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12 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**
13 **STATE OF CALIFORNIA**

14 In the Matter of:

15 COMMITTEE TO RE-ELECT
16 MICHAEL MINNIX EL CENTRO
17 SCHOOL BOARD AND MICHAEL
18 MINNIX

19 Respondents.

20 FPPC Case Nos. 2020-000817 & 2020-00998
21 STIPULATION, DECISION, AND ORDER

22 **INTRODUCTION**

23 Respondent Michael Minnix (“Minnix”) is a successful incumbent candidate for El Centro
24 Elementary School Board in the November 3, 2020, General Election and is currently in office.
25 Committee to Re-Elect Michael Minnix El Centro School Board (“the Committee”) is Minnix’s
26 candidate controlled committee. Minnix served as treasurer to the Committee.

27 Respondents violated the Political Reform Act¹ (“Act”) by failing to timely file certain campaign
28 statements and reports and failing to include the proper advertisement disclosures on certain
advertisements produced by the Committee.

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

1 **SUMMARY OF THE LAW**

2 The violations in this case occurred from 2020 through 2024 and all legal references and
3 discussions of law pertain to the Act’s provisions as they existed at that time.

4 **Need for Liberal Construction and Vigorous Enforcement of the Act**

5 When enacting the Act, the people of California found and declared that previous laws regulating
6 political practices suffered from inadequate enforcement by state and local authorities.² Thus, it was
7 decreed that the Act “should be liberally construed to accomplish its purposes.”³ One purpose of the Act
8 is to promote transparency by ensuring that receipts and expenditures in election campaigns are fully
9 and truthfully disclosed so that voters are fully informed and improper practices are inhibited.⁴ The Act,
10 therefore, establishes a campaign reporting system designed to accomplish this purpose of disclosure.
11 Another purpose of the Act is to provide adequate enforcement mechanisms so that the Act will be
12 “vigorously enforced.”⁵

13 **Duty to File a Statement of Organization**

14 A recipient committee shall file a statement of organization within 10 days after the committee
15 has qualified as a committee and report the committee’s date of qualification. The Secretary of State
16 shall assign a number to each committee that files a statement of organization and shall notify the
17 committee of the number.⁶ If there is a change in any of the information contained in a statement of
18 organization, an amendment shall be filed within 10 days to reflect the change.⁷ The committee must file
19 the original of the amendment with the SOS and a copy with the local filing officer.⁸

20 The name of a committee controlled by one or more candidates for purposes of the election of
21 the controlling candidate or candidates must include, in addition to the last name of the controlling
22 candidate(s), the office sought and year of the election.⁹

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24 _____
25 contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations. All regulatory references are to
26 this source.

27 ² Section 81001, subd. (h).

28 ³ Section 81003.

⁴ Section 81002, subd. (a).

⁵ Section 81002, subd. (f).

⁶ Section 84101, sub. (a).

⁷ Section 84103, sub. (a).

⁸ Sections 84103, subd. (a); and 84215.

⁹ Regulation 18402, subd. (c)(2).

1 **Duty to File Campaign Statements**

2 At the core of the Act’s campaign reporting system is the requirement that candidates and
3 committees must file campaign statements and reports for certain periods and by certain deadlines. The
4 Act requires candidates and their controlled committees to file campaign statements at specific times
5 disclosing information regarding contributions received and expenditures made by the campaign
6 committees.¹⁰

7 **Filing Due Dates**

8 Whenever the Act requires that a statement or report be filed prior to or not later than a specified
9 date, and the deadline falls on a Saturday, Sunday, or official state holiday, the filing deadline for such a
10 statement or report shall be extended to the next regular business day.¹¹ This extension does not apply to
11 24-hour contribution reports when the due date falls on a Saturday, Sunday, or official state holiday
12 immediately prior to an election.¹²

13 **Pre-Election Campaign Statements**

14 All candidates appearing on the ballot to be voted on at the next election, their controlled
15 committees, and committees primarily formed to support or oppose an elected officer, candidate, or a
16 measure appearing on the ballot to be voted on at the next election shall file the applicable preelection
17 statements specified in Section 84200.8.¹³

18 Applicable pre-election campaign statements shall be filed as follows: (1) for the period ending
19 45 days before the election, the statement shall be filed no later than 40 days before the election, and
20 (2) for the period ending 17 days before the election the statement shall be filed no later than 12 days
21 before the election.¹⁴

22 **24-Hour Contribution Reports**

23 A “late contribution” includes a contribution, including a loan, that totals in the aggregate \$1,000
24 or more and is made to or received by a candidate or a controlled committee during the 90-day period
25 preceding the date of the election, or on the date of the election, at which the candidate is to be voted
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27 ¹⁰ Section 84200, *et seq.*

¹¹ Section 81005, subd. (a) [effective 2019]; Regulation 18116, subd. (a) [2018].

