication, taken as a whole,
2 unambiguously urges a particular result in an election.

3 A communication, taken as a whole, unambiguously urges a particular result in an election if it is
4 not susceptible of any reasonable interpretation other than as an appeal to vote for or against a specific
5 candidate or measure. A communication is not susceptible of any reasonable interpretation other than as
6 an appeal to vote for or against a specific candidate or measure when, taken as a whole, it could only be
7 interpreted by a reasonable person as containing an appeal to vote for or against a specific candidate or
8 measure because of both of the following: a) the electoral portion of the communication is unmistakable,
9 unambiguous, and suggestive of only one meaning and b) reasonable minds could not differ as to
10 whether it encourages a vote for or against a clearly identified candidate or measure, or encourages some
11 other kind of action on a legislative, executive, or judicial matter or issue.

12 The Act provides for a “Safe Harbor” provision, where, a communication does not expressly
13 advocate for the nomination, election, or defeat of a candidate, or the qualification, passage, or defeat of
14 a measure, within the meaning of this section, if both of the following apply: a) the communication does
15 not mention an election, candidacy, political party unless required by law, opposing candidate, or voting
16 by the general public, and it does not take a position on the character, qualifications, or fitness for office
17 of a candidate or officeholder, or the merits of a ballot measure and b) the communication focuses on a
18 legislative, executive, or judicial matter of issue, either urging a candidate to take a particular position or
19 action with respect to the matter or issue, or urging the public to adopt a particular position and to contact
20 the candidate with respect to the matter or issue.

21 If a communication does not qualify for the safe harbor described in subparagraph (c)(2)(D), the
22 commission shall consider if the communication has an interpretation other than as an appeal to vote for
23 or against a clearly identified candidate or measure, in order to determine if, on balance, the
24 communication is not susceptible of any reasonable interpretation other than as an appeal to vote for or
25 against a clearly identified candidate or measure.

26 **Duty to Report Expenditures Opposing a Candidate**

27 Committees are required to disclose campaign activity by reporting contributions and
28 expenditures. In the case of an expenditure which is an independent expenditure to support or oppose a

1 candidate, the committee must report the date of the independent expenditure, the cumulative amount of
2 independent expenditures made relative to a candidate or measure, the full name of the candidate, and the
3 office and district for which the candidate seeks nomination or election.⁷

4 **Late Independent Expenditure Reports**

5 A “late independent expenditure” means an independent expenditure that totals in the aggregate
6 one thousand dollars (\$1,000) or more and is made for or against a specific candidate or measure
7 involved in an election during the 90-day period preceding the date of the election or on the date of the
8 election.⁸ A committee that makes a late independent expenditure shall report it within 24 hours of the
9 time it is made.⁹

10 **Required Advertisement Disclosure**

11 Any advertisement that is paid for by a political party committee shall include the words, “Ad
12 paid for by” followed by the name of the committee as it appears on the most recent Statement of
13 Organization if the advertisement is paid for by an independent expenditure, an advertisement supporting
14 or opposing a ballot measure, a radio or television advertisement, or a text message required to include a
15 disclosure.¹⁰

16 An advertisement supporting or opposing a candidate that is paid for by an independent
17 expenditure shall include a statement that it was not authorized by a candidate or a committee controlled
18 by a candidate.¹¹

19 An advertisement that is an independent expenditure and paid for by a political party committee
20 shall include the disclosures as described above, the name of the committee and the “not authorized by”
21 language.¹² In addition, the Act has specific formatting requirements that vary depending on the type of
22 advertisement. For a video advertisement, the required disclosures must be in writing at the beginning or
23 end of the advertisement in a text that is of sufficient size to be readily legible to an average viewer and
24 in a color that has a reasonable degree of contrast with the background of the advertisement for at least
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26 ⁷ Section 84211, subdivision (k)(5).

27 ⁸ Section 82036.5.

28 ⁹ Section 84204.

¹⁰ Section 84502, subdivision (a)(2).