¹² Section 81005, subd. (b)(1) [effective 2019]; Regulation 18116, subd. (b)(1) [2018].

¹³ Section 84200.5, subd. (a).

¹⁴ Section 84200.8, subds. (a)-(b).

1 on.¹⁵ Each committee that receives a late contribution shall report the late contribution within 24 hours
2 of the time it is received.¹⁶

3 The 90-day period preceding the November 3, 2020, General Election began on August 5, 2020.

4 **Semi-Annual Campaign Statements**

5 Recipient committees shall file semi-annual campaign statements each year no later than July 31
6 for the period ending June 30, and no later than January 31 for the period ending December 31 if they
7 have made contributions or independent expenditures, including payments to a slate mailer organization,
8 during the six-month period before the closing date of the statements.¹⁷

9 **Contents of Campaign Statements**

10 Each campaign statement shall contain all of the following information: (1) the total amount of
11 contributions received during the period covered by the campaign statement; and (2) the total amount of
12 expenditures made during the period covered by the campaign statement.¹⁸

13 **Period Covered by Campaign Statement**

14 “Period covered” by a campaign statement means the period beginning the day after the closing
15 date of the most recent campaign statement which was required to be filed and ending with the closing
16 date of the statement in questions.¹⁹ If a person has not previously filed a campaign statement, the period
17 covered begins on January 1.²⁰

18 **Mass Mailings**

19 The Act requires that a mass mailing disclose the name, street address, and city of the controlled
20 committee that sent the mailing, as well as the name of the person controlling the committee.²¹ Further,
21 the words “Paid for by” must precede the identifying information on the mass mailing.²² A mass mailing
22 has been made when more than 200 substantially similar pieces of mail are sent in a calendar month.²³
23 The disclosure area shall have a solid white background and shall be in a printed or drawn box on the

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25 ¹⁵ Section 82036, subd. (a).

26 ¹⁶ Section 84203, subd. (a).

27 ¹⁷ Section 84200, subd. (a).

28 ¹⁸ Section 84211

¹⁹ Section 82046, subd. (b).

²⁰ Section 82046, subd. (b).

²¹ Section 84305, subd. (a)(1)

²² Section 84502, subd. (a)(2).

²³ Section 842041.5.

1 bottom of at least one page that is set apart from any other printed matter.²⁴ All text in the disclosure
2 area shall be in contrasting color and centered horizontally in the disclosure area.²⁵ The text shall be in
3 an Arial equivalent type with a type size of at least 10-point.²⁶

4 **Joint and Several Liability of Candidate and Committee**

5 It is the duty of the candidate to ensure that the committee complies with all of the requirements
6 of the Act concerning the receipt, expenditure, and reporting of funds.²⁷ The candidate may be held
7 jointly and severally liable, along with the committee, for violations committed by the committee.²⁸

8 **Liability for Violations**

9 Any person who violates any provision of the Act, who purposely or negligently causes any
10 other person to violate any provision of the Act, or who aids and abets any other person in the violation
11 of any provision of the Act, is liable for administrative penalties up to \$5,000 per violation.²⁹

12 **SUMMARY OF THE FACTS**

13 *Background*

14 On October 20, 2020 and October 27, 2020, Michael Minnix filed three initial Statements of
15 Organization for Committee to Re-Elect Michael Minnix with the Imperial County Registrar of Voters
16 (“Imperial County ROV”). Each of the statements included incorrect qualification dates for the
17 November 3, 2020, General Election.

18 The Committee qualified as a committee under the Act on August 1, 2020 when it received over
19 \$2,000 in contributions, including a \$3,000 contribution from Minnix. The Committee was required to
20 file a Statement of Organization with the SOS within 10 days of qualifying as a committee. The
21 Committee and Minnix sent an initial Statement of Organization to the SOS, but it was returned for
22 correction on October 27, 2020, and again on November 3, 2020. As the statement was never filed, the
23 Committee was not properly registered or assigned an identification number with the SOS.