¹¹ Section 84506.5.

¹² Section 84504.5.

1 four seconds.¹³ The required disclosure must also be spoken during the advertisement if the written
2 disclosure appears for less than five seconds of a broadcast of 30 seconds or less or for less than 10
3 seconds of a broadcast that lasts longer than 30 seconds. For a print advertisement, the disclosure is
4 required to be in no less than 10-point font and in a color that has a reasonable degree of contrast with the
5 background of the advertisement.¹⁴

6 **SUMMARY OF THE FACTS**

7 During the 2020 General Election cycle, the California Republican Party issued a number of
8 advertisements, including several mailings and one video, that expressly advocated against the election of
9 clearly identifiable candidates. The advertisements were issued with the last 60 days before an election in
10 which the clearly identified candidate was on the ballot and the communication, when taken as a whole,
11 unambiguously urged a particular result in an election. Therefore, these advertisements were independent
12 expenditures.¹⁵

13 On campaign statements, including for the reporting periods of September 20, 2020 through
14 October 17, 2020 and October 18, 2020 through December 31, 2020, the California Republican Party
15 failed to include the additional information required for independent expenditures, such as the date of the
16 independent expenditure, the cumulative amount of independent expenditures made relative to a
17 candidate, the full name of the candidate, the office and district for which the candidate sought. In
18 mitigation, Respondents filed disclosure statements as if the advertisements were “issue” ads. Section
19 85310 provides that any person that makes a payment totaling \$50,000 or more for a communication that
20 clearly identifies a candidate for elective state office but does not expressly advocate for the election or
21 defeat of the candidate and the advertisement is published within 45 days of an election, that filer shall
22 file online with the Secretary of State and report the amount of the payment within 48 hours of making
23 the payment. The California Republican Party filed this report for each of the advertisements referenced
24 in the chart below.

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¹³ Section 84504.5, subdivision (b).

¹⁴ Section 84504.5, subdivision (c).

28 ¹⁵ The Enforcement Division’s investigation did not find evidence that the advertisements at issue were coordinated
with candidates or other candidate’s committees.

1 Republican Party unambiguously urged the reader to vote against Mueller. This mailing has been
2 attached as Exhibit A.

3 **Mailer Opposing Josh Newman, September 28, 2020**

4 Respondents distributed a mailer on or around September 28, 2020 that clearly identified Josh
5 Newman, then a candidate for Senate District 29. Newman was successful in the election over Ling Ling
6 Chang, receiving 51.3% of the vote. The advertisement states, “Jo\$h Newman, Sold Out to Special
7 Interests,” and includes statements by purported voters. For example, a quote from a purported retired
8 resident states, “Josh Newman wants to weaken Proposition 13 and make it easier to raise property taxes
9 by billions.” The quotes focus on the issues, including raising property taxes, a car and gas tax increase,
10 Newman’s support for studying a mileage-based tax, wasting taxpayer dollars, and Newman’s position
11 on regulating healthcare. Finally, the communication states that Newman was recalled with 58% of the
12 vote. This mailing does not qualify for the Safe Harbor provision because it fails to urge the reader to
13 contact Newman about a legislative, executive, or judicial matter or issue. Instead, the only reasonable
14 interpretation is that voting for Newman would be harmful, particularly to lower income working people,
15 and taken as a whole, the mailer encourages the reader to vote against Newman in the election. This
16 mailing has been attached as Exhibit B.

17 **Mailer Opposing Melissa Fox, October 1, 2020**

18 Respondents distributed a mailer on or around October 1, 2020 that clearly identified Melissa
19 Fox, then a candidate for Assembly District 68. Fox was ultimately not successful, losing to Steve Choi
20 after receiving only 46.9% of the vote. The advertisement features a lawsuit that Fox was named in,
21 highlighting that Fox was sued for “wrongful conduct” by both investors and the SEC. The mailer refers
22 to a “ponzi-like scheme” and highlights excerpts from the lawsuit’s pleadings, including “breach of
23 fiduciary duty, making false investment claims, misuse of client funds.” The communication suggests
24 that Fox is not fit for office. The mailing does not qualify for the Safe Harbor provision because it
25 suggests that Fox is not fit for office and fails to urge the reader to contact Fox about a legislative,
26 executive, or judicial matter or issue. Instead, the only reasonable interpretation is that Fox is
27 untrustworthy, and taken as a whole, the mailer encourages the reader to vote against Fox in the election.
28 This mailing has been attached as Exhibit C.

1 **Mailer Opposing Josh Newman, October 5, 2020**

2 Respondents distributed a mailer on or around October 5, 2020 that clearly identified Josh
3 Newman, then a candidate for Senate District 29. Newman was successful in the election over Ling Ling
4 Chang, receiving 51.3% of the vote. The advertisement states, “Josh Newman wants to blow up Prop 13
5 and raise property taxes by billions.” The text focuses on the gas tax and Newman’s prior recall from
6 office. The advertisement asks, “Newman was recalled after abusing his power. Can we afford him in the
7 Senate, Again?” This mailing does not qualify for the Safe Harbor provision because it fails to urge the
8 reader to contact Newman about a legislative, executive, or judicial matter or issue. Based on the text of
9 the advertisement, the only reasonable interpretation is that voting for Newman for State Senate would be
10 harmful because he advocates for higher taxes and wastes taxpayer money, and taken as a whole, the
11 mailer encourages the reader to vote against Newman in the election. This mailing has been attached as
12 Exhibit D.

13 **Digital Advertisement Opposing Andrew Rodriguez, October 30, 2020**

14 Respondents distributed a digital video advertisement on or around October 30, 2020 that clearly
15 identified Andrew Rodriguez, then a candidate for Assembly District 55. At the end of the video, the
16 audio states, “No on Andrew Rodriguez for Assembly” and the text on screen states, “No on Andrew
17 Rodriguez.” The communication contained words of express advocacy opposed to Rodriguez.

18 **VIOLATIONS**

19 **Count 1: Failure to Timely Disclose Reportable Activity on a Campaign Statement**

20 Respondents California Republican Party, Gandrud, and Nelson failed to timely disclose
21 reportable activity on a campaign statement filed for the reporting period of September 20, 2020 through
22 October 17, 2020 and October 18, 2020 through December 31, 2020. Specifically, Respondents failed to
23 disclose additional information for independent expenditures, as required by Government Code section
24 84211, subdivision (k)(5).

25 **Count 2: Failure to Timely File a 24-hour Independent Expenditure Report**

26 Respondents California Republican Party, Gandrud, and Nelson failed to timely file a 24-hour
27 Independent Expenditure Report in connection with two independent expenditures made on September
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1 28, 2020, one opposing Kipp Mueller and the other opposing Josh Newman, in violation of Government
2 Code section 84204.

3 **Count 3: Failure to Timely File a 24-hour Independent Expenditure Report**

4 Respondents California Republican Party, Gandrud, and Nelson failed to timely file a 24-hour
5 Independent Expenditure Report in connection with the October 1, 2020 independent expenditure
6 opposing Melissa Fox, in violation of Government Code section 84204.

7 **Count 4: Failure to Timely File a 24-hour Independent Expenditure Report**

8 Respondents California Republican Party, Gandrud, and Nelson failed to timely file a 24-hour
9 Independent Expenditure Report in connection with the October 5, 2020 independent expenditure
10 opposing Josh Newman, in violation of Government Code section 84204.

11 **Count 5: Failure to Timely File a 24-hour Independent Expenditure Report**

12 Respondents California Republican Party, Gandrud, and Nelson failed to timely file a 24-hour
13 Independent Expenditure Report in connection with the October 30, 2020 independent expenditure
14 opposing Andrew Rodriguez, in violation of Government Code section 84204.