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26 ²⁴ Section 84504.2, subd. (a)(1)

27 ²⁵ Section 84504.2, subd. (a)(1).

28 ²⁶ Section 84504.2, subd. (a)(2).

²⁷ Sections 81004, 84100, 84104, and 84213; Regulation 18427.

²⁸ Sections 83116.5 and 91006.

²⁹ Sections 83116 and 83116.5

1 Since Minnix was listed as a candidate on the November 3, 2020, election ballot, the Committee
 2 and Minnix were required to file the first preelection campaign statement with the Imperial County
 3 ROV by the September 24, 2020 deadline, but failed to do so. The Committee and Minnix filed the first
 4 preelection statement on October 20, 2020. The Committee and Minnix timely filed the second
 5 preelection campaign statement with the Imperial County ROV by the October 22, 2020, due date.

6 The 90-day period preceding the November 3, 2020, General Election began on August 5, 2020.
 7 Within this period, the Committee and Minnix received several contributions that required 24-Hour
 8 Contribution Reports. Below is a chart summarizing those reports:

REPORT	REPORTING PERIOD	DUE DATE	DATE FILED	AMOUNT
24-Hour Contribution Report	8/30/2020	8/31/2020	Not Filed	\$1,000
24-Hour Contribution Report	9/1/2020	9/2/2020	Not Filed	\$1,000
24-Hour Contribution Report	9/1/2020	9/2/2020	Not Filed	\$2,011
24-Hour Contribution Report	9/1/2020	9/2/2020	Not Filed	\$2,050
24-Hour Contribution Report	9/12/2020	9/13/2020	Not Filed	\$1,000
24-Hour Contribution Report	10/1/2020	10/2/2020	Not Filed	\$6,120

15 The Committee and Minnix were required to file subsequent semi-annual campaign statements
 16 until the Committee terminated on June 30, 2024.³⁰ Below is a chart summarizing the late-filed
 17 campaign statements:
 18

STATEMENT	REPORTING PERIOD	DUE DATE	DATE FILED	ACTIVITY
Pre-Election	7/1/2020-9/19/2020	9/24/2020	10/20/2020	(C) \$12,380; (E) \$14,291
Semi-Annual	10/18/2020 – 12/31/2020	2/1/2021	7/18/2024	(C) \$99
Semi-Annual	1/1/2021 – 6/30/2021	8/2/2021	7/18/2024	\$0
Semi-Annual	7/1/2021 – 12/31/2021	1/31/2022	7/18/2024	\$0
Semi-Annual	1/1/2022 – 6/30/2022	8/1/2022	7/18/2024	\$0
Semi-Annual	7/1/2022 – 12/31/2022	1/31/2023	7/18/2024	\$0
Semi-Annual	1/1/2023 – 6/30/2023	7/31/2023	7/18/2024	\$0
Semi-Annual	7/1/2023 – 12/31/2023	1/31/2024	7/18/2024	\$0

28 ³⁰ While the Committee did not officially register with the SOS, they did file a termination Statement of
 Organization with the Imperial County ROV.

1 The Committee and Minnix were required to include proper disclosure on mass mailings. The
2 Committee and Minnix as well as two other candidates each paid \$1,005.67 to Imperial Printers for
3 11,000 copies of a mass mailing that read: “Join El Centro Elementary School Teachers November 3rd
4 and Vote for our 3 School Board Incumbents Patricia Dunnam, Chuck Fisher, and Michael Minnix.
5 Educators in El Centro Elementary want to keep leaders who unite us around a shared vision of high-
6 quality neighborhood school for every student in El Centro Elementary”. The mass mailing was
7 missing the text “Paid for by” and failed to include the three candidates or candidate’s committees full
8 name and address. The mailer contained no indication of who was responsible. Of the 11,000 copies,
9 9,560 were mailed through the post office via Every Door Direct Mail (“EDDM”) service.³¹

10 The Committee and Minnix sent another mass mailing without the proper sender identification
11 on or around September 24, 2020 and September 25, 2020. It read: “Re-Elect Michael Minnix El
12 Centro Elementary School Board” and included a biography about Minnix. The mass mailing was
13 missing the text “Paid for by” and the Committee’s full name and address. The mailer contained no
14 indication of who was responsible. 5,000 mass mailings were sent via EDDM service through the post
15 office.