15 **Count 6: Failure to Include Proper Disclosure on an Advertisement**

16 On or around September 28, 2020, Respondents California Republican Party, Gandrud, and
17 Nelson issued an advertisement featuring a clearly identified candidate, Kipp Mueller, that expressly
18 advocated against the election of Mueller under Section 82025, subdivision (b)(2). The advertisement
19 included the advertisement disclosure identifying the California Republican Party as the sender.
20 However, Respondents California Republican Party, Gandrud, and Nelson failed to include the required
21 language for independent expenditures, in violation of Government Code section 84506.5.

22 **Count 7: Failure to Include Proper Disclosure on an Advertisement**

23 On or around September 28, 2020, Respondents California Republican Party, Gandrud, and
24 Nelson issued an advertisement featuring a clearly identified candidate, Josh Newman, that expressly
25 advocated against the election of Newman under Section 82025, subdivision (b)(2). The advertisement
26 included the advertisement disclosure identifying the California Republican Party as the sender.
27 However, Respondents California Republican Party, Gandrud, and Nelson failed to include the required
28 language for independent expenditures, in violation of Government Code section 84506.5.

1 **Count 8: Failure to Include Proper Disclosure on an Advertisement**

2 On or around October 1, 2020, Respondents California Republican Party, Gandrud, and Nelson
3 issued an advertisement featuring a clearly identified candidate, Melissa Fox, that expressly advocated
4 against the election of Fox under Section 82025, subdivision (b)(2). The advertisement included the
5 advertisement disclosure identifying the California Republican Party as the sender. However,
6 Respondents California Republican Party, Gandrud, and Nelson failed to include the required language
7 for independent expenditures, in violation of Government Code section 84506.5.

8 **Count 9: Failure to Include Proper Disclosure on an Advertisement**

9 On or around October 5, 2020, Respondents California Republican Party, Gandrud, and Nelson
10 issued an advertisement featuring a clearly identified candidate, Josh Newman, that expressly advocated
11 against the election of Newman under Section 82025, subdivision (b)(2). The advertisement included the
12 advertisement disclosure identifying the California Republican Party as the sender. However,
13 Respondents California Republican Party, Gandrud, and Nelson failed to include the required language
14 for independent expenditures, in violation of Government Code section 84506.5.

15 **Count 10: Failure to Include Proper Disclosure on an Advertisement**

16 On or around October 27, 2020, Respondents California Republican Party, Gandrud, and Nelson
17 issued an advertisement featuring a clearly identified candidate, Andrew Rodriguez, that expressly
18 advocated against the election of Rodriguez under Section 82025, subdivision (b)(2). The advertisement
19 included the advertisement disclosure identifying the California Republican Party as the sender.
20 However, Respondents California Republican Party, Gandrud, and Nelson failed to include the required
21 language for independent expenditures, in violation of Government Code section 84506.5.

22 **PROPOSED PENALTY**

23 This matter consists of ten proposed counts. The maximum penalty that may be imposed is
24 \$5,000 per count.¹⁶ Thus, the maximum penalty that may be imposed is \$50,000.

25 The violations at issue here are typically eligible for the Streamline Settlement Program.
26 However, the Enforcement Division has determined that the extent and gravity of the public harm in the
27 aggregate is more than minimal. Additionally, this case involves fact-specific analyses of when
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¹⁶ See Section 83116, subdivision (c).

1 communications will qualify as expenditures under the Act and therefore, a mainline settlement is
2 appropriate to provide additional relevant details.

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

16 With respect to the first factor, the Act seeks to protect the integrity of our electoral process by
17 ensuring that voters know who is responsible for the political advertisements that seek to influence how
18 they cast their ballot, and the voting public is harmed when that information is not included on campaign
19 advertisements. The public harm inherent in campaign reporting violations is that the public is deprived
20 of important, time-sensitive information regarding campaign activity, which is heightened when related
21 to pre-election activity. In this case, the public harm was caused by the advertisement failing to clearly
22 identify that the mailing was not coordinated with candidates on the ballot. Additional public harm in this
23 case resulted from the failure to disclose information related to independent expenditures on campaign
24 statements and reports, including the cost of the individual advertisements. In mitigation, the language of
25 the advertisement clearly identified the California Republican Party as being responsible for the content
26 and therefore avoided the harm that would result from an anonymous advertisement. Further, the
27 information was disclosed, albeit on a form required for payments made to disclose communications that
28

1 clearly identified candidates but did not include express advocacy. The disclosures were made timely or
2 within 24 hours of the deadline to report the independent expenditures.

3 The California Republican Party is a political party committee and has prior experience and knew
4 or should have known the rules and regulations of the Act.

5 The Commission considers comparable cases to assist in determining the appropriate penalty.

6 The Commission considered and approved a stipulation in [the Matter of ACLU of Northern](#)
7 [California, FPPC No. 18/01511](#) at the August 2023 Commission Meeting. In that case, the ACLU agreed
8 to pay a \$6,500 penalty and admit to two counts (\$3,500 for reporting violations and \$3,000 for the
9 failure to include appropriate advertisement disclosure language). The violations in that matter were
10 similar to the facts here. The ACLU issued one communication, a mailing, that expressly advocated
11 against a candidate. The advertisement cost \$92,950 to distribute. Though the advertisement was clearly
12 from the ACLU, the advertisement failed to include the independent expenditure disclaimer language and
13 the advertisement disclosure was not formatted consistent with the requirements of the Act. ACLU failed
14 to report the advertisement on a campaign statement and failed to timely file a 24-hour independent
15 expenditure report.

16 Here, a higher penalty is recommended, there was a series of violations, not an isolated, single
17 communication incident, as was the case in *ACLU*. In *ACLU*, the reporting violations were charged as a
18 single count. Here, Enforcement recommends that each report and the failure to disclose information on a
19 campaign statement be charged separately. A higher per count penalty is recommended for the
20 advertisement counts. Respondents asserted that the advertisements in question were thought to be
21 “Issue” ads at the time and contend that the Safe Harbor provision applied. In mitigation, California
22 Republican Party filed the disclosures required for “Issue” ads, providing disclosure as to the amount of
23 funds spent on communications that related to clearly identified candidates. On regularly filed campaign
24 statements, Respondents reported the activity as expenditures but failed to disclose the additional,
25 required information for independent expenditures. Respondents included the “Paid for by” disclosure
26 language on the advertisements but failed to include the required independent expenditure language to
27 denote that the communications were not coordinated with candidates on the ballot. In aggravation,
28 Respondents failed to timely file five 24-hour contribution reports to disclose \$338,595 in nonmonetary

1 contributions in support of candidates.¹⁷ The 24-hour reports were filed late, but well before the election
2 and were timely reported on the second pre-election campaign statement. The error was corrected prior to
3 Enforcement contact. Therefore, this activity is not being separately charged but is considered as
4 aggravation with respect to violations assessed here.

5 Here, the Enforcement Division recommends a penalty of \$4,500 for counts 1, 7, 8, and 9; a
6 penalty of \$2,500 for counts 2-5 as there was some mitigation from the filing of disclosure statements for
7 “Issue” ads; and \$5,000 for counts 6 and 10, as the failure to identify these advertisements as an
8 independent expenditure was more egregious. In counts 6 and 10, the language in the advertisement was
9 more clearly express advocacy. In the case of Mueller, count 8, the advertisement stated, “This election,
10 un-friend Kipp Mueller”. This language is similar to, “No on Kipp Mueller” or “This election, vote no
11 for Kipp Mueller”. In the case of the Rodriguez advertisement, count 10 the advertisement clearly stated
12 “No on Andrew Rodriguez.”