16 PROCEDURAL HISTORY

17 On December 28, 2024, the Probable Cause Report was served on the Committee and Minnix.
18 On March 18, 2025, the Accusation was served on the Committee and Minnix. A notice of defense was
19 not filed; therefore, the matter was prepared for a Default Decision. On May 29, 2025, the Committee
20 and Minnix received a letter from the Enforcement Division indicating that the matter would appear on
21 the June 19, 2025, Commission Meeting Agenda as a notice item. On June 19, 2025, the case appeared
22 on the Commission Meeting Agenda as a pre-notice default.

23 VIOLATIONS

24 The Committee and Minnix

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28 ³¹ The Commission initiated individual investigations into the other two candidates, Dunnam and Fisher, regarding the mailer. Their cases were adjudicated and are now closed.

1 **Count 1: Failure to Timely File a Statement of Organization**

2 The Committee and Minnix failed to timely file a Statement of Organization within 10 days of
3 qualifying as a committee by the August 11, 2022 due date, in violation of Government Code Section
4 84101, subdivision (a).

5 **Count 2: Failure to Timely File 24 Hour Contribution Reports**

6 The Committee and Minnix failed to timely file four 24-Hour Reports disclosing six
7 contributions totaling \$13,181, in violation of Government Code Section 84203.

8 **Count 3: Failure to Include Proper Disclosures on Mass Mailings**

9 The Committee and Minnix failed to include proper advertisement disclosures on two mass
10 mailings, in violation of Government Code Sections 84305.

11 **Count 4: Failure to Timely File Campaign Statements**

12 The Committee and Minnix failed to timely file a pre-election campaign statement for the
13 reporting period of July 1, 2020 through September 19, 2020 by the deadline of October 17, 2020 in
14 violation of Government Code section 84200.5.

15 The Committee and Minnix failed to timely file a semi-annual campaign statement for the reporting
16 period of October 18, 2020 through December 31, 2020 by the deadline of February 1, 2021, in violation
17 of Government Code Section 84200.

18 **Count 5: Failure to Timely File Six Semi-annual Campaign Statements**

19 The Committee and Minnix failed to timely file six semi-annual campaign statements for the
20 reporting periods ending on June 30, 2021; December 31, 2021; June 30, 2022; December 31, 2022;
21 June 30, 2023; and December 31, 2023, in violation of Government Code Section 84200.

22 **PENALTY**

23 This matter consists of five counts of violating the Act, which carries a maximum administrative
24 penalty of \$5,000 per count, totaling \$25,000.

25 While all of these violations are eligible for the Streamline Program, due to the procedural
26 factors noted above, the Enforcement Division determined the most appropriate resolution is a mainline
27 stipulation. At the outset of the investigation, the Enforcement Division staff was successful in reaching
28

1 Minnix. However, Minnix failed to make requested amendments and did not file outstanding statements
2 until 2024 or re-engage in communication until 2025.

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 Divisions
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 the gravity of the public harm
8 caused by the specific violations; (2) The level of experience of the violator with the requirements of the
9 Political reform Act; (3) Penalties previously imposed by the Commission in comparable cases; (4) The
10 presence or absence of any intention to conceal, deceive, or mislead; (5) Whether the violation was
11 deliberate, negligent, or inadvertent; (6) Whether the violator demonstrated good faith by consulting the
12 Commission, staff or any other governmental agency in a manner not constituting complete defense
13 under Government Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern or
14 whether the violator has a prior record of violations of the Political Reform Act or similar law; (8)
15 Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide
16 full disclosure.³²

17 The failure to timely file campaign statements, particularly pre-election campaign statements and
18 24-Hour Reports, deprives the public of important time-sensitive information prior to the election. Here,
19 Minnix is currently in office and was in office at the time of many of the late-filed campaign statements.
20 Furthermore, Minnix has experience with the Act's requirements as a previous candidate and board
21 member for El Centro School Board. Therefore, he knew or should have known the Act's requirement

22 In mitigation of all counts, Minnix does not have a prior history of violating the Act. Minnix did
23 state in a letter to the Enforcement Division that significant personal circumstances prevented his
24 involvement with the case. Additionally, the Enforcement Division found no evidence that Respondents
25 intended to conceal, deceive, or mislead the public. Furthermore, all contributions listed on late 24-Hour
26 Reports were listed on campaign statements that were filed prior to the election. Finally, Minnix did file
27 all outstanding semi-annual statements in 2024.

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³² Regulation 18361.5, subd. (e).

1 **Count 1:**

- 2 • *In The Matter of Save Our Forest and Ranchlands Opposed to Measure B Sponsored by*
3 *California Local Energy Advancing Renewables, Jana Clark Sanders and Duncan McFetridge;*
4 FPPC Case No. 16/19753. Respondents were a primarily formed ballot measure committee,
5 principal officer, and treasurer and failed to timely file a Statement of Organization within ten
6 days of qualifying as a committee, in addition to other violations. On November 17, 2016, the
7 Commission approved a \$1,500 penalty for this violation.

8 As to Count 1, Respondents are deserving of a penalty consistent with *Save Our Forest*. Neither
9 *Minnix* nor *Save Our Forest* had a prior enforcement history. However, *Save Our Forest* was a
10 substantially larger committee, raising approximately \$110,000 and spending \$45,000 during the
11 respective election, whereas *Minnix* raised \$12,479 and spent \$14,091 for the election. Unlike *Save Our*
12 *Forest*, however, *Minnix's* matter proceeded to a Pre-Notice Default, requiring additional Enforcement
13 resources. Accordingly, a similar penalty of \$1,500 is appropriate.

14 **Count 2:**

- 15 • *In the Matter of Steve Grasha for Mission Springs Water District 208, Steve Grasha for Desert*
16 *Water Agency 2022, and Steve Grasha;* FPPC Case No. 18/1268. Respondents, the 2018
17 Committee and Grasha, among other violations, failed to timely file five 24-Hour Contribution
18 Reports. The total amount of contributions not disclosed was \$12,359.16. On November 21, 2024,
19 the Commission imposed a penalty of \$3,000 for one count of failing to timely file five 24-Hour
20 Contribution Reports.

21 As to Count 2, Respondents are deserving of a slightly lesser penalty than in *Grasha*. *Grasha* and
22 the 2018 Committee failed to timely file five reports in the amount of \$12,359.16 for their Count 1;
23 comparable to *Minnix's* case where there were six reports in the amount of \$13,181. Both *Grasha* and
24 *Minnix* were successful in their elections. Furthermore, both *Grasha* and *Minnix's* cases went to Pre-
25 Notice Default before settlement. However, unlike *Grasha*, *Minnix's* contributions were timely filed on
26 pre-election campaign statements. Moreover, there was evidence to suggest the violations were part of a
27 pattern of repeated conduct in *Grasha*. Therefore, a penalty in the amount of \$2,500 is recommended.

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1 **Count 3:**

- 2 • *In the Matter of Megan Dahle for Assembly 2020, and Megan Dahle*; FPPC Case No. 20/323.
3 *Dahle* was a successful incumbent candidate for State Assembly in the March 3, 2020, Primary
4 Election. The Committee and *Dahle* failed to include the accurate name of the committee on a
5 mass mailing distributed to 59,000 individuals, On July 24, 2020, the Commission imposed a
6 penalty of \$2,500 for failing to comply with disclosures for mass mailings.

7 As to Count 3, a similar penalty to the *Dahle* case is warranted, given the procedural posture of
8 this case. In mitigation, both *Dahle* and *Minnix*'s Committees reported the expenditures associated with
9 the mailers on the respective campaign statements; therefore, there was some disclosure related to the
10 mailer. Additionally for *Minnix*, *Minnix*'s committee was a much smaller local committee, and the mailers
11 were sent to fewer recipients (10,000 for mailer one and 5,000 for mailer two).

12 While *Minnix* failed to include the words "Paid for by" and the committee's name, *Dahle*'s mailer
13 included the "Paid for by" disclosure, but the disclosure identified the responsible committee incorrectly,
14 thereby causing some confusion as to who funded the mailer. Based on the foregoing, a penalty in the
15 amount of \$2,500 is recommended on Count 3.

16 **Count 4:**

- 17 • *In the Matter of Esau Herrera For Assembly 2016, Esau Herrera, And Rebecca Rivera*; FPPC
18 Case No. 17/849. Herrera was an unsuccessful candidate for Assembly District 27 in the June 7,
19 2016, Primary Election. The Committee, Herrera, and Rivera failed to timely file a pre-election
20 campaign statement and two semi-annual campaign statements, in violation of Government Code
21 Sections 84200.5 and 84200 (1 count), in addition to other violations. The Commission approved
22 a stipulation in this matter on January 21, 2021. The Commission imposed a penalty of \$2,000 for
23 this violation.