Count	Description of the Violation	Penalty
1	Failure to Timely Disclose Reportable Activity on a Campaign Statement	\$4,500
2	Failure to Timely File a 24-hour Independent Expenditure Report	\$2,500
3	Failure to Timely File a 24-hour Independent Expenditure Report	\$2,500
4	Failure to Timely File a 24-hour Independent Expenditure Report	\$2,500
5	Failure to Timely File a 24-hour Independent Expenditure Report	\$2,500
6	Failure to Include Proper Disclosure on an Advertisement	\$5,000
7	Failure to Include Proper Disclosure on an Advertisement	\$4,500
8	Failure to Include Proper Disclosure on an Advertisement	\$4,500
9	Failure to Include Proper Disclosure on an Advertisement	\$4,500
10	Failure to Include Proper Disclosure on an Advertisement	\$5,000

25 After considering the factors listed in Regulation 18361.5 and penalties in prior similar cases, the
26 Enforcement Division recommends a total penalty of \$38,000.

28 ¹⁷ The total expenditures for the reporting period totaled \$3,341,553, therefore the late-filed reports constitute approximately 10% of the activity.

1 **CONCLUSION**

2 Complainant, the Enforcement Division of the Fair Political Practices Commission, and the
3 California Republican Party, Gandrud, and Nelson hereby agree as follows:

4 1. Respondents have violated the Act as described in the foregoing pages, which are a true
5 and accurate summary of the facts in this matter.

6 2. This stipulation will be submitted for consideration by the Fair Political Practices
7 Commission at its next regularly scheduled meeting—or as soon thereafter as the matter may be heard.

8 3. This stipulation resolves all factual and legal issues raised in this matter—for the purpose
9 of reaching a final disposition without the necessity of holding an administrative hearing to determine the
10 liability of Respondents pursuant to Section 83116.

11 4. Respondents understand, and hereby knowingly and voluntarily waive, any and all
12 procedural rights set forth in Sections 83115.5, 11503, 11523, and Regulations 18361.1 through 18361.9.
13 This includes, but is not limited to the right to appear personally at any administrative hearing held in this
14 matter, to be represented by an attorney at Respondents’ own expense, to confront and cross-examine all
15 witnesses testifying at the hearing, to subpoena witnesses to testify at the hearing, to have an impartial
16 administrative law judge preside over the hearing as a hearing officer, and to have the matter judicially
17 reviewed.

18 5. Respondents agree to the issuance of the decision and order set forth below. Also,
19 Respondent agrees to the Commission imposing against them an administrative penalty in the amount of
20 \$38,000. One or more payments totaling said amount—to be paid to the General Fund of the State of
21 California—is/are submitted with this stipulation as full payment of the administrative penalty described
22 above, and same shall be held by the State of California until the Commission issues its decision and
23 order regarding this matter.

24 6. If the Commission declines to approve this stipulation—then this stipulation shall become
25 null and void, and within fifteen business days after the Commission meeting at which the stipulation is
26 rejected, all payments tendered by Respondent in connection with this stipulation shall be reimbursed to
27 Respondents. If this stipulation is not approved by the Commission, and if a full evidentiary hearing
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1 before the Commission becomes necessary, neither any member of the Commission, nor the Executive
2 Director, shall be disqualified because of prior consideration of this Stipulation.

3 7. The parties to this agreement may execute their respective signature pages separately. A
4 copy of any party's executed signature page, including a hardcopy of a signature page transmitted via fax
5 or as a PDF email attachment, is as effective and binding as the original.

6
7 Dated: _____
8 Kendall L.D. Bonebrake
9 Chief of Enforcement
10 Fair Political Practices Commission

11 Dated: _____
12 Greg Gandrud, individually and on behalf of the California
13 Republican Party

14 Dated: _____
15 Sarah Nelson, individually and on behalf of the California
16 Republican Party

17 The foregoing stipulation of the parties, "In the Matter of California Republican Party, Greg
18 Gandrud, and Sarah Nelson," FPPC Case No. 2020-01009, is hereby accepted as the final decision and
19 order of the Fair Political Practices Commission, effective upon execution below by the Chair.

20
21 IT IS SO ORDERED.

22
23 Dated: _____
24 Adam E. Silver, Chair
25 Fair Political Practices Commission