24 A similar penalty is warranted here as both *Herrera* and *Minnix* filed the second pre-election
25 campaign statement timely. In aggravation, *Hansen* was an experienced filer and had paid a penalty for
26 the same violation in the past. In aggravation for *Minnix*, *Minnix*'s case went to Pre-Notice Default.
27 Therefore, a penalty of \$2,000 is recommended for Count 4.

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1 **Count 5:**

- 2 • *In the Matter of Patty Padilla-Salsberg for SUHSD Board of Trustees 2015, Patricia Padilla-*
3 *Salsberg, and Guadalupe Osorni*; FPPC Case No. 18/663. Respondents, the Committee, Padilla-
4 Salsberg, and Osornio failed to timely file seven semi-annual campaign statements. On November
5 19, 2020, the Commission approved a fine of \$2,000 each for two counts of failing to timely file
6 campaign statements

7 As to Count 5, Respondents are deserving of a similar penalty of \$2,000 for one count. Both
8 *Padilla* and *Minnix* were successful in their respective elections and were in office at the time of the non-
9 filings. However, two of *Padilla's* late statements reported activity, whereas each of *Minnix's* late
10 statements reflected \$0 in activity.

11 In aggravation for *Padilla*, additional violations of the Act occurred but were not charged in the
12 interest of settlement. Specifically, *Padilla's* Committee failed to timely file an amendment to its
13 Statement of Organization after qualification and failed to timely file four 24-Hour Contribution Reports
14 totaling \$8,500 in contributions. Here, *Minnix* is charged separately with failing to timely file a Statement
15 of Organization and failing to file 24-Hour Contribution Reports. Thus, a single count in the amount of
16 \$2,000 is recommended in the interest of settlement.

17 In aggravation to all counts, there were additional violations not charged here that were eligible
18 for a Streamline Tier One penalty and dropped for the purpose of settlement. These violations include
19 the failure to amend two pre-election statements for reporting periods ending on September 19, 2020 and
20 October 17, 2020. The amendments included updating the summary page to accurately reflect the totals
21 reported on Schedules A and B. Additionally, *Minnix* failed to include the employment/occupation
22 information on one contribution in the amount of \$1,000 received on September 1, 2020.

23 Based on the factors outlined above, the Enforcement Division is seeking a total penalty of
24 \$10,500 as follows:

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Count #	Violation	Penalty Amount
1	Failure to timely file a Statement of Organization	\$1,500
2	Failure to timely file four 24-Hour Contribution Reports	\$2,500

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3	Failure to include proper disclosures on mass mailings	\$2,500
4.	Failure to timely file campaign statements	\$2,000
5.	Failure to timely file six semi-annual statements	\$2,000
	Total:	\$10,500

CONCLUSION

Complainant, the Enforcement Division of the Fair Political Practices Commission, and Respondents, Committee to Re-Elect Michael Minnix El Centro School Board and Michael Minnix hereby agree as follows:

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

2. 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.

3. 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.

4. 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 the Respondents' own expense, to confront and cross-examine all witnesses testifying at the hearing, to subpoena witnesses to testify at the hearing, to have an impartial administrative law judge preside over the hearing as a hearing officer, and to have the matter judicially reviewed.

5. The Respondents agree to the issuance of the decision and order set forth below. Also, the Respondents agree to the Commission imposing against it an administrative penalty in the amount of \$10,500. One or more cashier's checks or money orders totaling said amount—to be paid to the General Fund of the State of California—is/are submitted with this stipulation as full payment of the

1 administrative penalty described above, and same shall be held by the State of California until the
2 Commission issues its decision and order regarding the matter.

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

9 7. The parties to this agreement may execute their respective signature pages separately. A
10 copy of any party’s executed signature page including a hard copy of a signature page transmitted via
11 fax or as a PDF email attachment is as effective and binding as the original.

12
13 Dated: _____
14 Kendall L.D. Bonebrake, Chief of Enforcement
15 Fair Political Practices Commission
16

17
18 Dated: _____
19 Michael Minnix, individually and on behalf of
20 Committee to Re-Elect Michael Minnix El Centro
21 School Board
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